



Bartle & Gibson Co. Ltd.  
Forced Labour in Canadian  
Supply Chains

---

**REPORT**

Feb 1. 2023 to Jan 31. 2024

## MESSAGE FROM THE PRESIDENT

Bartle & Gibson is committed to being a responsible corporate citizen and adhering to all requirements set forth by the Canadian Government. As a company, we are striving to identify and prevent the use of forced or child labour in our operations and supply chains. This report covers the steps taken by Bartle & Gibson to mitigate such risks within its own operations and supply chains to ensure compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

This is the first year of reporting for Bartle & Gibson, and we are happy to talk about our initial steps to prevent and reduce risk in our operations and supply chain. As we move forward, we hope to improve this process continuously.

Some key items we will be focused on:

- Continuing to review all of our suppliers for risks of forced labour and child labour.
- Expanding forced labour and child labour educational training programs as they become available.
- Ensuring discussions of forced labour and child labour continue at all levels of the organization.

A key value for Bartle & Gibson is that of caring:

Looking after our employees and customers the way we would want to be looked after.

Although this value statement is aimed at our employees and customers, we extend this to all of our business dealings. As a 100% Canadian-owned company, we proudly uphold the values that make Canada a great place to work and live.

Sincerely,



Martin Lower  
President/CEO  
Bartle & Gibson Co. Ltd.

## 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, 2023, to January 31st, 2024.

### 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, 2024, Bartle & Gibson had 516 employees, all based in Canada.

Bartle & Gibson employs a classic functional structure with branch managers, department managers, regional 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 600 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 sell primarily to local

markets 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** - These 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 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.

In 2023, Bartle & Gibson began reviewing its policies and procedures for purchasing goods and services. This review determined the need for a Supplier Code of Conduct for suppliers from whom Bartle & Gibson purchases products. The Supplier Code of Conduct asks suppliers to state their compliance with consistent standards outlined by Bartle & Gibson. This includes forced and child labour, employment standards, occupational health and safety standards, environmental laws, and conflicts of interest. The Company also amended its standard purchase order terms and conditions to include relevant terms addressing forced and child labour.

The Company also began a full review of its supply chain and requested all suppliers complete an external risk-based assessment survey to identify forced and child labour risks. The risk profile of suppliers will be assessed using factors that include 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 Company is developing training for all users involved in

procuring goods and services to ensure they are aware of the Forced Labour Act and the processes and procedures applicable to any new suppliers.

Bartle & Gibson is committed to reviewing its 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 began a risk assessment of our suppliers to gain better visibility into our supply chains, which included an assessment of the following:

1. Policies against forced labour and child labour by the supplier and any sub-suppliers further down the supply chain.
2. Percentage of goods imported and their origin.
3. 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 lower, moderate, or higher. 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 that they take steps, including having a policy to address forced and child labour in supply chains and any sub-suppliers they deal with. If the supplier is classified as higher risk, Bartle & Gibson may require additional due diligence, such as requiring the company to list the steps taken to mitigate the chance of forced labour or child labour in the supply chain. This is in addition to a review of forced labour and child labour policies from that supplier.

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.

Based on the current survey responses, 89% 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 makes diligent efforts to ensure that the risk of forced and child labour is mitigated in our business. 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**

Bartle & Gibson has started an 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. It is intended for all employees who procure goods and services to take this training once a year. The company plans to expand this training as external programs become available. It aims to continuously improve its training programs to reflect the Forced Labour Act's requirements and/or any additional future requirements.

## **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 approximately 600 suppliers, and 23% of suppliers have responded to date, representing over 40% of our yearly spend. We have also completed an update to our purchase order terms and conditions and integrated forced labour awareness into our board meeting agenda. The internal training program has also been launched, and 80% have completed it to date.

### **Ongoing Process**

Our commitment to this process is continuous, and we intend to continue implementing and refining the actions listed in the previous sections. The key area of focus will be continuing a review of all suppliers we deal with within our due diligence framework. We also intend to look into best practices and refinements that we can implement into our due diligence processes on an ongoing basis.

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  
April 29, 2024

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



**bartle & gibson**  
Plumbing | Heating | Electrical