

# JOHN BROOKS COMPANY LIMITED

2625 Meadowpine Blvd, Mississauga, ON L5N 7K5

Phone: 905-567-9222 • Fax: 905-567-5015

## The Supply Chains Act Report 2022-2023

### Introduction

Forced labour can be found in every country and every sector. The International Labour Organization estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through the global supply chains of businesses.

There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions and doing businesses in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

The measures introduced (the “**Supply Chains Act**”), aim to increase industry awareness and transparency and drive businesses to improve practices.

John Brooks Company Limited / John Brooks Compagnie Limitee (“**JBCL**”) is defined as an “Entity” under the Supply Chains Act and, therefore must submit an annual report to the Minister of Public Safety. The report must detail the steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used by JBCL in our supply chains.

All reports will be made available to the public in two ways:

- In a prominent location on JBCL’s website
- In an electronic registry on the Public Safety Canada’s website

The following information uses the Minister’s online questionnaire as the template for the report.

## Questionnaire Responses

#	Question	Response
1	This Report is for...	An entity
2	Legal Name of the reporting entity	John Brooks Company Limited / John Brooks Compagnie Limitee
3	Financial Reporting Year (Start Date)	January 1, 2023
4	Financial Reporting Year (End Date)	December 31, 2023
5	Is this a revised version?	No
6	Business number(s)	868815846RC0005
7	Is this a joint report?	No
8	Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?	No
9	Which of the following categorizations applies to the entity?	<p>The entity has a Canadian business presence:</p> <ul style="list-style-type: none"> <li>• Has a place of business in Canada</li> <li>• Does business in Canada</li> <li>• Has assets in Canada</li> </ul> <p>The entity meets the size-related thresholds:</p> <ul style="list-style-type: none"> <li>• Has at least \$20 million in assets for at least one of its two most recent financial years</li> <li>• Has generated at least \$40 million in revenue for at least one of its two most recent financial years</li> </ul>
10	Which sectors or industries does the entity operate in?	Other, please specify: Industrial Equipment Supplier
11	In which country is the entity headquartered or principally located?	Canada
12	In which province or territory is the entity headquartered or principally located?	Ontario
13	Government Institutions only	Not applicable

## Annual Report

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#	Question	Response
1	What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity?	Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily  Developing and implementing child protection policies and processes
2	Please provide additional information describing the steps taken (if applicable)	Not applicable
3	Which of the following accurately describes the entity's structure?	Corporation
4	Which of the following accurately describes the entity's activities?	Selling goods. These activities take place: <ul style="list-style-type: none"> <li>• in Canada</li> <li>• outside Canada</li> </ul> Distributing goods. These activities take place: <ul style="list-style-type: none"> <li>• in Canada</li> <li>• outside Canada</li> </ul> Importing into Canada goods produced outside Canada
5	Has the organization identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?	No, we have not started the process of identifying risks
6	Please provide additional information on the entity's structure, activities and supply chains	John Brooks Company Limited / John Brooks Compagnie Limitee is structured as a corporation with operations primarily in Canada. Our organizational structure includes various departments dedicated to the sales and distribution of fluid handling solutions such as pumps, spray, valves, and filtration systems. We collaborate with numerous manufacturers globally, ensuring a steady supply of high-quality products. As of April 30, 2024, our headcount is 239 employees. Our operations and partnerships are both national and international.

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		<p>We focus on distributing and importing a diverse range of fluid handling equipment from international manufacturers, tailored to meet industrial and municipal needs both within Canada and potentially overseas.</p> <p>Our supply chain is intricate, involving various suppliers and service providers from multiple countries. These partners contribute to the final products that we offer in Canada. At John Brooks Company Limited / John Brooks Compagnie Limitee, we are committed to maintaining ethical business practices and ensuring the integrity of our supply chain, which includes adhering to legal standards and avoiding any involvement with illegal labour. Our approach reflects our dedication to quality and ethical business conduct.</p>
7	Does the organization currently have policies and due diligence processes in place related to forced labour and/or child labour?	Yes
8	If yes, which of the following elements of the due diligence process has the organization implemented in relation to forced labour and/or child labour?	<p>Embedding responsible business conduct into policies and management systems</p> <p>Ceasing, preventing or mitigating adverse impacts</p> <p>Tracking implementation and results</p> <p>Communicating how impacts are addressed</p>
9	Please provide additional information on the organization's policies and due diligence processes in relation to forced labour and child labour (if applicable)	Policy attached
10	Has the organization identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries?	<p>Other, please specify:</p> <p>No, we have not started the process of identifying risks.</p>
11	Please provide additional information	Not applicable.

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	on the parts of the organization's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the organization has taken to assess and manage that risk (if applicable)	
12	Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains?	Not applicable, we have not identified any illegal labour in our activities and supply chains.
13	Please provide additional information on any measures the organization has taken to remediate any forced labour or child labour (if applicable)	Not applicable
14	Has the organization taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?	Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of illegal labour in our activities and supply chains.
15	Please provide additional information on any measures the organization has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities	Not applicable

	and supply chains (if applicable)	
16	Does the organization currently provide training to employees on forced labour and/or child labour?	Yes
17	If yes, is the training mandatory?	Yes, the training is mandatory for all employees.
18	Please provide additional information on the training the organization provides to employees on forced labour and child labour (if applicable)	Not applicable
19	Does the organization currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?	No
20	Please provide additional information on how the organization assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable)	Not applicable


**Attestation**

This report has been approved by the John Brooks Company Limited / John Brooks Compagnie Limitee board of directors on 27<sup>th</sup> of May, 2024.

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.

**JOHN BROOKS COMPANY LIMITED / JOHN BROOKS  
COMPAGNIE LIMITEE**

Per:

DocuSigned by:  
  
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Name: Cory Minkhorst

Title: Secretary

*I have authority to bind John Brooks Company Limited / John  
Brooks Compagnie Limitee*

## Anti-Modern Slavery Policy





Policy	Anti-Modern Slavery Policy
Policy Owner	People & Culture Team
Policy Authorized	Cory Minkhorst, Vice President – People & Operations
Last Reviewed	July 15, 2023
Current Version	1.0
Changes	

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## 1. Purpose

At John Brooks, we staunchly oppose all forms of slavery, servitude, forced labour, and human trafficking. We understand that modern slavery is a global issue, and we are committed to conducting our business in a manner that respects the rights and dignity of all individuals. This policy highlights our commitment to ensuring that there is no modern slavery within our business operations or our supply chains.

## 2. Policy Principles:

### 2.1. **Zero Tolerance:**

We maintain a zero-tolerance approach to modern slavery in all its forms and will take necessary steps to ensure that our operations and supply chains are free from such practices.

### 2.2. **Compliance with Laws:**

We pledge to act ethically and with integrity, ensuring compliance with all Canadian and international laws and regulations pertaining to modern slavery.

### 2.3. **Due Diligence:**

We will conduct regular risk assessments and due diligence on our business operations and supply chains, especially when partnering with new suppliers or entering new markets.

### 2.4. **Awareness and Training:**

We will educate our employees, suppliers, and partners on the risks of modern slavery, equipping them with the necessary tools and knowledge to identify and address potential concerns.

### 2.5. **Reporting Mechanism:**

We will establish and maintain an effective mechanism for employees and external stakeholders to report suspicions or evidence of modern slavery within our operations or supply chains, ensuring anonymity and protection for whistleblowers.

### 2.6. **Remediation:**

If any instances of modern slavery are identified within our operations or supply chains, we will take swift corrective action, including providing support for victims and reviewing the effectiveness of our preventive measures.

## 3. Implementation and Review:

### 3.1. **Responsibilities:**

The People & Culture team will oversee this policy's implementation, review, and reporting, with regular audits from third-party organizations to ensure objectivity.

### 3.2. **Review:**

This policy will be reviewed annually, with interim revisions as necessary to respond to feedback, regulation changes, or emerging best practices.



**3.3. Reporting:**

John Brooks will produce an annual Modern Slavery Statement, outlining our actions and progress in ensuring our operations and supply chains are free from modern slavery.

**4. Conclusion:**

At John Brooks understands that the fight against modern slavery is ongoing. Our commitment is unwavering, and we aspire to lead in our industry as a beacon of ethical and responsible business practices. Together with our employees, suppliers, and partners, we are dedicated to ensuring a world where the rights and dignity of every individual are upheld.

**5. Point of Contact**

For any queries or clarification related to this policy, please connect to the People & Culture team.

**6. Discretionary**

In case of any disagreement or exception, the final discretion will be of Cory Minkhorst, Vice President - People & Operations.

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