

FORCED LABOUR IN CANADIAN SUPPLY CHAINS

OVERVIEW

Bocci is a privately owned Canadian corporation with a manufacturing location in Vancouver, BC. We sell our products in Canada and around the world. We rely on our supply chain to provide us with both raw materials and finished components to manufacture our goods.

Bocci is committed to responsible manufacturing practices that respect and uphold human rights in line with international standards and best practices. We recognize our responsibility to uphold human rights and ethical standards, and we are dedicated to taking appropriate measures to combat modern slavery.

Bocci's Supplier Code of Conduct prohibits forced and involuntary labour of any kind. The Code of Conduct reflects the international standards set out in the United Nations Guiding Principles for Business and Human Rights. All suppliers receive our Supplier Code of Conduct before we engage them, and we hold them accountable on a continual basis.

POLICIES AND STANDARDS

We work collaboratively with our suppliers to ensure they understand and comply with our commitment to combating forced labour, human trafficking and child labour. Subcontractors are subject to the same requirements as our approved suppliers. By signing our Supplier Code of Conduct, suppliers commit to compliance with legal requirements, including ensuring all work is voluntary and no forced, trafficked, illegal or prison labour has been used.

Our Supplier Code of Conduct prohibits all forms of child labour throughout our supply chain.

We comply with all relevant laws and regulations concerning modern slavery, human trafficking and child labour in the jurisdictions where we operate.

DUE DILIGENCE, MONITORING, REMEDIATION AND ACCOUNTABILITY

We have a zero-tolerance approach to modern slavery, human trafficking, and child labour in all its forms. We will not engage in or tolerate any practices that involve slavery, forced labour, servitude, human trafficking or child labour within our operations or supply chains.

We conduct due diligence on our supply chains to identify and assess any country risks of modern slavery, human trafficking, or child labour. Each new potential supplier undergoes a pre-onboarding assessment that includes a review of the supplier's facility, employment practices, and labour conditions. All suppliers must disclose any subcontractors they will use.

We provide internal training and awareness programs to our employees who have direct responsibility for supply chain management to ensure they understand the risks of modern slavery, human trafficking and child labour and know how to identify and report any concerns.

Bocci conducts scheduled and unscheduled visits to our suppliers to monitor compliance with our Supplier Code of Conduct. We maintain ongoing communication with suppliers and foster close working relationships. Supplier compliance with our Supplier Code of Conduct is reviewed on an annual basis and reported to our management and suppliers.

Known or suspected violations of the Supplier Code of Conduct must be reported. We will work collaboratively with our suppliers to develop a corrective action plan. To minimize income loss to families, if child labour has been reported, the job will be offered to an immediate family member who is of legal age. If we have exhausted all attempts at remediation and a supplier is unable or unwilling to make improvements, Bocci may decide, as a last resort, to terminate our business with the supplier. In this case, we will ensure that the exit is responsible and ensure that the interests of the workers are upheld.

Bocci is committed to acting ethically and with integrity in all our business dealings and relationships. We believe that by working together with our employees and suppliers, we can make a meaningful contribution to the fight against modern slavery, human trafficking and forced labour. We regularly review and update our policies and procedures to reflect best practices and emerging standards.

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 or entities 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.

Report Date: May 31, 2024

Covering Period: January 1, 2023 – December 31, 2023

I have the authority to bind Bocci Design & Manufacturing Inc.



Randall Bishop
President

BOCCI SUPPLIER CODE OF CONDUCT

Bocci Design & Manufacturing Inc., including all of its brands, subsidiaries and affiliates (the “Company”, “we” or “our”) operates a global business. We are committed to conducting our business with integrity, transparency, and respect for human rights, and procuring products and services worldwide in accordance with applicable laws and regulations and ethical business practices. The Company expects the companies and individuals from whom it procures products and services to comply with all applicable laws and regulations and to be socially responsible citizens in the countries and communities in which they operate.

We have enacted the following Supplier Code of Conduct, and expect our suppliers to comply with this Code. We are committed to supporting business partners in meeting these standards while having the courage, if necessary, to end relationships with those who are unwilling to meet them.

Under this Code, “suppliers” are any third parties that provide goods or services, including raw materials, to the Company. This Supplier Code of Conduct specifies what we require from our suppliers, their subcontractors and other business partners.

1. Legal Compliance:

Suppliers must comply with all applicable laws, regulations, and international standards in the countries where they operate.

2. Labour Practices:

Forced Labour: Suppliers shall not use forced or involuntary labour in any form, including prison labour, indentured labour, or human trafficking. To that end, suppliers must not require workers to lodge a deposit, original passport, or original identity papers as a condition of employment. Employee’s freedom of movement must be respected. Suppliers must ensure that work is voluntary and employees are free to end their employment without penalty after providing reasonable notice. Suppliers must make full disclosure to workers about the terms and conditions of their employment.

Child Labour: Suppliers shall not employ individuals under the legal working age and/or the compulsory schooling age defined by applicable laws and international standards. Suppliers shall not require persons under the age of 18 to carry out hazardous work or night work.

Working Conditions: Suppliers must provide a safe and healthy working environment for their employees, including proper ventilation, lighting, sanitation facilities, and protection from hazardous materials. Based on risk analysis, suppliers must take all necessary steps to prevent accidents and injury. This includes having systems to detect, avoid and respond to potential risks to the health and safety of all persons present on your premises.

Fair Wages: Suppliers must pay their employees fair wages that meet or exceed the legal minimum wage requirements and provide benefits in accordance with local laws and industry standards.

Working Hours: Suppliers must comply with legal limits on working hours and provide employees with rest periods and overtime compensation as required by law.

3. Ethical Business Practices:

Bribery and Corruption: Suppliers shall not engage in bribery, corruption, or unethical practices in their dealings with public officials or private entities.

Conflicts of Interest: Suppliers must disclose any potential conflicts of interest and refrain from engaging in activities that may compromise their integrity or impartiality.

Fair Competition: Suppliers must compete fairly and ethically in the marketplace, refraining from anti-competitive practices such as price-fixing, collusion, or market manipulation.

Trade Compliance: Suppliers are expected to ensure compliance with the applicable international trade control laws and regulations, including import/customs laws, sanctions, export controls, and anti-boycott laws in all jurisdictions. Suppliers must not

transact with individuals or entities if they know, should have known, or suspect that such transactions violate applicable import/customs laws, sanctions or export controls.

4. Human Rights and Diversity:

Non-Discrimination: Suppliers must treat all employees and job applicants fairly and equally, regardless of race, colour, ethnicity, nationality, religion, gender, sexual orientation, disability, or any other protected characteristic.

Respect for Human Rights: Suppliers must respect the human rights of their employees and communities, including the right to freedom of association, collective bargaining, and non-discrimination.

5. Monitoring and Compliance:

Compliance Reporting: Suppliers must maintain accurate records of their compliance with this Code of Conduct and provide access to relevant documentation upon request.

Audit and Assessment: Bocci Design & Manufacturing Inc. reserves the right to conduct audits and assessments of supplier facilities to verify compliance with this Code of Conduct. Suppliers are expected to cooperate fully with these audits and address any identified non-compliance issues promptly.

6. Continuous Improvement:

Suppliers are encouraged to continuously improve their performance per the principles outlined in this Code of Conduct. Bocci Design & Manufacturing Inc. is committed to collaborating with suppliers to support their sustainability and social responsibility efforts.

By entering into a business relationship with Bocci Design & Manufacturing Inc., suppliers agree to abide by this Supplier Code of Conduct and demonstrate their commitment to ethical business practices and corporate responsibility.

7. Conflict of Interest

A conflict of interest arises when an entity or individual's personal interests interfere or may interfere with the Company's interests. Suppliers must act in accordance with sound business judgement, not motivated by personal interest or gain.

Any situation, including any relationship, employment affiliation, investment or transaction, that creates or appears to create a conflict of interest between the supplier or supplier employees' personal interests and the interests of the Company must be avoided. A conflict of interest may arise when a supplier employs, or is partially owned by, a Bocci employee or the Bocci employee's family member(s) or close friend(s). The best way to avoid conflict of interest situations is to immediately disclose to the Company any situation that has the potential to be misunderstood by others, including other employees, customers, and suppliers.

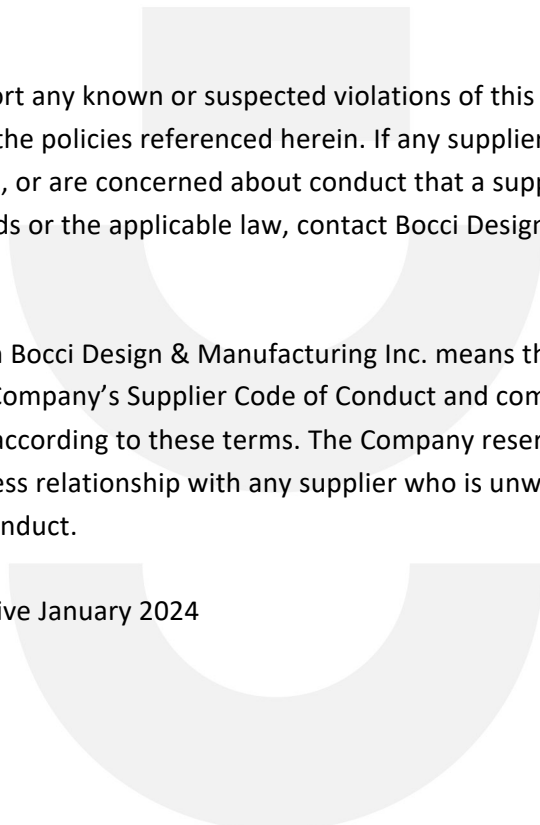
8. Confidential and Proprietary Information

Suppliers must safeguard the Company's confidential and proprietary information, by keeping it secure, limiting access to those who have a need to know to perform their jobs and avoiding discussion of confidential information in public areas. The obligation to preserve the Company's confidential and proprietary information and that of its employees, personnel, agents, representatives, business partners, suppliers, vendors and customers is ongoing, even if the relationship between the Company and the supplier is terminated. The supplier must take all necessary precautions to make sure that the information is not accessed, destroyed, lost, stolen, wrongly disclosed, altered, or otherwise illegally used.

9. Communication

Suppliers must communicate the principles and standards outlined in this Code to their workers, as well as subcontractors, agents, and representatives, and take appropriate steps to ensure compliance.

10. Known or Suspected Violations



Suppliers must report any known or suspected violations of this Supplier Code of Conduct, including the policies referenced herein. If any suppliers have questions, need to make disclosures, or are concerned about conduct that a supplier believes violates the Company's standards or the applicable law, contact Bocci Design & Manufacturing Inc. immediately.

Doing business with Bocci Design & Manufacturing Inc. means that the supplier acknowledges the Company's Supplier Code of Conduct and commits to doing business with the Company according to these terms. The Company reserves the right to terminate its business relationship with any supplier who is unwilling to comply with this Supplier Code of Conduct.

Updated and Effective January 2024