

2024-05-30

To Whom It May Concern,

Subject: Compliance with Bill S-221: Fighting Against Forced Labour and Child Labour in Supply Chains Act

Dear Sir/Madam,

1307386 B.C. LTD. dba SUMMIT TOOLS, dba OUTILLAGE SUMMIT and dba FRASER TOOLS is a retail business. We are retailers of tools and accessories and other related goods for construction trade. Fraser Tools is importing business and imports for Summit Tools and Outillage Summit only. Approximate 90% of our purchases are from Canadian suppliers and we import approximately 10% of all our purchases from overseas.

We are writing to confirm 1307386 B.C. LTD. dba SUMMIT TOOLS, dba OUTILLAGE SUMMIT and dba FRASER TOOLS is in compliance with Bill S-211, the Fighting Against Forced Labour and Child Labour in Supply Chains Act. As part of our commitment to ethical business practices we have hiring practices that prevent and reduce the risk of forced labour and child labour within our supply chains. We are in the process of putting in place policies and procedures to identify and minimize chances of forced labour and child labour within our supply chain.

## **1. Company Policies and Standards:**

1307386 B.C. LTD. dba SUMMIT TOOLS, dba OUTILLAGE SUMMIT and dba FRASER TOOLS use recruitment channels like LinkedIn/Indeed or we use recruitment agencies to hire staff. All staff are based in Canada and fall under Canadian labour laws and regulations. 1307386 B.C. LTD. Does not employ anyone outside Canada. Our payroll is processed by a payroll company and payment to the staff goes directly into their bank accounts. Our policies are aligned with British Columbia labour standards. Our managers visit our vendors' factories overseas to minimize the risk of child labour working in factories. We are in the process of developing policies and procedures to minimize the risk of forced labour and child labour.

## **2.Risk Assessment and Due Diligence:**

Our risk is from imported products, this risk is minimized by visits of our managers to factories overseas that produce merchandise for our business. We are planning to put procedures in place for managers to assess the risk of forced labour and child labour when they visit factories overseas. This includes evaluating suppliers and subcontractors based on their geographical location, industry practices, and historical data on labour practices.

All the employees are hired voluntarily, onboarding and payroll processing minimize the risk of forced labour and child labour at all our locations.

## **3.Supplier Engagement and Contracts:**

We are planning to get a written commitment from vendors to make sure no forced labour or child labour is used and to put procedures for managers to assess the risk of forced labour and child labour when they visit factories overseas. We will engage with our suppliers regularly to ensure they understand and comply with these requirements.

## **4.Audits and Inspections:**

1307386 B.C. LTD. dba SUMMIT TOOLS, dba OUTILLAGE SUMMIT and dba FRASER TOOLS is putting procedures in place for auditing payroll records, and other documents of compliances from our vendors.

## **5. Remediation Processes:**

We have not come across any situation of forced labour and child labour in our organization and in our supply chain. We are planning to prepare a remediation process in case we find forced labour and child labour in the supply chain.

## **6. Reporting and Transparency:**

We are committed to transparency in our efforts to combat forced labour and child labour. 1307386 B.C. LTD. dba SUMMIT TOOLS, dba OUTILLAGE SUMMIT and dba FRASER TOOLS will publish an annual report detailing our progress, challenges, and future plans regarding ethical labour practices in our supply chains.

## 7. Continuous Improvement

Recognizing that the fight against forced labour and child labour is ongoing, we are committed to continuously improving our practices. We stay informed about the latest developments in labour rights and supply chain management and actively participate in industry initiatives aimed at eradicating forced labour and child labour.

We take our responsibilities under Bill S-211 seriously and are dedicated to ensuring that our supply chains are free from forced labour and child labour. Should you require any further information or clarification, please do not hesitate to contact us.

Sincerely,



Karim Punjani  
General Manager and Director, 1307386 B.C. Ltd.  
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604-294-1799

**1307386 B.C. LTD.**  
**dba SUMMIT TOOLS, dba OUTILLAGE SUMMIT and dba FRASER TOOLS**  
**Attestation of Report on Compliance with Bill S-221**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for 1307386 B.C. LTD. listed above. Based on my knowledge, and having exercised reasonable diligence, I 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.

I have the authority to bind 1307386 B.C. LTD



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Karim Punjani  
General Manager and Director, 1307386 B.C. LTD.  
May 30, 2024