Reporting Entity's legal name: Cycles Lambert Inc.

Financial Reporting Year: January 1, 2023 – December 31, 2023

**Business Numbers:** 891763781RP0001

891763781RP002

Joint Report: No

Reporting obligations in other jurisdictions: None

**Entity Categorization:** 

Sector/Industry: Wholesale Distribution

Location: Levis, Quebec

### **Purpose of Report**

This report is prepared to demonstrate Cycles Lambert Inc's compliance with Canadian laws regarding child labour and trafficking. It outlines our policies and practices to prevent and address these issues throughout our operations and supply chain.

## **Scope of Report**

This report covers all of Cycles Lambert Inc's operations including internal policies, employee training, supplier management and incident response processes.

### **Company Overview**

Cycles Lambert, Inc is a wholesale distributor of bicycle parts and accessories throughout Canada. Cycles Lambert Inc works to ensure that no child labour or trafficking occurs within its operations and supply chains. This includes review and implementation of policies, developing and implementing supply chain audits, and immediately reporting any suspected violations.

### **Policies & Procedures**

Cycles Lambert Inc strictly prohibits the employment of individuals below the legal working age. Our practice includes:

- Verification of age documents during the hiring process
- Employment restrictions and conditions for minors as per provincial regulations.

Cycles Lambert Inc includes the following in regard to human trafficking:

- Zero tolerance for any form of trafficking in our operations
- In 2024 we will begin training our employees to ensure they are aware of the signs of child labour and trafficking as well as the reporting procedures for suspected cases.
- In 2024 we will begin to require all our suppliers and business partners to adhere to our child labour and anti-trafficking policies. This should include:

- Language in our contracts and agreements signed by our supply chain partners.
- Audits to ensure they adhere to our standards.

## **Implementation and Monitoring:**

Cycles Lambert Inc will develop a periodic risk assessment tool to identify vulnerabilities in our operations and supply chains related to child labour and trafficking. We will conduct background checks as required on all new hires and will expand that program to include our suppliers. We will implement regular audits with our supply chain partners. We provide multiple channels for reporting suspected child labour or trafficking including an anonymous hotline provided to all employees as well as a direct reporting channel to HR, a member of executive management or owner reporting.

If we identify cases where violations have occurred, we will take immediate action to remove minors from work and provide necessary support. We will correct practices and impose penalties on suppliers found in violation. We will immediately notify the proper authorities and work closely with them to address any confirmed cases of child labour and trafficking.

## **Performance Metrics and Reporting:**

## **Key Performance Indicators (KPIs)**

We will use the following KPIs to measure the effectiveness of our policies:

- Number of reported and resolved cases.
- Compliance rates among supplies
- Employee training completion rates

# **Annual Reporting**

We will produce a calendar year annual report that includes:

- Data on incidents, investigations, and outcomes
- Analysis of trends and areas for improvement

### **Continuous improvement**

Cycles Lambert Inc is committed to continuous improvement and will review and update our policies based on performance data and feedback to ensure ongoing compliance and effectiveness.

### **Challenges and Future Plans**

# **Challenges Faced**

Some challenges that we encounter will include:

- Ensuring compliance across a diverse and global supply chain
- Keeping up with evolving legal requirements

#### **Future Initiatives**

To address these challenges, we plan to:

- Continually enhance our training programs
- Adapt the frequency and scope of our supplier audits.
- Where needed, implement new technologies for better monitoring and reporting.

### Conclusion

Cycles Lambert Inc remains committed to preventing child labour and trafficking. Our robust policies and proactive measures reflect our deduction to ethical business practices.

We reaffirm our commitment to combating child labour and trafficking and will continue to improve our practices to ensure full compliance.

#### 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 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 o8sted above.

Patrick McGinnis

Resident & CEO

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5/31/2024

I have the authority to bind Cycles Lambert dba HLC.