



bartle & gibson
Plumbing | Heating | Electrical



FORCED LABOUR IN CANADIAN SUPPLY CHAINS

Feb 1. 2025 to Jan 31. 2026

FORCED LABOUR IN CANADIAN SUPPLY CHAINS STATEMENT

Bartle & Gibson Co. Ltd. (The “Company” or “Bartle & Gibson”) has created this report in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act” or “Forced Labour Act”), which came into force in January 2024. The company’s Board of Directors has reviewed and approved this report. This report meets the reporting requirements set out by the Government of Canada and covers the reporting period from February 1st, 2025, to January 31st, 2026.

STRUCTURE/ACTIVITIES/SUPPLY CHAIN OVERVIEW

Bartle & Gibson is a privately held Canadian-owned limited liability corporation established in 1944. The Company is a wholesale distributor of Plumbing, Heating and Electrical products in Western Canada. The Company is headquartered in Edmonton, Alberta and has branches in Alberta, British Columbia, Saskatchewan and the Northwest Territories. As of January 31st, 2025, the company had 609 employees, all based in Canada.

Bartle & Gibson employs a classic functional structure with territory/regional managers, branch managers, department managers, divisional managers, and executives who all answer to the President/CEO. The company has a board of directors that acts in a fiduciary capacity for the shareholders.

The company’s mission is “Supplying the right solutions at the right time with our expert customer care throughout Western Canada.” It is a member of various associations, including the Canadian Institute of Plumbing & Heating (CIPH), Electro Federation Canada (EFC), Affiliated Distributors Buying Group (AD), the Canadian Homebuilders Association (CHBA), and the Mechanical Contractors Association (MCA).

Bartle & Gibson’s supply chain includes businesses that supply goods and services to our organization. Bartle & Gibson does business with approximately 700 suppliers located primarily in Canada and the United States. The suppliers we engage include those with a global presence and those that provide local goods and services. The following are the general categories for products and services:

- Global Manufacturers – Leading brands that have a global presence.
- Master Distributors - Specialized organizations that combine manufacturing and sourcing to supply goods to the wholesale channel.
- Local suppliers – These suppliers may not sell globally but may buy globally.
- Services/Subcontractors – Locally sourced services for cleaning, maintenance, IT services, and other services. These services would broadly be local but may have a remote component for IT support.

Internal use products include cleaning supplies, IT infrastructure, and marketing. Sourced from local suppliers that may, in turn, bring in products from various sources.

POLICIES/DUE DILIGENCE MEASURES

Bartle & Gibson expects third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations.

In order to mitigate the risk of forced and child labour, Bartle & Gibson is committed, on an ongoing basis, to:

- Embedding responsible business conduct into our policies and management systems.
- Providing training for staff with purchasing authority regarding forced and child labour.
- Having discussions at all levels of the organization regarding forced and child labour.
- Having forced and child labour policies a part of the supplier onboarding process.
- Staying educated as the Government of Canada provides guidance on best practices.
- Engaging in dialogue with industry groups about forced labour and child labour.

For the previous year, Bartle & Gibson continued efforts to assess its supplier base for compliance with Bill S-211. This was done by either acquiring a copy of the supplier’s Bill S-211 declaration or having them complete a risk assessment. The risk profile of suppliers is assessed using factors including the location of goods being sourced, their country of origin, and the existence of policies and procedures aimed at preventing and reducing forced labour and child labour by suppliers.

The Supplier Code of Conduct is now a statement that is included in the onboarding process. By doing business with Bartle & Gibson, the

supplier agrees to the standards outlined for key areas. These include forced and child Labour, employment standards, occupational health and safety standards, environmental laws, and conflicts of interest. For one-off suppliers, the company has clear purchase order terms and conditions referenced on the purchase order and posted publicly on the website.

The company continued to ensure that all staff members with purchasing authority complied with the Bill S-211 awareness training.

Bartle & Gibson is committed to reviewing our policies and procedures as required and at least annually.

Forced and child labour risk is intended to be a regular topic for the Bartle & Gibson Board of Directors to ensure the company is fulfilling its responsibilities.

RISK ASSESSMENT/MITIGATION PROCESS

On an ongoing basis, Bartle & Gibson is committed to engaging in various activities to identify, assess, and manage supplier risk. In assessing the risk of forced labour and child labour in our business and supply chains, we plan to apply our external supplier risk assessment, among other tools. To identify the business activities with the greatest exposure to these risks, we consider the following factors:

- Dangerous or undesirable work.
- Reliance on a low-skilled workforce.
- Jurisdictional risks, including poverty, conflict, and low levels of human rights standards.
- Offshore production
- Others, as applicable.

During the reporting year, we continued our risk assessment of our suppliers to gain better visibility into our supply chains, which included an assessment of the following:

1. Whether the supplier had a Bill S-211 report submission on file with the Government of Canada.
2. Policies against forced labour and child labour by the supplier and any sub-suppliers further down the supply chain.
3. Percentage of goods imported and their origin.
4. An assessment of whether high-risk goods from specific countries are part of Bartle & Gibson's supply chain.

This risk assessment is intended to provide Bartle & Gibson with risk classifications for each supplier, ranging from low to moderate to high. Depending upon a supplier's assessed risk level, Bartle & Gibson may undertake particular due diligence or other steps. For example, if a supplier is of moderate risk, Bartle & Gibson may require them to take steps, including implementing a policy to address forced and child labour in their supply chains and those of any sub-suppliers they deal with. If the supplier is classified as a higher risk, Bartle & Gibson may require additional due diligence, such as requiring the company to outline the steps taken to mitigate the risk of forced labour or child labour in the supply chain. This is in addition to a review of the supplier's policies on forced labour and child labour. Suppliers identified as higher risk may also be targeted for future investigation by Bartle & Gibson. Should a supplier refuse to adhere to these policies, Bartle & Gibson may seek to terminate its business relationship or refuse to conduct future business with that supplier. If the supplier has submitted a Bill S -211 report for the previous year, that is taken into consideration.

Based on the current survey responses, 87% of our suppliers are in the lower or moderate risk categories. Suppliers in the higher-risk category have provided due diligence measures and policies to show how they mitigate risk. Most control risk through regular audits, direct factory ownership, and strict policies. Assessment of these risks will continue. At this time, the risk is considered low that there is exposure to forced labour or child labour in the supply chains for the assessed companies.

REMEDIATION STATEMENT

Bartle & Gibson is working to mitigate the risk of forced and child labour in our supply chain. Should forced or child labour be discovered in our business and supply chains, Bartle & Gibson is prepared to take measures that may include suspension or termination of a supplier, sub-supplier, or contractor. To date, Bartle & Gibson has not identified any instances of forced labour or child labour in its business or supply chains and has therefore not carried out any measures to remediate any forced labour or child labour or loss of income to vulnerable families.

EMPLOYEE TRAINING

For the previous year, Bartle & Gibson has continued the awareness training program for all employees who procure goods and services. This training teaches employees about the Forced Labour Act, how the company complies, and the requirements for Bartle & Gibson's suppliers.

EFFECTIVENESS ASSESSMENT

Bartle & Gibson is committed to developing and assessing its policies, procedures and actions to prevent and reduce the risk of forced and child labour in its supply chains.

The collection of this information is expected to enable Bartle & Gibson to gain better visibility into our supply chains. This information may be used to consider additional measures and/or improve our existing measures to prevent and reduce the risk of forced and child labour.

We also assess the effectiveness of our policies by:

- Setting up a regular review of the organization's policies and procedures related to forced and child labour.
- Tracking relevant performance indicators such as levels of employee training and awareness.
- Reviewing compliance from our suppliers to risk assessments, policies and codes of conduct.
- Looking at best practices in our industry to gauge effectiveness.

To date, we have sent our risk assessment survey and supplier code of conduct to over 700 suppliers, and 64% of suppliers have responded, representing over 93% of our yearly spend. We have targeted the higher volume suppliers first and continue to follow up.

At this time, 100% of staff responsible for procuring goods and services have completed the internal Bill S-211 awareness training.

ONGOING PROCESS

Our commitment to this process is continuous, and we intend to continue implementing and refining the actions listed in the previous sections. As more information becomes available regarding compliance with Bill S-211, Bartle & Gibson will become educated and implement any relevant best practices.

PRESIDENT'S DECLARATION

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.



Martin Lower
President/CEO
Date May 4, 2026

I have the authority to bind Bartle & Gibson Co. Ltd.