

2023 Report under Fighting Against Forced Labor and Child Labor in Supply Chains Act

1. Introduction

This document constitutes the Annual Report pursuant to section 11(1) of the *Fighting Against Forced Labour and Child Labour in Supply Chain Act* and is filed on behalf Bothwell-Accurate Co. Inc. for the financial year ending [December 31, 2023].

Conducting business with integrity is a fundamental principle within our organization. The report provides an overview of the actions that Bothwell-Accurate Co. Inc. has taken and plans to take to assess and address risks of forced and child labour in its supply chain.

Forced labor and child labor, each as defined in the Act, are crimes and serious violations of human rights. Bothwell-Accurate Co. Inc. recognizes the key role that we have in adhering to the highest ethical standards in our operations and supply chains that support these.

2. Our Structure, Operations, and Supply Chains

Bothwell-Accurate Co. Inc. is a corporation operating in the construction industry. Our organizational structure is designed to support efficient operations, high-quality product delivery, and robust compliance with ethical standards. The Company structure encompasses the President of the company that oversees overall management, including executive leadership that handle daily operations.

As a construction services company, we operate multiple construction sites, and our operations include:

- Construction services: Providing comprehensive construction solutions including roofing, waterproofing, cladding and glazing.
- Construction Materials: Procuring high-quality materials, such as roofing shingles, waterproofing membranes, and other building supplies.
- Equipment and Machinery: Sourcing necessary construction equipment and machinery for projects.
- Logistics: Handling the transportation and delivery of materials and equipment to construction sites.

The supply chain predominantly consists of local manufacturers and suppliers, within Canada, however we import, sell, and distribute specific construction materials that are not available within Canada, to support our construction operations. Our supply chain includes:

- Raw Material Suppliers: Providing essential materials used in our construction projects.
- Component Manufacturers: Producing parts and components that are integrated into our construction solutions.

As a company, we are committed to complying with all applicable laws and regulations everywhere that we do business and are committed to preventing the use of child and forced labor. Our out of country suppliers are reputable suppliers that manufacture products within the [United States of America] and we will work with them to implement our Supplier Code of Conduct in 2024.

3. Policies, due diligence, and controls

Bothwell-Accurate Co. Inc. will not condone or engage in the unlawful employment or exploitation of children or forced labor in the workplace. We adhere to all provincial, federal and local laws concerning the lawful employment of children and others. The use of forced labor or child labor where any work or service that a worker performs involuntarily under threat, violence, or penalty is prohibited.

We adhere to all federal, provincial and local legislation and laws concerning the minimum age and working conditions of all our employees. We will seek to create a policy to enforce the principles of the Act to become a requirement for our suppliers to adhere to as well.

4. Risk Assessment Methodology and Results of Assessment

In 2024, Bothwell-Accurate Co. Inc. will implement a supplier code of conduct to distribute to our supply chain. Today all goods imported and sold are purchased from reputable companies. We will continually review our policies to reduce any potential act of modern slavery.

5. Risks of forced labor and child labor in our operations and supply chains

Bothwell-Accurate Co. Inc. is not aware of any forced labor and child labor going on in our activities or our current supply chain.

6. Remedial Action Taken during 2023

Bothwell-Accurate Co. Inc. has not identified instances of forced or child labor in its activities or supply chains. As such, no remediation measures have been taken. We will continue to assess our activities and supply chains and consider appropriate means of remediation for forced or child labor should they arise.

7. Our Remediation Processes

Bothwell-Accurate Co. Inc. is committed to protecting whistleblowers who acted in good faith, via no disciplinary action; no legal proceedings; and no retaliation. [Currently, we do not have an ethics hotline available. In 2024, we plan to establish an ethics hotline, allowing employees to report breaches confidentially.]

In respect of Canadian government guidelines, Bothwell-Accurate Co. Inc. does not employ any migrant or child labor.

8. Our remediation actions for the loss of income to the most vulnerable families that result from any measure taken to eliminate forced labor and child labor from our operations and supply chains.

Bothwell-Accurate Co. Inc. is not currently aware of any instance where its efforts to prevent and reduce the risk of forced or child labor in its activities or supply chains contributed to a loss of income for vulnerable families.

9. Our Training

In 2024, we will be adding child labor content to our annual training and employee handbook. [Our Code of Ethics is within the current employee handbook and is a condition of working for Bothwell-Accurate Co. Inc.]

10. Assessing our effectiveness

Bothwell-Accurate Co. Inc. does not yet have a formal process for measuring effectiveness in the mitigation and prevention of forced and child labor risks other than a periodic review of our activities, suppliers, and supply chain. Going forward, we will work to develop awareness and a more formal process.

11. Our consultation and governance process

Bothwell-Accurate Co. Inc. believes in a high standard of governance, ethics, compliance, and risk management. We work closely with our teams and strategic suppliers and seek to ensure that those associated with Bothwell-Accurate Co. Inc. do the same.

12. Conclusion


Bothwell-Accurate Co. Inc. is committed to preventing forced labor and child labor from taking place in our business and our supply chains. We will continue to review all our policies and practices to make continued awareness and prevent the use of forced labor and child labor in our supply chain and operations.

13. Approval and Attestation

This report was approved by the governing body of Bothwell-Accurate Co. Inc. on May 31, 2024, pursuant under section 11(4)(b)(ii) of the Act.

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.

Dated this 31st day of May 2024

Per:  _____

Krystal Davey

Director of Corporate Operations

I have the authority to bind Bothwell-Accurate Co. Inc.