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## BILL S-211 REPORT

### An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to Amend the Customs Tariff

by **GOLF PROS** for **GOLF PROS**  
par **LES PROS** pour **LES PROS**

#### Presented to:

The Government of Canada, Public Safety Canada

#### For:

**BPG Co-operative Inc.**

#### Modern Slavery Statement for the Financial Reporting Period: September 1, 2022 to August 31, 2023

This statement is made pursuant to 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. This statement outlines the approach and initiatives by BPG Co-operative Inc, to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing September 1, 2022 and ending August 31, 2023. BPG Business# 100605823

BPG Co-operative Inc. meets the criteria for being a reporting entity under section 2 of the Act as its place of business is Canada and in Canada, has at least \$20 million in assets and has generated at least \$40 million in revenue in the previous financial reporting period.

BPG Co-operative Inc. is committed to respecting human rights and ensuring our supply chain is free from forced labour and child labour.

#### Group Structure

Boutiques Pro Golf Inc. was established in 1980 as a Buying Group, registered in the Province of Quebec. In 2022, BPG transitioned to an Ontario Co-operative as BPG Co-operative Inc.

Head office is located at: 5310 Canotek Road, Unit 30, Ottawa, ON K1J 9N5.

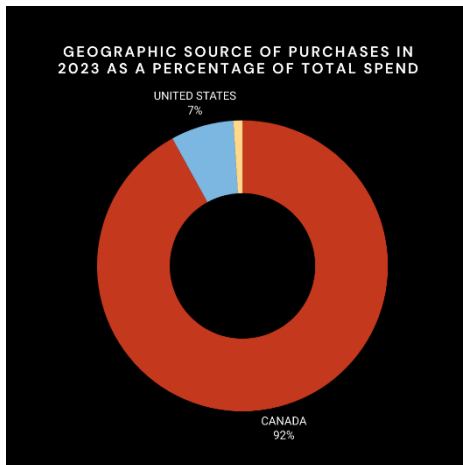


BPG Co-operative Inc. operates with 5 employees.

BPG currently has 217 Shareholders across Canada. BPG Co-operative Inc. Shareholders are owner operators of a Golf Retail Pro Shop in Canada OR are the Golf Club that operates the Pro Shop in Canada. BPG is partnered with 61 golf industry suppliers and offers a centralized billing service to its members (Shareholders). Although BPG operates in the Retail Trade space, BPG Co-operative Inc. receives and ships less than 1% of goods. BPG is invoiced by our suppliers and is responsible for payment to the suppliers. We in turn provide those same supplier invoice details to our members and bill them monthly for all invoices. The supplier is responsible for taking the orders and shipping all goods. The service BPG provides aims to simplify the business for the Golf Professional by streamlining their accounting and providing a portal for them to have access to all of their invoices from the various suppliers. BPG is compensated by the suppliers for providing one large payment per month versus potentially 217 payments to collect and process. While BPG does not produce goods, we do import and distribute a limited number of garments into Canada. This represents less than 1% of overall sales.

BPG Co-operative Inc. is governed by a Board of Directors that diligently monitor operations, supplier and member relations.

## Supply Chain



BPG Co-operative Inc. purchases 92% of its goods and services from Canadian distributors, 7% from the United States and from one supplier in Thailand.

As a co-operative, BPG represents 217 Golf facilities across Canada. Trust is imperative. To that end, BPG endeavours to partner with suppliers who are leaders in the industry, conduct themselves with integrity and share our commitment to the highest standard of business conduct.

## Policies & Due Diligence

In the previous financial year, BPG Co-operative Inc. can attest to not engaging in any form of forced labour or child labour at the BPG Head Office in Ottawa, Ontario, Canada where all employees perform their work duties onsite. With a lean workforce of only five employees, BPG can attest to the fact that employees are working voluntarily, are over the age of majority, are not working under the menace of any penalty for non-



performance, are paid a fair wage, work a standard 40-hour work week and are given at least three weeks paid vacation.

However, BPG Co-operative Inc. has not taken any steps thus far to prevent or reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by any of our suppliers. Additionally, BPG Co-operative Inc. has also not taken these same steps for the goods imported into Canada by BPG Co-operative Inc.

There are currently no policies and due diligence processes in place related to forced labour and/or child labour. Additionally, there has been no training on this subject for our five employees.

In response to Bill S-211, we have begun the important process of identifying parts of our activities and supply chains that carry a risk of forced labour or child labour being used, however there are still gaps in our assessments.

In assessing risk, BPG identified the business relationship with a garment manufacturer in Thailand, representing less than 1% of our purchases, as a potential risk. The US Department of Labor reports that garment manufacturing in Thailand is a high-risk sector with respect to forced labour and child labour. Further investigation will be conducted with this supplier and with all 61 of our current suppliers.

### **Plan of Action for financial year 2023-2024**

BPG Co-operative inc. is committed to this very important initiative to combat and bring awareness to forced and child labour globally. In this vein, BPG plans to implement policies and due diligence, perform a complete risk assessment in terms of the retail trade sector, manufacturing, with a focus on garment manufacturing, tier two suppliers and ensure compliance through contracts and audits.



### **Policy**

BPG will implement policy that reinforces our core value of treating all people with dignity and respect.

This includes a Zero Tolerance Policy for child and forced labour.

**“BPG Co-operative Inc. will not tolerate human rights abuses of any kind, including forced or child labour in our operations or in our supply chain”.**



## Guiding Principles to reinforce our Policy


(For purposes of these Principles, a “child” is anyone who is less than 15 years of age.)

- BPG expects that the suppliers with whom they do business to uphold the same standards in terms respect, dignity and a zero-tolerance policy for child and forced labour. Should a violation of these Principles become known to BPG and not be corrected, BPG will discontinue the business relationship.
- BPG will require suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains including the steps taken to ensure adherence.
- For products or manufacturing regions where a risk of forced labour or child labour is identified, BPG will ask suppliers operating in these regions specific questions related to child and forced labour.
- BPG will require all suppliers to adhere to our Principles and this language will be included in our contracts going forward.
- BPG will include awareness and explain the Principles in supplier onboarding.
- BPG will include awareness and education to all employees on our Principles and zero tolerance policy for child ad forced labour.
- BPG will implement steps to assess the effectiveness of our Principles and supplier compliance which may include a supplier audit, reviewing each suppliers’ Bill-S-211 reports, etc.

To ensure long-term success, BPG needs to correctly identify and manage potential risks to our company, including the risk of forced labour or child labour being used in our business supply chains. Assessing the effectiveness of managing that risk is a shared responsibility of our Board of Directors and management.

### Attestation

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 the entity 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.

DocuSigned by:  
  
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Ian Crebbin  
President, on behalf of the Board of Directors of BPG Co-operative Inc.  
I have the authority to bind BPG Co-operative Inc.

May 14, 2024