



Ripley's

Modern Slavery Report 2024

This Modern Slavery Report (the “Report”) addresses the period from January 1, 2024, to December 31, 2024, and has been prepared in compliance with Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (Canada) (the “Act”).

This initial Report is made on behalf of **Jim Pattison Entertainment Ltd. dba Ripley's (“Ripley's”), including its wholly owned subsidiaries Ripley's Aquarium of Canada Ltd., and Niagara Water Parks Properties Ltd.,** and is a joint report.

I. INTRODUCTION

Forced or child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading business in the entertainment industry, Ripley's recognizes the important role that we have in ensuring that the supply chains that support our operations and products adhere to the highest ethical standards, including the prevention and identification of forced or child labour in our supply chain.

II. CORPORATE OVERVIEW AND SUPPLY CHAINS

Ripley's Aquarium of Canada

Ripley's Aquarium of Canada Ltd. is the owner of Ripley's Aquarium of Canada located at 288 Bremner Blvd, Toronto, Ontario, Canada ("Ripley's Aquarium"). Ripley's Aquarium is a world-class attraction in the heart of downtown Toronto, adjacent to the CN Tower and the Rogers Centre. Ripley's Aquarium is operated by Ripley's Aquarium of Canada LTD, the general partner.

Ripley's Aquarium is a 135,000 square feet (12,500 square metre) attraction with more than 1.5 million gallons (5.7 million litres) of water depicting marine and freshwater habitats from around the world. Ripley's Aquarium operates a retail giftshop called the Cargo Hold Gift Shop that sells aquarium-related items such as plush toys, keychains, T-shirts, books, and toys.

Ripley's Aquarium is affiliated with Ripley Entertainment located in Orlando, Florida, United States. Ripley's Aquarium is operated by an executive team including the General Manager, Assistant General Manager, Director of Sales, Marketing & Events, Senior Manager of HR, Director of Husbandry and Director of Facilities and LSS. Overall, Ripley's Aquarium employees approximately 90 full-time employees and more than 200 part-time employees.

Ripley's Aquarium is both a local and regional tourist attraction selling admission tickets, in addition to an educational facility hosting more than 75,000 school aged visitors annually. Ripley's Aquarium also operates Ripley Café, Cargo Hold Gift Shop and Photo Port inside the aquarium.

Ripley's Aquarium's three largest departments in terms of procurement are Retail, Food & Beverage (F&B), and Facilities.

Retail is the largest department in terms of procurement value and number of suppliers. Ripley's Aquarium retail supply chain includes businesses that supply traditional retail products such as plush animals and branded clothing. More than 95% of the products sourced by the aquarium are sourced from one supplier, which is an affiliate located in the United States.

Total procurement spent on retail products was \$2.6 million (2024) and \$2.1 million (2023). The total number of suppliers was 99.

Ripley's Aquarium's food and beverage department operate the Ripley Café inside the aquarium. Total procurement spent on F&B products was \$927,000 (2024) and \$1.3 million (2023). The total number of suppliers was 12, all based in the Greater Toronto area.

The Facilities department manages the day to day building operations including Housekeeping. Total procurement spent by Facilities was \$286,728 (2024) and \$1 million (2023). The total number of suppliers was 8, all based in the Greater Toronto area.

Overall, Ripley's Aquarium buys from more than 250 suppliers.

Great Wolf Lodge

Ripley's Niagara Waterpark Resort LTD operates the Great Wolf Lodge in Niagara Falls. Niagara Water Park Properties Ltd. owns the real estate upon which we operate the lodge. Great Wolf Lodge is an exclusive indoor waterpark resort located at 3950 Victoria Avenue, containing 406 guest suites and 15 guest cottages. The waterpark boasts a one hundred thousand square foot indoor waterpark, an outdoor pool, themed restaurants, a MagiQuest live adventure game, laser tag, arcade, and other amenities.

Great Wolf Lodge is wholly owned by Jim Pattison Entertainment Ltd. The lodge is operated by an executive team including the General Manager, a Senior Director of Human Resources and Administration, and a Senior Director of Operations and Revenue.

Great Wolf Lodge's three largest departments for procurement are food and beverage, retail, and facilities. The lodge's food and beverage department is the largest department in terms of procurement and operates eight outlets including dine-in restaurants and quick-service. Total procurement spent on F&B products was \$2.16 million (2024) and \$7.36 million (2023). The total number of suppliers was 65, with approximately 100% being local.

Great Wolf Lodge's retail supply chain includes businesses that supply traditional retail products such as plush animals/toys and branded clothing. More than 85% of the products sourced for sale in the retail outlets are sourced from North American based suppliers.

Total procurement spent on retail products was \$3.15 million (2024) and \$3.40 million (2023). The total number of suppliers was 95.

The Facilities department manages the day to day building operations including Housekeeping and the Waterpark. Total procurement spent by Facilities was \$5.68 million (2024) and \$5.18 million (2023). The total number of suppliers was 346, approximately 90% of which are local.

Overall, Great Wolf Lodge buys from more than 500 suppliers.

III. POLICIES AND DUE DILIGENCE PROCESS

Through our Code of Conduct and Whistle Blower policies, we communicate our values and expectations. We are committed to evolving and improving our approach. We do not tolerate child, forced or bonded labour in any of our operations, or in the operations of our suppliers, subcontractors, and other business partners. We try, including through carrying out our due diligence and audits, to monitor the performance of our suppliers and to prevent our activities harming human rights. Our policies were most recently revised in 2014. Our relevant policies are discussed in further detail below:

Code of Conduct

We are committed to conducting our business lawfully and ethically. Our Code of Conduct is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, all employees should always act lawfully, ethically and in the best interests of Ripley's. We respect human rights and strive to meet the highest ethical business standards and international best practices for responsible business conduct.

Whistleblower Policy

We are committed to maintaining high ethical standards and legitimate business practices and wish to encourage the identification and prevention of any misconduct that may affect this commitment. The Whistleblower Policy aims to provide an avenue for employees to raise serious concerns with the reassurance that they will be protected from reprisal or victimization for whistleblowing in good faith.

Due Diligence

We expect third parties that we work with to adhere to business principles and values like our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and background checks.

To mitigate risk, we follow a due diligence approach that includes the following steps:

- Background checks of suppliers.
- Pre-qualification of suppliers or vendors that includes commitments related to financial stability, health, safety, employment, compliance with laws and regulations and/or environment.
- Contract or agreement provisions that include commitments related to health, safety, employment, compliance with laws and regulations and/or environment; and
- Monitoring and enforcement of contractual obligations related to health, safety, employment, compliance with laws and regulations and/or environment.

IV. RISK ASSESSMENT AND MANAGEMENT

The part of our business most likely to have the highest risk of forced or child labour based on current understanding and practices is our retail shop.

Ripley's Aquarium does not use a third-party risk or compliance tool since we source all our gift shop items from our affiliated company, Ripley Entertainment Inc., in the United States. However, in our sourcing agreements we include contract provisions that include commitments related to health, safety, and employment.

Great Wolf Lodge includes contract provisions in all sourcing agreements that include commitments related to health, safety, and employment.

We will continue to monitor compliance with those provisions.

V. MODERN SLAVERY REMEDIATION MEASURES

We have not identified any instances of non-compliance or ethical infringement in our operations or supply chain. If we were to identify such instances, we would contact the supplier to assess and mitigate the issue and consider whether it would be appropriate to file an external report with Public Safety Canada, the Canadian Ombudsman for Responsible Enterprise (CORE) and/or Canada's National Contact Point (NCP) for Responsible Business Conduct. To the extent appropriate we would contact Canada Border Services Agency (Border Watchline).

VI. LOSS OF INCOME – REMEDIATION MEASURES

We have taken no actions to address the loss of income for workers and families impacted by job loss resulting from the eradication of forced or child labour.

VII. TRAINING

Ripley's Aquarium and Great Wolf Lodge do not have specific, formalized training in place to understand and mitigate the risk of forced labour or child labour. However, we currently have an internal Whistleblower Policy that is signed by all current and new employees who onboard with our team. This policy promotes ethical business practices and encourages anonymous communication.

We are proactively seeking out resources and information to ensure the promotion of ethical practices that are aligned with our business values. Establishing supply chains free from forced and child labour is a shared effort, and we are committed to taking steps that help to prevent and reduce such risks.

VIII. ASSESSING EFFECTIVENESS

As part of our governance processes, we monitor compliance with our policies on an ongoing basis. We also review any concerns raised through our Whistleblower Policy and other informal mechanisms of employee feedback. To date, no significant concerns or complaints have been identified relating to forced or child labour.

We also assess the effectiveness of our policies by:

- Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour; and
- Tracking relevant performance indicators, such as levels of employee awareness, number of cases reported and solved through grievance mechanisms and number of contracts with anti-forced labour and child labour clauses.

To date we have not identified any parts of our business activities or supply chain that carries the risk of forced or child labour.

IX. APPROVAL AND ATTESTATION

This Report was approved pursuant to paragraph 4(b)(i) of the Act and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for Jim Pattison Entertainment Ltd. dba Ripley's, including its wholly owned subsidiaries Ripley's Aquarium of Canada Ltd., and Niagara Water Parks Properties Ltd. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

John H. Culver III on behalf of Jim Pattison Entertainment Ltd.

Authorized Signatory, May 31, 2025

I have the authority to bind Jim Pattison Entertainment Ltd.

John H. Culver III
John H. Culver III (Mar 4, 2025 15:07 EST)

Modern Slavery-Risk Report-final 2025

Final Audit Report

2025-03-04

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