

BILL S-211 REPORT

Gerrie Electric Wholesale Limited is an Electrical, Automation and Lighting solution distributor in Canada. Gerrie Electric supports Residential, Commercial, and Industrial markets / projects with lighting, wire and cable, automation, and connected network solutions.

Gerrie Electric is a Family-Owned Business since 1957, serving customers at 24 locations in Ontario, Canada with over 400 Team Members with annual sales in excess of \$200 million. Our Fiscal Year is between April 1st 2024 – March 31st 2025. Our Head Office is in Ontario, and we are not subject to reporting requirements under supply chain legislation in another jurisdiction.

Gerrie Electric partners with reputable suppliers in the electrical industry in the capacity of sales & distribution of electrical products. We have established strategic partnerships with our preferred suppliers, all approved by the executive management. We procure our products directly from the manufacturers or using a third-party agent depending on the suppliers' business model and requirements.

Gerrie Electric complies with the Canadian Human Rights code as it applies to services/products we offer to the Canadian market. This includes sourcing the products/services from the suppliers and using the supply chain located in Canada or outside Canada.

Gerrie Electric implemented controls and procedures to identify, investigate and remedy the risk of any child and forced labour in operations and supply chains.


We have implemented a Company Policy under Code of Conduct and Business Ethics (please see Policy 1.24 attached-EX1) clearly stating that:

- This policy guides our actions and ensures that we continue to live up to our reputation as an ethical organization, that abides by the Human Rights Code and applicable Employment Standards Legislation pertaining to child labour laws, hiring practices, wages, hours worked, overtime and working conditions.
- Forced Labour : Employment should be freely chosen. No form of forced or involuntary labour is allowed.

*HEAD OFFICE 4104 South Service Road, Burlington, Ontario L7L 4X5 TEL: 905-681-3656 FAX: 905-681-1774

GERRIE LOCATIONS ALLISTON/705-434-9229 BOLTON/905-857-9288 *BRANTFORD/519-754-1166 *BURLINGTON/905-681-3660
*CAMBRIDGE/519-740-2912 *CONCORD/416-213-7111 GEORGETOWN/905-877-2264 *GUELPH/519-823-8442 *HAMILTON/905-548-0388
HAMILTON MOUNTAIN/905-548-0388 HYDE PARK/519-641-4321 *KITCHENER/519-893-1932 LONDON/519-659-1234 MILTON/905-878-8406
*MISSISSAUGA/905-625-3118 *OAKVILLE/905-845-2891 SIMCOE/519-428-2884 *ST CATHARINES/905-688-4212
ST THOMAS/519-633-1400 STRATFORD/519-273-6767 WATERLOO/519-886-0367 *WELLAND/905-732-4473 WOODSTOCK/519-539-4789
AUTOMATION GROUP BURLINGTON/905-681-3668 www.gerrie.com GERRIE LIGHTING STUDIO OAKVILLE/905-845-2461

*Management System Registered to ISO 9001

 **GERRIE is a 100% Canadian owned company**



- Exploitation of child labour is not acceptable. Minimum age requirements must be followed as outlined in legislation.
- Discrimination is not permitted on the basis of gender, age, religion, race, social background, disability, ethnic or national origin, nationality, political affiliation and sexual orientation.

Responsibility of the implementation of the policy lies with the Executive, Director of Human Resources, the Branch and Department Managers and any staff who are made aware of a potential situation. Any infringement must be reported immediately to the Director of HR.

Furthermore, Gerrie Electric included a special clause to the Purchase Order (PO) Cover Sheet that are being sent to the supply chain partners (please see PO Cover Sheet attached EX2). There are no transactions that are carried out without a PO Cover sheet, and we decline partnering with any supply chain who does not comply with Labour Laws.


To effectively address the issue of Forced Labour and Child Labour internally and in supplier partnerships, Gerrie Electric has developed a multi-faceted approach that encompasses the following key elements that are currently in place:

- Clearly communicate a zero-tolerance policy for forced labour and child labour to the suppliers. Make it known that non-compliance will result in termination of the business relationship and potential legal action.
- Gerrie Electric Policies are part of the New Employee Onboarding Process and are available to every employee in the organization. All Gerrie Electric employees are required to adhere these policies and to all Canadian and Ontario Laws.
- Gerrie Electric has an approved supplier listing and only deals with reputable suppliers/supply chain and never discovered any incidents or risks to date. Furthermore, 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.

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Part of
 the
 group

Gerrie Electric is in the process to identify parts of its activities and supply chains that may prevent a risk of forced labour or child labour being used. We contacted our suppliers and requested information on Labor Practices in Compliance with the Fighting Against Forced Labor and Child Labor in Supply Chains Act. The identical process will be carried out in our following Fiscal Year, 2025-2026.

- Conduct thorough assessments of potential and existing suppliers to evaluate their labour practices and identify any instances of forced labour or child labour. This process may involve connecting with our suppliers and sending them an assessment questionnaire annually and the implementation of transparent reporting mechanism.
- Work collaboratively with suppliers to raise awareness about the importance of ethical labour practices and provide support to help them comply with Bill S-211 (the Act) standards.
- Collaborate with industry peers, civil society organizations, and government agencies, NGOs (Electro Federation Canada, Affiliated Distributors, Public Safety Canada etc.) to share best practices, advocate for stronger regulations, and support initiatives aimed at eradicating forced labour and child labour in the electrical industry.
- Implement robust monitoring and evaluation mechanisms to track progress, identify risks, and address any violations promptly. Regularly review and update policies and practices to reflect evolving standards and best practices in ethical sourcing.


Gerrie Electric will participate in webinars that will be documented in 2026 reporting, will participate in training and knowledge of the Act, and will be part of Affiliated Distributors' (AD) vendor reporting/affirmations where the supplier/partners will be asked to document what they have done to prevent and reduce the risk that forced labour or child labour will be used at any step of the production of goods in Canada or elsewhere by the entity or of goods.

This will be part of the 2026 supplier program discussions, and the information will be posted on AD's website, with a corresponding landing page. Gerrie Electric is an active member of Affiliated Distributors (AD), North America's largest marketing/buying group for electrical, industrial, and construction supplies, that brings together independent distributors and best-in-class supplier partners.

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By implementing a comprehensive process that encompasses due diligence, engagement, traceability, policy enforcement, collaboration, and monitoring, Gerrie Electric can mitigate the risk of exploitation in our supply chains and contribute to a more just and sustainable Canadian Economy. Only through collective action and unwavering commitment can Gerrie Electric ensure that every worker is treated with dignity and respect.

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 Gerrie Electric Wholesale Limited. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all materials aspects for the purposes of the Act, for the reporting year listed above.

Scott Currier
Chief Financial Officer
May 23, 2025

I have the authority to bind Gerrie Electric Wholesale Limited


SIGNATURE :



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GERRIE ELECTRIC WHOLESALE LIMITED
COMPANY POLICIES

REV DATE: October 23, 2018

SUBJECT: Code of Conduct and Business Ethics

DESCRIPTION: This policy guides our actions and ensures that we continue to live up to our reputation as an ethical organization, that abides by the Human Rights Code and applicable Employment Standards Legislation pertaining to child labour laws, hiring practices, wages, hours worked, overtime and working conditions.

POLICY 1:

Intent

Gerrie Electric Wholesale Ltd. is committed to fostering an environment that promotes efficiency and professional success for employees. The achievement of such success is dependent on an environment free of behaviours which can undermine the important attributes that are the core of our company. An atmosphere of mutual respect, fairness and trust is essential. Gerrie is committed to establishing and implementing a standard of excellence in every respect of our business, while promoting and ensuring the rights of all individuals, the company and the environment.

We expect the same commitments to be shared by all Gerrie Employees, as well as our vendors and customers.

Gerrie Values and Compliance with Laws and Regulations

Gerrie Electric will foster our value system and also comply with all applicable laws and regulations, including local and provincial codes, rules and regulations and industry standards. It is imperative that we are all committed to:

- Comply with the spirit, as well as the letter, of the applicable laws and regulations
- Act with honesty, integrity and transparency at all times
- Conduct all our business relationships in an ethical and lawful manner
- Recognize the dignity and worth of every person and to provide equal rights
- Comply with the Human Rights code as it applies to services/products we offer to the public. This includes dealing with customers, potential customers, business associates and suppliers.

GERRIE ELECTRIC WHOLESALE LIMITED
COMPANY POLICIES

References

References for previous employees must be directed to, and can only be completed by a member of the Executive Team or Director of Human Resources.

No referrals will be given by any employee on behalf of our customers or suppliers without the approval of the Executive.

Conditions of Employment and Business Partner Expectations (including Customer and Suppliers):

Management Practice

It is required that fundamental worker protections are provided as outlined in applicable legislation and to incorporated within internal policies.

Compensation

Employees should be compensated with wages and benefits which are in compliance with the provincial and federal regulations.

Working Hours

All applicable legislation must be followed pertaining to the number of hours and days worked by all employees working (including products or services supplied to Gerrie).

Forced Labour

Employment should be freely chosen. No form of forced or involuntary labour is allowed.

Child Labour

Exploitation of child labour is not acceptable. Minimum age requirements must be followed as outlined in legislation.

Discrimination/Human Rights

Discrimination should not be permitted on the basis of gender, age, religion, race, social background, disability, ethnic or national origin, nationality, political affiliation and sexual orientation.

GERRIE ELECTRIC WHOLESALE LIMITED
COMPANY POLICIES

Discipline

Workers should be treated with respect and dignity. Disciplinary measures should comply with legislation. No employee raising a complaint, based on applicable laws, should be subject to disciplinary action or reprisal.

Association

Legislation regarding workers' rights and organizations is to be followed.

Safety and Health

Workers are entitled to work in safe environment. All applicable local standards, legislation and regulations are to be complied with in relation to working conditions and occupational health and safety.

Environmental Practices

All applicable legislation in relation to the protection of the environment is to be complied with as is the promotion of greater environmental responsibility.

Verification/Review

Gerrie reserves the right, as a condition of acceptance or continuation of approval, to conduct verification and /or review of business partner policies, programs, business practices and facilities to verify compliance with this policy.

Implementation

Responsibility for the implementation of the policy lies with the Executive, Director of Human Resources, the Branch and Department Managers and any staff who are made aware of a potential situation. Any infringement must be reported immediately to the Director of HR.

GERRIE ELECTRIC WHOLESALE LIMITED
COMPANY POLICIES

Policy 1.24 Code of Conduct and Business Ethics

I _____ acknowledge that I have read and understand the Code of Conduct and Business Ethics Policy. I agree to adhere to this policy and if I have employees working under my direction, I will ensure they adhere to this policy. I understand that if I violate the rules of this policy, I may face legal, disciplinary, or corrective action, up to and including termination of employment, and/or criminal prosecution.

Name: _____

Signature: _____

Date: _____

**GERRIE ELECTRIC WHOLESALE LIMITED
COVER SHEET**

TO:

ATTENTION:

DATE:

PAGE: 1 of

FROM:

PHONE: (519)893-1932

CONTACT:

FAX: (519) 893-4462

EMAIL ADDRESS:

**PLEASE CONFIRM THE ATTACHED ORDER
OUR ORDER REFERENCE**

Please note that if there are any discrepancies between our purchase order or confirmation and your order, you must notify the buyer upon receipt of the order in regards to pricing, delivery and freight charges applicable via Fax or Email.

If we are not notified immediately of pricing discrepancies, we will issue payment for the amount shown on the purchase order or confirmation.

If we are not notified of freight charge discrepancies, we will debit the amount with our payment.

If we are not notified of substitutions or part number changes prior to shipment we will refuse the shipment.

NOTE 1: ALL PIPE, STRUT AND CABLETRAY MUST BE DELIVERED ON A FLATBED TRAILER

NOTE 2: FOR PUROLATOR AND LOOMIS COLLECT SHIPMENTS, PLEASE SHOW A MINIMUM DECLARED VALUE OF \$250.00 ON WAYBILL

PLEASE SIGN THIS COVER SHEET AND RETURN, BY FAX OR EMAIL, ALONG WITH ANY APPLICABLE AMENDMENTS. YOUR COOPERATION IS APPRECIATED.

CONFIRMED BY: _____ DATE: _____

COMPANY: _____ YOUR ORDER# _____

EXPECTED DELIVERY DATE ON ALL ITEMS: _____

Gerrie Electric
 4104 South Service Road
 Burlington
 L7L 4X5

PO No.	
PO Type	
Date	
Branch	
Page No.	

Qty Ordered	U M	Item Number/ UPC	Description/ Supplier Item	Unit Price	PU UM	Extended Price	Request Date	Line
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G.S.T. Number 10200 7937 RT0001

Tax Group Summary:

Term:

Purchasing Agent: _____

Sub Total:
 Sales Tax:
 Total Order:

We do not purchase products without CSA, cUL or cETL approval. Do not quote or accept any order from us for product that does not have this certification. If we have put one of these products on our PO and you ship it to us, we will return it collect and issue any charges by the customer for any inspection or labor for return of these.

Any infringement on human rights, but namely those of children, is of considerable concern to Gerrie. Our purchasing Department is to be notified immediately of any practices to the contrary by your company. Our supply base is encouraged to promote the purchase of goods and services from companies that operate in full compliance with the laws of their respective countries in respect to all applicable child labour laws, rules and regulations related to hiring, wages, hours worked, overtime and working conditions.