

REPORT ON ACTIONS TAKEN TO PREVENT AND REDUCE THE RISKS OF FORCED LABOUR AND
CHILD LABOUR IN OPERATIONS AND SUPPLY CHAINS
OF THE FOUR SEASONS HOTEL TORONTO
FOR THE FISCAL YEAR ENDING 31 DECEMBER 2024

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ARTICLE I ABOUT THIS REPORT

This statement (“Report”) is made on behalf of Paramita Enterprises Limited o/a Four Seasons Hotel Toronto pursuant to the reporting obligation under Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). This Report covers the period of January 1, 2024, to December 31, 2024 (the “Reporting Period”). In this Report, the terms “we”, “our” and “the Hotel” refer to Paramita Enterprises Limited o/a Four Seasons Hotel Toronto.

ARTICLE II OUR STRUCTURE & BUSINESS ACTIVITIES

Section 1. Ownership and Management. The Hotel is owned by Paramita Enterprises Limited and operated under a hotel management agreement provided by the iconic Toronto-headquartered Four Seasons Hotels Limited, trading as Four Seasons Hotels and Resorts, a Canadian luxury hotel company (the “Hotel Manager”). The Hotel Manager is headquartered and located in Toronto, Ontario.

Section 2. The Hotel. Four Seasons Hotel Toronto (the “Hotel”) is a 5-star luxury hotel with 259 recently redesigned guest rooms and suites. The Hotel is located in Toronto’s historic Yorkville area where the facility’s design and customer experience recruits Yorkville’s unique juxtaposition of urban sophistication and natural beauty. The Hotel delivers visitors and guests a warm Canadian welcome framed by a luxurious, spacious, and modern design. Patrons experience the Hotel’s authentic modern French cuisine at Café Boulud and specialty craft cocktails at local favourite d|bar, a spirited lobby lounge and bar. Guests and visitors enjoy world-class service experiences which range from relaxing in the serenity of the Spa’s extensive relaxation and wellness offerings, to stepping outside and exploring the vibrant character of Yorkville’s glamorous shopping and restaurant district.

Section 3. Four Seasons for Good. The Hotel is committed to building upon a strong history of supporting communities and the environment. We participate in and expressly adopt the Hotel Manager’s environmental social and governance program *Four Seasons for Good (2025 Modern Slavery Act Statement)* (<https://www.fourseasons.com/esg/>), which reiterates our commitment to preserving and regenerating the beautiful place in which we operate, and our promise to leave a positive and enduring impact on our communities.

ARTICLE III OUR SUPPLY CHAINS

Our supply chains consist of a combination of centralized and decentralized sourcing. Goods and services are sourced¹ and procured² centrally through the Hotel Manager and locally (decentralized) by the Hotel.

¹ Identifying the required products and services.

² Securing the agreements for the purchase of products and services.

Section 1. Centralized Sourcing. The Hotel Manager manages certain sourcing and some procurement functions centrally (e.g., tendering and contract negotiations) of many of the Four Seasons™ branded items in guest rooms (e.g., bedding, terry, textiles, room supplies, etc.) and tabletop categories (e.g., chinaware, glassware, flatware, holloware, table linens, etc.) through its Sourcing and Procurement team. The Hotel Manager's centrally sourced and procured items are produced by third-person manufacturers, including suppliers that we import from numerous countries. Canada, China, Columbia, Egypt, France, Germany, India, Indonesia, Italy, Egypt, France and Portugal are the countries of origin for most of these products. Other notable source countries include: Australia, Japan, Malaysia, Mexico, Morocco, Myanmar, South Africa, South Korea, Thailand, Turkey, the United Arab Emirates, the United Kingdom, and the United States of America.

Section 2. Decentralized (Local) Sourcing. Most goods and services required for the Hotel are sourced and procured directly by our purchasing teams. These items include non-Four Seasons™-branded hotel amenities, food and beverages, office and general supplies, IT and mechanical equipment, furniture, and labour services.

Section 3. Responsible Sourcing. For both centralized and decentralized sourcing and procurement, the Hotel Manager and the Hotel (respectively) support only responsible and sustainable suppliers and impose requirements to comply with applicable laws, including laws intended to prevent and eliminate forced labour, human trafficking and child labour.

We require that third-person entities, their principals and individuals who engage in trade with both the Hotel and the Hotel Manager, will comply with the Hotel Manager's and our internal policies with respect to ethics and human rights.

ARTICLE IV RELEVANT POLICIES & DILIGENCE

We commit to responsible workplace practices at the Hotel and throughout our supply chain. Respecting and protecting human rights is fundamental to our approaches. The Hotel commits to conducting its businesses in compliance with applicable laws and the highest ethical standards.

We further commit to reflecting deeply about human rights-related risks from and to our operations, and to implementing rational measures to ensure that persons who provide services to us and on our behalf – including our associates, and external contractors and agents – are aware of, share our and implement our commitment to an ethical culture.

Section 1. The Hotel Manager's Policies. The Hotel expressly reaffirms its adoption of certain relevant policies promulgated by the Hotel Manager in *Four Seasons for Good (2025 Modern Slavery Act Statement)* (<https://www.fourseasons.com/esg/>).

(a) Human Rights Policies & Principles Against Modern Slavery. Our Human Rights Policy outlines our approach in support of universal human rights specifically protecting against Modern Slavery (defined below), informed by the relevant principles contained in

- ✓ *The United Nations ("UN") Universal Declaration of Human Rights* (<https://www.un.org/en/about-us/universal-declaration-of-human-rights>),

- ✓ *The International Labour Organisation (“ILO”) Standards* (<https://www.ilo.org/international-labour-standards>),
- ✓ *The UN Guiding Principles on Business and Human Rights* (<https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights>),
- ✓ *UN Global Compact* (<https://unglobalcompact.org/>), and
- ✓ *The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (the “Code”)* (<https://thecode.org/>).

Our Human Rights Policy enunciates our commitment to prevent and eliminate Modern Slavery, including forced labour, human trafficking, and child labour and the rights of children as follows:

(a) **Eliminating and Preventing Forced Labour.** We commit to ensuring that forced labour in all its forms is prevented from occurring in, arising out of, or related to our business activities. In this report, “Modern Slavery” includes modern slavery, practices which are comparable in effect to slavery, bonded labour, bonded debt, trafficking in persons, prison labour, compulsory labour, military work, unlawful recruitment of children, and domestic servitude. We also commit to ensuring protection for those categories of workers who are notoriously vulnerable to exploitation.

We expressly adopt and abide by the Sustainable Hospitality Alliance’s *Principles on Forced Labour* ([Principles on Forced Labour for the hospitality industry](#)), namely, that:

- Every worker should have freedom of movement;
- No worker should pay for a job; and
- No worker should be indebted in connection with obtaining work or coerced by debt or servitude to work.

(b) **Preventing/Eliminating Human Trafficking.** We commit to ensuring that human trafficking in all its forms is prevented from occurring across our operations, in line with the *UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime* ([Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime | OHCHR](#)).

(c) **Preventing/Eliminating Child Labour; Promoting the Rights of Children.** We commit to ensuring that exploitation of children in all forms does not take place in our business operations. The Hotel Manager is a signatory to *The Code* (described in Article IV Section 1(a) above) and commits to complying with all applicable laws for the protection of children’s rights, not recruiting child labour, and supporting the elimination of all forms of exploitative child labour, as defined by the ILO. This commitment includes, for greater certainty, ensuring that: (i) all work that may be performed by persons under the age of 18 is compliant with all applicable local laws and employment standards; (ii) work is not provided or offered under circumstances that are mentally, physically, socially, or morally dangerous to any underage worker, and (iii) work does not interfere with the underage worker’s schooling by depriving any individual of the opportunity to attend school, obliging such person to leave school prematurely, or requiring such person to attempt to

combine school attendance with excessively long and heavy work. The Hotel Manager also applies these commitments to its management of our Hotel.

ARTICLE V SUPPLIER CODE OF CONDUCT

We support and protect human rights. We have a zero-tolerance approach to human rights abuses. We expressly adopt and implement the Hotel Manager's *Supplier Code of Conduct*, including provisions which require suppliers of centrally sourced and procured goods to align their practices with those outlined in the Hotel Manager's *Human Rights Policy*. Suppliers are expected to:

- ✓ Support the elimination of forced labour and human trafficking by complying with the Sustainable Hospitality Alliance's *Principles of Forced Labour*.
- ✓ Ensure that no worker pays for a job. Fees and costs associated with recruitment and obtaining employment must not be paid by workers.
- ✓ Comply with all applicable laws regarding recruitment and hiring of workers, including workers provided by temporary help agencies.
- ✓ Prevent all situations in which any worker is indebted or coerced to work.
- ✓ Condemn all forms of exploitation of children and not use child labour directly or indirectly in their supply chain, in accordance with the relevant ILO standards.
- ✓ Provide appropriate training to Supplier employees to ensure compliance with the *Human Rights Policy*, the Sustainable Hospitality Alliance's *Principles of Forced Labour*, applicable ILO standards, and any other relevant laws and policies.
- ✓ Have a reasonable system in place to assess, on an ongoing basis, their own effectiveness in ensuring that forced labour and child labour are not being used in the Supplier's own business and supply chain.
- ✓ Collaborate with reasonable requests arising in the course of human rights-related audits, investigations, or information requests by the Hotel Manager or by any law enforcement authority with applicable jurisdiction.

ARTICLE VI CODE OF BUSINESS CONDUCT AND ETHICS

We implement a strong commitment to conduct our business in a lawful and ethical manner, as defined by adopting and implementing the Hotel Manager's *Code of Business Conduct and Ethics*. We have established procedures to permit individuals to submit, on a confidential and anonymous basis (to the fullest extent possible consistent with applicable law), good faith complaints relating to violations of the Hotel's Manager's *Commitment to An Ethical Culture* ([Commitment to an Ethical Culture | Four Seasons Hotel and Resorts](https://media.business-humanrights.org/media/documents/files/Hotel-Code-of-Conduct.pdf)) and its *Code of Business Conduct and Ethics* (<https://media.business-humanrights.org/media/documents/files/Hotel-Code-of-Conduct.pdf>).

The Hotel expressly prohibits any retaliation against individuals who make good faith reports of concern or misconduct.

ARTICLE VII DILIGENCE

Section 1. Centrally Sourced/Procured Goods Managed by the Hotel Manager. In 2024, the Hotel Manager implemented and in 2025 continued its Environmental, Social and Governance (ESG) due diligence processes, in which prospective Tier 1³ suppliers of centrally sourced and procured goods are required to acknowledge adherence to our Supplier Code of Conduct to be eligible to participate in Request for Proposals (RFPs). Eligible suppliers are also required to provide intake information that serves as a baseline for the due diligence process. This includes financial data and information on the locations of their factories and distribution centres, which informs the level of supplemental due diligence required.

Based on this information, the Hotel Manager conducts ESG risk mapping, identification (against discrete and identified indices: Modern Slavery; Child Labour; Migrant Workers; Minority Rights; Women's and Girl's Rights; and Security Forces and Human Rights) and assessment. Tier 1 suppliers of centrally sourced and procured goods are required to respond to a series of ESG questions covering human rights topics such as human trafficking, forced labour, and child labour, as well as other related topics such as labour performance, employee wellbeing, Codes of Conduct, and management of Tier 2⁴ and Tier 3⁵ suppliers. Responses are assessed using a comprehensive ESG decision matrix and assigned a High, Medium or Low-Risk rating. For suppliers whose responses qualify as High Risk, additional due diligence may be conducted, or we may debar the supplier from the present and any future competitive bidding.

All of the Hotel Manager's Master Purchasing Agreements for centrally sourced and procured goods issued after December 2023 include a right-to-audit clause, and the Hotel Manager has implemented (via an amendment) comparable clauses in the terms and conditions applicable to all existing agreements by the end of 2024.

Section 2. Non-Centrally Sourced and Procured Goods. In the course of sourcing local goods, onboarding new suppliers, procurement and outsourcing labour, representatives from the Hotel purchasing team in collaboration with responsible operations, managers at the Hotel Manager must gather information to perform and complete appropriate diligence activities, and complete a fulsome analysis which may include conducting site visits depending on the category and frequency of procurement of products or services.

ARTICLE VIII IDENTIFYING & MANAGING MODERN SLAVERY RISKS

Across all properties managed by the Hotel Manager (including the Hotel), the Hotel Manager has established and deployed processes and resources to identify and review risks, including those related to ESG and the risks of forced and child labour. The Hotel Manager has

³ Supplier with whom we directly conduct business, including contracted manufacturing facilities or production partners.

⁴ Sources and suppliers where Tier 1 suppliers procure materials.

⁵ Suppliers to Tier 2 suppliers that are one or more steps further removed from a final product, including those that customarily provide raw materials.

prioritized the integration of ESG-related risks more fully into its risk management tools and practices. The Hotel adopts and relies on each of these measures.

Section 1. Risks. We acknowledge that potential human rights risks related to our hotel operations and supply chains cannot be entirely excluded. They include, but are not limited to the following:

(a) Supply Chains. The hospitality industry in which we and the Hotel Manager operate is a significant purchaser of products such as food, linens, and amenities that involve a diverse supply chain, including multiple subcontractor tiers. It cannot be completely excluded that exploitative labour conditions, including forced labour and child labour, occur at one or more stages of such supply chains. The risks of such occurrences vary depending on factors such as product category and country of origin.

(b) Outsourced Labour Services at the Hotel. Third-person service providers may be contracted by the Hotel to complete specific tasks, including, but not limited to, landscaping, maintenance, and transportation. It cannot be excluded that certain systemic lack of job security and limited legal protections may make individuals who work for such contractors more vulnerable to employer exploitation.

(c) Temporary Labour Sourcing, including Foreign and Migrant Labourers. The Hotel may engage temporary labour assistance through employment agencies, especially in the case of filling specific labour gaps (e.g., seasonal positions, banqueting, housekeeping, and the construction of properties by owner-hired contractors, etc.). Individuals who serve in such roles may be at greater risk of exploitation due to their transient status and significant lower bargaining power. In certain markets, the hospitality industry may employ migrant workers, who are recruited through labour agencies, and who may be particularly vulnerable to exploitation due to language barriers, lack of legal documentation, and limited knowledge of their rights.

(d) Human Trafficking. Hotels (including our Hotel) cannot entirely exclude the possibility of being used as instruments of human trafficking. Traffickers may exploit systemic vulnerabilities, such as the anonymity provided by temporary accommodations, to coerce individuals into commercial sexual exploitation or forced labour.

The Hotel's and the Hotel Manager's policies, training, diligence, risk management practices and the cross-sector collaboration described in this Report, each of which are adopted and practiced by the Hotel, are designed to mitigate and to the degree possible, eliminate the above risks.

ARTICLE IX TRAINING

Capacity building, training and awareness are critical measures we take in our serious and relentless efforts to fight human rights abuses, including fighting against Modern Slavery, such as human trafficking, forced labour, and child labour.

Section 1. Human Trafficking Awareness. All Hotel employees must complete annual human trafficking awareness training, and education which identifies the clear signs of human and

labour trafficking, potential victims, and the requirement to respond quickly and safely to assist adversely affected individuals.

This training was developed with the support of an external organization, BEST Alliance ([Businesses Ending Slavery & Trafficking Training Center – Human trafficking prevention training for employees](#)), and is reviewed and updated annually. To pass the training, all employees are required to receive an 80% score on a quiz, after having completed the training.

The Hotel's Director of Security receives BEST's *Inhospitable Human Trafficking Training* as additional training.

Section 2. Implementing the Hotel Manager's Code of Business Conduct and Ethics. Each Hotel employee must review and acknowledge the applicable Code of Business Conduct and Ethics annually. Our Code of Business Conduct and Ethics and its associated training codify our commitment to positively supporting our communities, respecting human rights, and preserving the planet for future generations.

Section 3. Regular Evaluation. Our human rights related training efforts are evaluated regularly and where relevant, they are refined to adapt to emerging challenges and changing dynamics in the industry.

ARTICLE X REMEDATION & ASSESSING EFFECTIVENESS

The Hotel Manager has established (and the Hotel has adopted) procedures that enable our employees to submit, on a confidential and anonymous basis (to the fullest extent possible consistent with applicable law), good-faith concerns about illegal or unethical behaviour through a third-person, independent reporting service provider retained by the Hotel Manager.

Reports filed through this ethics hotline are initially reviewed by the Hotel manager's Executive Vice President and Chief People and Culture Officer, Senior Vice President, Internal Audit and Risk, and Senior Vice President, Corporate Counsel and Compliance.

Any instances of concern, whether reported through the ethics hotline, discovered during due diligence screening and assessments, or otherwise, are investigated. Corrective actions may be required in instances of lower severity. Agreements and relations with suppliers may be terminated depending on the context and severity of the issue(s) found.

In the course of 2024, neither did the Hotel Manager, nor the Hotel identify any forced labour or child labour occurrences in the Hotel's activities and supply chains. In consequence, we did not identify any loss of income to vulnerable families or individuals resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

ARTICLE XI ADVANCEMENTS IN 2024

Key initiatives and projects commenced in 2023 were continued in 2024 in collaboration between the Hotel and the Hotel Manager to strengthen our understanding of Modern Slavery including human rights, human trafficking, forced labour and child labour risks and to improve the

effectiveness of our approach to mitigate and eliminate those risks from our operations and our supply chains. We summarize these major initiatives below:

Section 1. Hotel Collaboration in Human Rights Risk Mitigation. We worked directly with the Hotel Manager to evaluate the effectiveness of our current mitigation measures, proactively seeking opportunities to further enhance and improve our systems and practices.

Section 2. Hotel Manager's Right-to-Audit Contracts. Starting in December, 2023, the Hotel Manager included a right-to-audit clause in every newly-issued Master Purchasing Agreement for centrally sourced and procured products and implemented an amendment for extant contracts to the same effect. We are already benefitting from those rights in our continuing assessment of potential supply chain risks, including those related to Modern Slavery.

ARTICLE XII APPROVAL & ATTESTATION

The 2024 report was approved with effect on 28 May 2025, pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of Paramita Enterprises Limited o/a Four Seasons Hotel Toronto.

In accordance with the requirements of the Act, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge and having exercised reasonable diligence, I further attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act and for the Reporting Period.

Shahid Rafiq Khan



Director, Chief Executive Officer, Chief Operating Officer &
President
28 May 2025