

REPORT UNDER BILL S-211 – FORCED LABOUR & CHILD LABOUR

This is a joint report under Bill S-211 (the “Act”) for the fiscal year ended January 31, 2024 for the following entities (referred to below collectively as “LynCar Waterline”), with the following business numbers:

LynCar Holdings Inc. 811894450
LynCar Canada Inc. 833316847
LynCar Fire Inc. 833316649
LynCar Inc. 837053537
Waterline Products Co. Limited 105592075

LynCar Waterline is a distributor of plumbing, fire sprinkler and other industrial products. All our employees and operations, and virtually all our customers, are in Canada. Our suppliers are spread among many countries, including China.

We are aware of reports of the existence of child labour and/or forced labour in China and this represents the principal risk of child/forced labour being used for goods entering Canada through our business activities.

LynCar Waterline’s sourcing activities are carried out by a very small number of senior executives. Only two individuals have responsibility to visit our offshore factories; and since COVID only one individual has actually done so. These individuals are aware of the risks of child/forced labour, and when visiting our suppliers they attempt to confirm in person, with their own eyes and by asking questions, that our suppliers (and their upstream suppliers) are not engaging in child labour or forced labour. We try to visit our suppliers regularly, and the interruptions of this presented by COVID have been largely overcome.

To date we have not seen any evidence of child labour or forced labour in our supply chains, and have not had to remediate any.

We have deliberately avoided adopting detailed written policies or contracts addressing this issue. In light of the way that business is conducted in China, we believe that addressing this issue in such a manner would not be “worth the paper its written on”. Moreover, we do not believe that training our employees would add any value, since only the senior leadership actually visits our offshore suppliers. So in the circumstances, we believe that our current approach is the most effective option.

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.



Jay Heller, Co-President of each entity listed above
March 15, 2024

I have the authority to bind each entity listed above