



## **Bruce's Four Seasons (1984) LTD.**

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Forced Labour and Child Labour in Supply Chains Company  
Assessment

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# Introduction

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This report is Bruce's Four Seasons (1984) Ltd's response to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act), sections 11(1) and 11(3).

This report will be for fiscal year ending September 30<sup>th</sup>, 2024. Bruce's Four Seasons (1984) Ltd. business number is 100671338.

Bruce's Four Seasons satisfies the definition of an Entity within the Act by having a place of business in Canada, doing business in Canada, having assets in Canada and meeting two of the three size-related thresholds.

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# Structure, Activities & Supply Chain

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## **Structure**

Bruce's Four Seasons (1984) Ltd. ("Four Seasons Sales") is a corporation that operates as Four Seasons Sales with 2 locations in Virden and Headingley, Manitoba, one location in Regina, Saskatchewan and one location in Medicine Hat, Alberta. Four Seasons Sales head office is located at 350 Frontage Road West in Virden, Manitoba where the owners are actively part of the employee group. We employ 116 staff in Virden, 47 staff in Haedingley, 35 staff in Regina and 37 staff in Medicine Hat.

## **Activities**

Four Seasons Sales is an RV retailer selling RVs, RV parts and services. Four Seasons Sales sells travel trailers and fifth wheels. We sell RV parts in electrical, plumbing, furniture, and appliances. Four Seasons Sales offers RV models from USA manufacturers including Grand Design, Jayco, Keystone RV, Brinkley, KZ, Forest River, Alliance, Coachman, Palamino, and Highland Ridge RV.

## **Supply Chain**

Four Seasons Sales purchases RVs and RV parts that are imported from the USA. When a new dealer is introduced a Dealer agreement is signed at the time of onboarding. Dealer agreements are reviewed and signed annually. Four Seasons Sales purchases 100% of their RVs from the USA. 50% of RV parts are purchased from the United States and the other 50% of RV parts are purchased from Canada.

# Policies & Due Diligence Processes

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Four Seasons Sales has the following policies and due diligence procedures in place to mitigate the risk of child labour and forced labour within internal activities and their supply chain.

## **Internal Policies**

### Employee Handbook

Four Seasons Sales introduces the Employee Handbook during the onboarding process and the handbook is reviewed annually by management and the employee. All management reviews the rights and responsibilities with the new hire. Four Seasons Sales encourages all staff to openly discuss with their supervisor any problems or concerns so appropriate action may be taken.

### Workplace Safety and Health

Four Seasons provides a comprehensive workers' compensation insurance program to our employees at no cost to the employee. The workers' compensation program covers injuries or illnesses that might happen to the employees that require medical, surgical, or hospital treatment. Four Seasons Sales is committed to ensuring the safety and health of all our employees, customers, and visitors whether during normal work activities at the worksite, or while representing Four Seasons Sales outside of their normal worksite.

To support this commitment, a Workplace Safety and Health Committee has been established to ensure adherence to the Workplace Safety and Health (WSH) policies and procedures and to involve all workers in safety and health activities. The safety orientation and training courses take place when a new hire starts with Four Seasons Sales or an employee is transferred within Four Seasons Sales to a different job. An orientation and on line training covers any topic relevant to safety and health of the worker, including emergency procedures, first aid facilities, any restricted areas, precautions required to protect workers from hazards, and any other safety and health procedures, plans, policies, and programs applying to the worker. All staff at Four Seasons Sales are required to follow safe work procedures, regardless of job held. These procedures have been developed to ensure the safe operation of equipment, safe use of tools, and the maintenance of safe working conditions at all times. All work-related injuries and illnesses, regardless of their extent or nature, and any unsafe working condition or practice must be reported immediately to management, and if necessary, call for medical attention. Employees may report any concerns or complaints respecting the safety or health of workers without fear of retaliation to their supervisor or a member of the Workplace Safety and Health committee. All new staff receives a copy of the Employee Handbook, acknowledge obligation to read and understand its contents

with their signature. A performance review is done annually with all employees.

### **Due Diligence Processes**

Four Seasons Sales requires new hires between ages of 13 and 15 to complete the Young Workers Readiness course. The program is meant to raise awareness of those between 13 and 15 about employment standards for this age bracket. Specifically:

- You cannot work after 10 p.m. the night before a school day;
- You cannot work before classes begin on a school day;
- You cannot work more than 16 hours in a school week;
- You cannot be at heights more than 1.5 meters;
- You cannot be on scaffolds or swing stages;
- You cannot be pruning, repairing, maintaining, or removing trees and shrubs; and
- You cannot work with herbicides or pesticides

Once completed and before their first day of work they present their certificate of completion. All young workers are scheduled between 8:00am and 5:00pm with required breaks within their scheduled shift.

Four Seasons Sales follows Manitoba Employment Standards.

# Supply Chain Risk Assessment

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A second risk assessment over the Entity's industry of operation, goods procured and countries goods are procured from has been performed over material direct suppliers. For the purposes of this report, material suppliers are those who account for at least 5% or more of the Entity's total procurement spend during the 2024 fiscal year.

This risk assessment used two separate indices to conclude on inherent risk of child and/or forced labour related to goods and countries - Walk Free's Global Slavery Index and the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour.

## Industry of Operation:

Four Seasons Sales operates within the industry of recreational vehicles and related parts. Recreational vehicles are not associated globally with an inherent risk of child labour or forced labour according to the two indices. Goods procured by Four Seasons Sales within the category of related parts have been linked to an inherent risk of child labour or forced labour therefore, the Entity has concluded that this industry has an inherent risk exposure.

## Goods Procured:

Four Seasons Sales sells products among the categories of RVs, travel trailers, fifth wheels and RV parts and services. Using the two indices, an inherent risk of forced/child labour has been identified among the category of parts and services, specific to the goods below:

- Carpets
- Furniture
- Textiles
- Electronics
- Glass
- Rubber

## Countries Goods are Procured From:

For the purposes of this assessment, a review of the countries where goods are procured from focused on the location of the Entity's direct supplier's operations. Each direct material supplier is located within Canada and the United States which based on the two indices, have a lower risk of child labour and forced labour. This does not mean that no evidence of forced labour or child labour was found to support this risk analysis but that there is a low inherent risk and continued due diligence is required.

## Remediation of Forced & Child Labour

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To mitigate the risk of child labour and forced labour within supply chains, the entity is considering incorporating mechanisms for supplier due diligence. Our future goal is to create a supplier questionnaire for our larger suppliers to complete. The questionnaire would include questions to mitigate the risk of forced/child labour and, include the expectation of transparency in the relationship with our suppliers. Four Seasons Sales understands the value of discussing these risks with employees and suppliers. These conversations will continue to bring awareness to this issue in an effort to remediate the risk within our supply chains.

## Remediation of Vulnerable Family Income Loss

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Four Seasons Sales is in the process of understanding and evaluating its supply chain related to the risk of child labour and forced labour. To date, Four Seasons Sales has not identified instances of the use of child labour or forced labour within our operations or those of suppliers. Four Seasons Sales is continuing its review of procurement practices to enhance the rigor of its due diligence processes including raising awareness with its suppliers.

## Awareness Training

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All Employees are trained during the onboarding process. Policies are acknowledged with a signature at the time of onboarding. All employees have an annual performance review where the policies are reviewed with the employee. Four Seasons Sales recognizes the opportunity to enhance employee training relevant to this Act, therefore, will be evaluating applicable training for staff in the foreseeable future. Our goal is to develop awareness-raising guidance materials as part of training.

## Assessing Effectiveness

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To track Four Seasons Sales effectiveness of procedures to mitigate the risk of child labour and forced labour, the following mechanisms are in place:

**Health and Safety Policies:** Four Seasons Sales has policies and training in place that covers any topic relevant to safety and health of the worker. These policies are communicated and completed at the time of hiring and throughout their employment with their appointed manager. Annual policy review and checkpoints can be an opportunity to ensure the risk of forced or child labour within activities are being adequately addressed. Four Seasons Sales complies with MB Employment Standards.

**Employee code of conduct acknowledgement:** Four Seasons Sales requires employees to discuss and sign off on the Employee Code of Conduct upon onboarding, which includes awareness of the rights of others. This sign-off reflects the employees understanding and adherence to this policy.

**Health & Safety and Harassment incident reporting:** Four Seasons Sales requires all workplace incidents regarding employee violence, harassment, health and safety, to be reported to management. For each instance, a Workplace Violence and Harassment Policy and Prevention plan is developed to resolve the incident in a timely manner.

# Steps Taken to Prevent & Reduce Risk of Child Labour or Forced Labour

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The Entity has taken the following steps to prevent and reduce the risk of child labour or forced labour within their activities and supply chain:

1. **Mapping activities:** As part of this report, Four Seasons Sales has mapped their activities to complete a risk assessment to align with the Act.
2. **Mapping supply chains:** As part of this report, the Four Seasons Sales has mapped their supply chains to complete a risk assessment to align with the Act.
3. **Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains:** As part of this report, Four Seasons Sales has performed a risk assessment of its activities and supply chains, and has concluded that a low inherent risk of child labour and/or forced labour exists.
4. **Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily:** If we hire a person 13, 14 or 15 years of age we require them to complete the Young Worker Readiness Certificate Course with a parent or guardian's signature at completion. The Young Worker Readiness Certificate Course (YWRCC) is part of Safe Work Manitoba and will teach the young workers the basics about workers' and employers' rights and responsibilities for safety, health and the employment relationship. It contains important information they need to know before entering the job market. All new hires review rights and responsibilities with management, acknowledge with a signature, our policies and procedures within our Employee Handbook.

# 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 Bruce's Four Seasons (1984) Ltd. 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."

<u>Troy Mollard</u>	<u>T Mollard</u>
Full Name	Signature
<u>Manager</u>	<u>May 15, 2025</u>
Title	Date

I have the authority to bind 'Bruce's Four Seasons (1984) Ltd.