

# **Report to confirm compliance with Bill S-211, Fighting Against Forced Labour and Child Labour in Supply Chains Act**

## **Genesis Hospitality Inc. and its subsidiaries**

**May 28, 2025**

### **Identifying information**

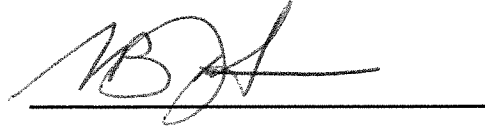
<b>Reporting entity's legal name</b>	<b>Genesis Hospitality Inc. et al</b>
<b>Financial reporting year ended</b>	<b>February 28, 2025</b>
<b>Business number</b>	<b>871186094</b>
<b>Identification of a joint report</b>	<b>Not applicable</b>
<b>Identification of reporting obligations in other jurisdictions</b>	<b>None</b>
<b>Entity categorization according to the Act</b>	<b>Corporation</b>
<b>Sector/industry</b>	<b>Hospitality</b>
<b>Location</b>	<b>Brandon, Manitoba, Canada</b>

## Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in this report. Based on our knowledge, and having exercised reasonable diligence, attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

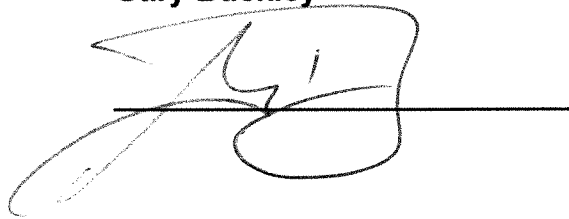
Title                      President  
Full name                Vionell Jacobson

Signature



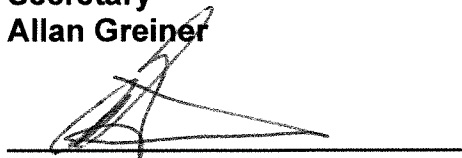
Title                      Vice-President  
Full name                Gary Buckley

Signature



Title                      Secretary  
Full name                Allan Greiner

Signature



Date                        May 28, 2025

We have the authority to bind Genesis Hospitality Inc. and its subsidiaries.

Note:

This report received approval from the Board of Directors of Genesis Hospitality on May 28, 2025.

**Note:**

This report references activities undertaken during Genesis Hospitality's previous financial year (March 1 – February 28, 2025).

- 1. The steps Genesis Hospitality group of companies has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by Genesis Hospitality group of companies or of goods imported into Canada by Genesis Hospitality group of companies.**
  - a. Genesis Hospitality group of companies, its officers and managers, and its Human Resources staff consistently apply care and due diligence in complying with all labour laws and employment standards of the Provinces in which it operates, including the *Employment Standards Code* which specifies minimum wage standards, protection for young workers, and the payment of wages.**
  - b. Genesis Hospitality group of companies also complies with the *Worker Recruitment and Protection Act* of Manitoba and other similar legislations in its other Provinces of operation.**
  
- 2. Genesis Hospitality group of companies structure, activities and supply chains**
  - a. Genesis Hospitality is a group of corporations registered in the Province of Manitoba.**
  - b. Genesis Hospitality group of companies are privately-owned, for-profit companies.**
  - c. The organizational structure consists of Hotel GMs reporting to a Regional Director who reports to the Executive Vice President. There is a standard chain-of-command structure.**
  - e. The number of employees is 1,000+.**
  - f. Genesis Hospitality group of companies provide hospitality through Hotels, Restaurants, Bars, Beer Vendors in Alberta, Saskatchewan, Manitoba, and Ontario.**
  - h. Genesis Hospitality group of companies purchase materials from domestic and international companies.**
  - i. Food is the largest volume supply used in Genesis Hospitality group of companies operations. We purchase food produced by North American growers and processors operating in North America.**
  - j. Genesis Hospitality group of companies supply chains include suppliers and manufacturers that are located in several countries. A very large majority of our suppliers are located in Canada and the USA. We have 2 or fewer suppliers located in European countries. Supplies from India, China, Bangladesh, Pakistan are all purchased through either Canadian or USA suppliers and redistributors.**
  
- 3. Genesis Hospitality group of companies policies and due diligence processes in relation to forced labour and child labour**

Genesis Hospitality group of companies has created a Supplier Code of Conduct that will be made available to all suppliers, agents, consultants, and other third parties and

business partners, and their respective employees, directors, and officers through our website [www.genesishospitality.ca](http://www.genesishospitality.ca).

Genesis Hospitality group of companies will also continually:

- Identify and assesses adverse impacts in operations, supply chains and business relationships
- Cease, prevent (where possible) or mitigate adverse impacts
- Track implementation and results
- Communicate how impacts are addressed
- Provide for and cooperate in remediation when appropriate

4. **The parts of Genesis Hospitality group of companies business and supply chains that carry a risk of forced labour or child labour being used and the steps Genesis Hospitality group of companies has taken to assess and manage that risk**

*Risk: Materials and supplies that Genesis Hospitality group of companies procure for use in its operations coming from high-risk zones.*

*Response: Genesis Hospitality group of companies strives to deal exclusively with Canadian suppliers or trading houses. Genesis Hospitality group of companies communicates with suppliers and inquires about their products, practices and compliance forced labour and child labour laws.*

5. **Any measures taken to remediate any forced labour or child labour**

*No measures have been taken to remediate forced labour or child labour in activities and supply chains*

6. **Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains**

*No measures have been taken in this area*

7. **The training Genesis Hospitality group of companies have provided to employees on forced labour and child labour**

*Genesis Hospitality group of companies trains all employees in human trafficking awareness.*

8. **How Genesis Hospitality group of companies assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains**

*No actions have been taken to assess effectiveness in preventing and reducing risks of forced labour and child labour in activities and supply chains.*