



**To:** Ministry of Public Safety Canada  
**Subject:** **Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211)**  
**From:** Bradford White Canada  
**Date:** May 17, 2024

This report is intended to demonstrate Bradford White Canada's compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act, formerly known as Bill S-211.

Bradford White Canada ("**The Company**"), located in Halton Hills, ON, Canada, is a wholly owned subsidiary of Bradford White Corporation ("**Parent Company**"), with corporate headquarters located in Ambler, PA, USA. The Company sells and distributes water heaters, boilers, and storage tanks throughout Canada. The primary suppliers to The Company are The Parent Company and its subsidiaries:

- The Parent Company supplies water heaters and storage tanks; Manufacturing operations located in Middleville, MI, USA
- Niles Steel Tank (Niles, MI), Parent Company's wholly owned subsidiary, supplies storage tanks; and
- Laars Heating Systems (Rochester, NH and Monticello, MN), Parent Company's wholly owned subsidiary, supplies boilers.

All items supplied to The Company by The Parent Company and its subsidiaries are assembled in the USA (Middleville, MI; Niles, MI; Rochester, NH, and Monticello, MN).

The Company currently has no published policy documents for due diligence processes in relation to forced labour and child labour. However, all employees of The Company are legally employed, voluntarily, and consistent with Canadian employment and workplace safety laws and regulations.

Presently, there is very little to no risk of forced or child labor within Company or its supply chain. As indicated above, the suppliers to The Company are U.S. companies, with all manufacturing operations occurring within the U.S., and all employment complying with U.S. employment and workplace safety laws. All operations also reside in "at will" states, where the employment is voluntary and can be terminated at any time by the employee. As such, there are no measures being taken to remediate forced labour or child labour, or the loss of income to the most vulnerable families that results from the measures taken to eliminate the use of forced labour and child labour, as not applicable.

At this time, there is no formal training provided to employees on forced labour and child labour. All employment processing, including hiring, compensation, terminations, and the like are administered by the Human Resources Department of The Parent Company and The Company. These activities are conducted in compliance with all relevant employment laws. To raise their employees' awareness and appreciation of the global forced labour and child labour issues, The Company and Parent Company utilize the following resources,

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among others:

- *The UN Guiding Principles on Business and Human Rights;*
- *The OECD Due Diligence Guidance for Responsible Business Conduct;* and
- *The ILO Combating Forced Labour: A Handbook for Employers and Business.*

The Company and Parent Company comply with US and Canadian employment and workplace safety laws and regulations. Further, The Company's primary supply chain is based in the U.S. For these reasons, The Company does not presently use a formalized process to assess its effectiveness in ensuring that forced labour and child labour is not being used in its business and supply chains. There is little to no risk of forced labour and child labour being used in the supply chain of The Company.

Sincerely,

*Jonathan Soler*

Jonathan Soler  
Head of Sustainability and Compliance – Bradford White Corporation

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