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# Bissett Fasteners Limited Human Rights Policy

2024





### **Bissett Fasteners Limited Human Rights Policy**

Bissett Fasteners Limited develops and produces construction materials for professional users, aiming to contribute to our community through exceptional products and services. We recognize our corporate responsibility to uphold human rights and conduct our business with social responsibility. Sustainable business practices and employee safety are integral to our corporate culture.

Our company is committed to the highest standards of ethical conduct in all aspects of our operations. This commitment is supported by robust policies and practices that ensure fair, ethical, and honest business dealings, strong governance, and compliance with applicable laws, all while demonstrating respect for human rights. We maintain full transparency and welcome auditing processes to offer comprehensive insights into our business operations.

Aligned with our core values, Bissett is dedicated to promoting human rights in the workplace. This includes respecting all individuals and fostering an environment where colleagues can achieve their full potential. Our commitment to human rights is embedded in our core values and reflected in the principles of our Ethics, Quality, and Sustainability Policy.

This human rights policy applies to all Bissett Fasteners Limited employees and locations across Canada, as well as to individuals acting on the company's behalf.



# 2023 MODERN SLAVERY STATEMENT

#### Introduction

The Company is Bissett Fasteners Limited ("Bissett"). This is the Modern Slavery and Human Trafficking Statement of the Company for the calendar year ending December 31, 2023 (the "Reporting Period").

The statement is made pursuant to S-211, an act to enact the Fighting Against Forced Labour and Child Labor in Supply Chain Act (the "Act") and describes measures in place at the Company to ensure that slavery and human trafficking is not taking place within the Company's business and supply chains. In accordance with the Act, this statement is published on the following website: https://bissettfasteners.ca/

#### Steps to prevent and reduce risks of Forced Labor and Child Labour

We consider the respect of human rights to be a fundamental corporate responsibility and a value governing all our activities. We place the highest importance on respecting human rights while conducting our business activities everywhere we operate. We expect the same from our business partners.

In general terms, we took the following steps during the Reporting Period to prevent and reduce the risk of forced labor or child labor in our business and supply chains:

- Reviewed and updated our Standards in June 2023, https://bissettfasteners.ca/about/why-bissett
- Conducted a preliminary initial internal assessment of the risks of forced labour and/or child labour in our
- supply chains to enhance our supplier Third-Party due diligence process; and

• Tested our new supplier Third-Party due diligence process, which includes modern slavery risks, with selected suppliers with the objective of testing the process and improving it as necessary.

Details of the above actions are set out in this statement.



# Structure, Activities and Supply Chains.

Headquartered in Coquitlam, BC, founded in 1929, Bissett has grown from a single location in Vancouver to Canada's largest branded fastener company for professional users. Bissett now has 11 branches and service centers across the country from British Columbia to Nova Scotia.

Bissett is a privately held Canadian incorporated company with approximately 80 employees. We strive to create a diverse and inclusive culture everywhere we operate. Bissett's products range from fasteners to pneumatic tools and compressors, packaging, and foam products. Bissett's products are manufactured all over the world to our specifications. Bissett's global supply chain consists mainly of product suppliers, providing the products as indicated above. The raw materials are procured by our suppliers around the world and vary from product to product. Most of these products are provided by suppliers with whom which Bissett has had a long-term relationship. Bissett seeks long-term relationships with major direct and indirect suppliers for the delivery of products. Within our supply chain, Bissett has built relationships with suppliers worldwide for all our products. Bissett currently does business with approximately 50 suppliers located in 8 countries. All Bissett products are packaged

in the country of origin.

#### Policies, Governance and Due Diligence processes

Bissett is committed to embedding human rights considerations into its standards, policies, governance f ramework and decision making. As such, Bissett sees the management of Environmental, Social and Governance ("ESG") risks and opportunities as an inherent part of Bissett's success as a business. Bissett regularly tracks the potential sustainability-related risks that are shaping our operating environment and develops and implements strategies to progress its performance across sustainability areas.

#### Human Rights Statement

In furtherance of Bissett's commitment to upholding human rights through the Act, Bissett reiterates our position to not use child or forced labour. In support of this commitment, we expect all employees at all levels, as well as our business partners, to act accordingly.

#### **Supplier Standards**

In line with Bissett's vision for its suppliers, we actively engage our supply chain by the adherence of its suppliers to its Supplier Standards which has been developed with recognition of the 10 principles outlined in the UNGC. The Supplier Standard, which was last updated in June 2023, details our expectations of suppliers in respect of human rights, labour, legal compliance, health and safety, the environment, anti-corruption, ethics and governance. The Supplier Standards can be found here: https://bissettfasteners.ca/about/why-bissett/

Our Supplier Standards specifically includes provisions prohibiting child labour and forced labour. Bissett will immediately cease business operations with any vendor that fails to meet these standards.



# Third Party Due Diligence Policy

While improving operational efficiency, we continue to strengthen our processes to reduce risks related to forced and child labour. In line with our Third-Party Due Diligence Process, our supply chain organization applies a risk assessment procedure prior to engaging with new suppliers and conducts reviews based on their operational risk framework.

Bissett has taken measures to strengthen the existing Third-Party Due Diligence process for supply chain by enhancing it with a comprehensive risk-based approach that improves Bissett's ability to identify and mitigate risks associated with its supply chain. Modern slavery risks are encompassed in this process and in 2023, selected suppliers went through the process with the objective of testing it and improving it as necessary.

#### **Reporting and Non-Retaliation Policy**

Should employees or suppliers have concerns regarding forced or child labour, they have a responsibility to report their suspicions. To that effect, Bissett provides multiple channels for them to report any potential breach, on a confidential basis or not, such as reporting: to colleagues, including supervisors, human resources representatives, legal services representatives, internal audit representatives or next level of management.

#### Assessing and Managing our Risk

Bissett uses a risk-based approach to assess and manage our risk of forced labour and child labour. Our approach helps us prioritize our efforts and adjust our actions. Our methodology to identify risks in our supply chain through our Third-Party Due Diligence process combines notably country risk indicators, supplier's category and type of products/services offered by the supplier. The resulting risk score determines the level of additional due diligence to be performed, including with respect to forced and child labour, and the extent of ongoing monitoring and frequency of review required.

Our methodology to identify risks is notably based on 1) whether the supplier is headquartered or its manufacturing sites are located in countries that have a low score on the corruption perception index and/or that are at risk according to the global slavery index based on the products they supply to Bissett, 2) whether the products/services come from or are delivered to one of the countries mentioned above, 3) whether Bissett is supplied with certain indirect goods and services, and 4) if the products offered by the supplier to Bissett include raw materials.

Bissett also implemented a comprehensive monitoring solution that detects global events that could potentially have an impact on its supply chain. This real-time solution helps Bissett to increase the visibility of its supply chain, to monitor activity around the world that may disrupt or affect operations, and to be more proactive when dealing with risks. Events monitored include notably natural disasters, labour disruptions, cyber-attacks, financial and geopolitical risks.

#### **Remediation Measures**

Bissett offers a reporting mechanism for our employees and suppliers to report ethical or legal violations, among other concerns. If a situation of non-compliance is identified, Bissett will work to develop and implement a corrective plan to improve and remedy the situation.



# Training

Bissett's employees receive regular tailored training on ethical topics and our policies. All new office employees are assigned an onboard training package which includes training on our standards. On an annual basis, all office employees are required to agree their abidance by our standards.

In 2024, Bissett intends to provide training to targeted audiences that will include policies and procedures geared towards identifying and preventing child and forced labour.

#### Assessing effectiveness

Bissett has in place several measures to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains. While we have not yet taken any actions to assess the effectiveness of those actions, Bissett intends to assess its effectiveness in preventing and reducing risks of forced labour and child labour in its activities and supply chains as we evolve our business practices.

#### Approval

This statement has been approved by the sole Director and the President of the Company on May 31, 2024, for the calendar year ending December 31, 2023.

Director Date: May 31, 2024

President Date: May 31, 2024

