
Bill S211 - The Fighting Against Forced Labour and Child Labour in Supply Chains Act – Report Requirement

Entity: White Cap Supply Canada Inc.

Business Number: 811465368

Fiscal Year: Fiscal Year 2024 – January 29, 2024- February 2, 2025

Submitted: 31 May 2024

NOTES: "Green Highlights" are the responses, where relevant, for White Cap Supply Canada Inc.; "Not Applicable" questions have been crossed out.

Identifying information

Questions marked with an asterisk (*) are mandatory.

1. *This report is for which of the following? (Required)

- Entity - White Cap Supply Canada Inc.
- Government institution

2. *Legal name of reporting entity or government institution (Required) - White Cap Supply Canada Inc.

3. *Financial reporting year (Required) – Fiscal Year 2024 ending January 29, 2024

4. *Is this a revised version of a report already submitted this reporting year? (Required)

- Yes
- No

4.1 ~~*If yes, identify the date the original report was submitted. (Required) – na~~

~~4.2 *Describe the changes made to the original report, including by listing the questions or sections that were revised (1,500 character limit). (Required) — na~~

5. For entities only: Business number(s) (if applicable): 811465368

6. For entities only: *Is this a joint report? (Required)

- Yes
- No

~~6.1 *If yes, identify the legal name of each entity covered by this report. (Required) — na~~

~~6.2 Identify the business number(s) of each entity covered by this report (if applicable). — na~~

7. For entities only: *Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Required)

- Yes
- No

~~7.1 *If yes, indicate the applicable law(s). Select all that apply. (Required) — na~~

8. For entities only: *Which of the following categorizations applies to the entity? Select all that apply. (Required)

- Listed on a stock exchange in Canada - No
- Canadian business presence (select all that apply):
 - Has a place of business in Canada - Yes
 - Does business in Canada - Yes
 - Has assets in Canada - Yes
- Meets size-related thresholds (select all that apply):
 - Has at least \$20 million in assets for at least one of its two most recent financial years - Yes
 - Has generated at least \$40 million in revenue for at least one of its two most recent financial years - Yes
 - Employs an average of at least 250 employees for at least one of its two most recent financial years - Yes

9. For entities only: *Which of the following sectors or industries does the entity operate in? Select all that apply. (Required)

- Agriculture, forestry, fishing and hunting

- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing – MBU (Vaughan), Fabrication (Winnipeg, Edmonton)
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- Other, please specify:

10. For entities only: *In which country is the entity headquartered or principally located?
(Required) - Canada

10.1 If in Canada: *In which province or territory is the entity headquartered or principally located?
(Required) - ONTARIO

~~11. For government institutions only: *Is this a report for a federal Crown corporation or a subsidiary of a federal Crown corporation? (Required) – na~~

~~11.1 *If yes, which of the following sectors or industries does the Crown corporation or subsidiary operate in? Select all that apply. (Required) – na~~

~~11.2 *If yes, in which province or territory is the Crown corporation or subsidiary headquartered or principally located? (Required) – na~~

Annual Report

Reporting for entities

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? Select all that apply.
(Required)

- Mapping activities
- Mapping supply chains
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Developing and implementing an action plan for addressing forced labour and/or child labour
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- Developing and implementing child protection policies and processes
- Developing and implementing anti-forced labour and/or -child labour contractual clauses
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Auditing suppliers
- Monitoring suppliers
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
- Developing and implementing grievance mechanisms
- Developing and implementing training and awareness materials on forced labour and/or child labour
- Developing and implementing procedures to track performance in addressing forced labour and/or child labour
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour
- Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks
- Information not available for this reporting period
- Other, please specify:

2. Please provide additional information describing the steps taken (if applicable) (1,500 character limit).

- At White Cap we are committed to adhering to all of Canada's laws and regulations, including the Fighting Against Forced Labour and Child Labour in Supply Chains Act. White Cap has no child labour or forced labour in its operations, nor have we identified the use of child labour or forced labour in our supply chain. Should child labour or forced labour be identified, we would take prompt remedial action to address the concern.
- White Cap requires its suppliers to execute contracts prohibiting them from using forced labour or workers who are under minimum working age requirements." In addition, White Cap engages a third-party organization to onboard new suppliers, including auditing their corporate social responsibility policies and practices. Among other topics, the audit includes questions regarding

the supplier's use or history of use of forced labour and child labour. Finally, White Cap engages with internal stakeholders and outside counsel to assess whether there are any risks of child labour or forced labour being used in our organization or supply chains.

3. *Which of the following accurately describes the entity's structure? (Required)

- Corporation - Corporation
- Trust
- Partnership
- Other unincorporated organization

4. *Which of the following accurately describes the entity's activities? Select all that apply. (Required)

- Producing goods (including manufacturing, extracting, growing and processing)
 - in Canada
 - outside Canada
- Selling goods
 - in Canada
 - outside Canada
- Distributing goods
 - in Canada
 - outside Canada
- Importing into Canada goods produced outside Canada
- Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

5. Please provide additional information on the entity's structure, activities and supply chains (1,500 character limit).

- Structure:
 - White Cap Supply Canada Inc. is a corporation based out of Vaughan, ON; the business (Business Number: 811465368) is registered with the Province of Nova Scotia.
 - The Company's parent company is "White Cap Supply Holdings, LLC" based out of Norcross, Georgia, USA, and has approximately 9,371 employees.
 - White Cap Supply Canada Inc has 1 President, 6 Functional Directors (Operations, HR, Category Management, Finance, National Sales, Field Sales, and Purchasing) and 7 District Managers across the country.
 - Currently White Cap Supply Canada has approximately 1110 employees in 8 Canadian provinces including BC, AB, SK, MB, ON, PEI, NS and NB.
 - White Cap Supply Canada Inc. is an "entity" according to the Act as it is a Canadian business presence physically in Canada; does business in Canada and has assets in Canada. It has at least \$20 million in assets for at least one of its two most recent financial years, has generated at least \$40 million in revenue for at least one of its two most recent financial years, and employs an average of at least 250 employees for at least one of its two most recent financial years.
- Operations:

A construction specialty supply distribution company focusing on building materials, safety products, fasteners, tools and power tools.

- **Supply Chain:**

Distribute over 95,000 skus to 65+ locations across Canada

Original source of products include Canada, United States, South America, Europe and Asia.

6. *Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

- **Yes**
- No

6.1 *If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

- **Embedding responsible business conduct into policies and management systems**
- **Identifying and assessing adverse impacts in operations, supply chains and business relationships**
- Ceasing, preventing or mitigating adverse impacts
- **Tracking implementation and results**
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate

7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500 character limit).

- **At White Cap we are committed to adhering to all of Canada's laws and regulations, including the Fighting Against Forced Labour and Child Labour in Supply Chains Act. White Cap has no child labour or forced labour in its operations, nor have we identified the use of child labour or forced labour in our supply chain. Should child labour or forced labour be identified, we would take prompt remedial action to address the concern.**
- **White Cap Supply Holdings LLC *Supplier Buyer Agreements "SBA" Terms and Conditions*, Clause 5.4(f): "Neither Supplier's manufacturing plants nor any subcontracted plants use government assigned labor or forced labor or workers who are under minimum working age requirements, and in no event under the age of 14".**
- **Test-Rite is our third party representative and are involved in everything from initial conversations and onboarding with potential vendors, product testing to P.O/Order management. The corporate social responsibility portion is covered in the onboarding of a vendor. Test-Rite does the audit and provides the report and it is then at our discretion what to accept or not. "Yes" Responses on the Audit are flagged for the following questions:**
 - **"Is there any child labor or history child labor in factory?"**
 - **"Is there any forced labor/prison labor in factory?"**
 - **"Whether factory does not employ juvenile workers(16-18 years old). Juvenile workers shall be registered in local labor bureau and have a physical examination before working. The**

juvenile workers are not allowed to engage in the dangerous work or harmful to health or work in night shift

8. *Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)

- Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.
- **Yes, we have started the process of identifying risks, but there are still gaps in our assessments.**
- No, we have not started the process of identifying risks.

8.1 *If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Required)

- **The sector or industry it operates in**
- **The types of products it produces, purchases or distributes**
- **The locations of its activities, operations or factories**
- **The types of products it sources**
- The raw materials or commodities used in its supply chains
- **Tier one (direct) suppliers**
- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour
- **The use of forced labour**
- **The use of child labour**
- None of the above
- Other, please specify

9. *Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Required)

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- **Manufacturing**
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services

- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- None of the above
- Other, please specify

~~10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit).-na~~

11. *Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)

- Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.
- Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

~~11.1 *If yes, which remediation measures has the entity taken? Select all that apply. (Required)-na~~

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).

White Cap is not aware of any incidents of forced labour or child labour in our activities or supply chain in our past financial year, subject to the limitations of our risk identification activities. Accordingly, White Cap has not had to take any remedial measures in response to incidents of forced labour or child labour.

13. *Has the entity 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? (Required)

- Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.
- Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

~~14. Please provide additional information on any measures the entity 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 and supply chains (if applicable) (1,500 character limit). --na~~

15. *Does the entity currently provide training to employees on forced labour and/or child labour? (Required)

- Yes
- **No**

~~15.1 *If yes, is the training mandatory? (Required) --na~~

~~16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit). --na~~

17. *Does the entity 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? (Required)

- Yes
- **No**

~~17.1 *If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Required) --na~~

18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).

- **White Cap has not taken any actions to assess the effectiveness in preventing and reducing risks of forced and child labour in its activities and supply chains in the previous financial year. We are currently examining how best to conduct these assessments.**

~~Reporting for Government institutions --na~~

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 listed above.

Name: Vasken Altounian
Title: President – Business Unit
Date: May 31, 2024



Signature*

*I have the authority to bind 'White Cap Supply Canada Inc.'