



# Fighting Against Forced Labour and Child Labour in Supply Chains Act – Parliament of Canada

Employer Statement

Report period ending 1<sup>st</sup> May 2024



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Note: This statement excludes any entity that elects to report independently

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## Employer Statement

The Bolt Supply House Ltd (BOLT) is resolutely committed to combatting Forced Labour and Child Labour in Supply Chains (Modern Slavery) in all its forms. We believe that the eradication of these egregious violations of human rights necessitates a collaborative approach, drawing upon the dedication and resources of governments, international organizations, the private sector, and civil society.

As a responsible corporate entity, BOLT acknowledges the unique role that businesses play in this global endeavor. We understand that our operations can impact the general public, and we are fully committed to expanding our efforts to identify, address, and prevent instances of child labor and forced labor within our supply chains and broader business activities.

This commitment extends beyond mere compliance with regulations; it is a moral imperative that guides our actions and decision-making processes. We recognize that the fight against modern slavery requires ongoing vigilance, continuous improvement, and a willingness to innovate.

At BOLT, we are dedicated to implementing policies, conducting risk assessments, and engaging with stakeholders to ensure transparency and accountability in our efforts to combat modern slavery. Furthermore, we are committed to providing support and resources to empower those affected by these injustices and to contribute to broader systemic change.

In collaboration with our partners and stakeholders, BOLT will continue to advocate for stronger regulations, promote ethical sourcing practices, and raise awareness about the devastating impact of modern slavery. Together, we can build a future where every individual is treated with dignity, respect, and fairness, free from the chains of exploitation and oppression.

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## Our Company Structure

BOLT is dedicated to embodying values of customer-centricity, being an exemplary employer, and fostering a safe workplace environment. Currently, our team is comprised of 200 plus teammates spread across Canada. Serving various customer segments, including consumers, general contractors, enterprises, and shareholders, is at the core of our operations. We primarily operate in Western Canada, with a presence in British Columbia, Alberta, Saskatchewan, and Manitoba.

Our stores are meticulously designed to offer a diverse range of products, both from our own inventory and third-party vendors, spanning numerous categories. Customers can access our offerings through multiple channels, including our websites, and physical store locations. To ensure efficient order fulfillment, we employ various methods, including our main Distribution Center and Delivery Network, co-sourced and outsourced arrangements, digital delivery, and in-store pickups.

Given our extensive operations and supply chains across Western Canada, BOLT is deeply committed to enhancing the working conditions of all individuals associated with our business. We recognize the importance of monitoring for conditions that may expose workers to the risk of modern slavery, reaffirming our dedication to ethical practices and social responsibility.



## Policies & Procedures

Through our policies, we articulate our fundamental values and set forth our expectations, holding ourselves, our suppliers, and our selling partners to a high standard. We make it clear that modern slavery will not be tolerated in any form within our operations. Our commitment extends to a perpetual evolution and improvement of our approach, ensuring that we remain proactive in upholding ethical standards and fostering positive change.

### Minors in the Workplace Policy

The issue of minors in the workplace poses legal, ethical, and social challenges, which our company addresses with a robust policy. We strictly adhere to regulations governing young workers, ensuring their safety, well-being, and educational needs are met. Our commitment extends to providing comprehensive training, supervision, and growth opportunities for minors, fostering a supportive environment free from exploitation. While recognizing the value of early employment, we prioritize the protection and empowerment of young workers, aligning our practices with ethical standards and societal expectations.

### Illegal Labour Policy

Our company maintains a steadfast commitment to preventing illegal labor in the workplace. We strictly prohibit any unlawful practices and ensure compliance with all relevant laws and regulations. Through rigorous vetting, audits, and training, we uphold transparency, accountability, and respect for workers' rights. This commitment underscores our dedication to operating ethically and promoting fair labor practices company-wide.





## Assessing Our Risk

BOLT conducts all contracting and procurement activities in an ethical manner, adhering to our Supply Chain Standard and applicable laws. We mandate suppliers to comply with our standards outlined in the BOLT Code of Business Ethics and Conduct, in addition to their own ethics policies. To provide clarity, we have developed BOLT Supplier Expectations. Since the implementation of the Modern Slavery Act 2024, BOLT has heightened its focus on modern slavery within our Canadian operations and supply chain. Our actions include:

- Continuing regular meetings of our internal modern slavery working group to assess and address modern slavery risks.
- Delivering an annual modern slavery awareness program to all teammates.
- Issuing Supplier Certificates of Compliance to gather information on vendors' efforts to address modern slavery risks.
- Evaluating responses to the vendor questionnaire, with no material risks identified to date.
- Extending due diligence to all suppliers, regardless of spend or relationship size.
- Ensuring that BOLT's standard contract terms incorporate provisions on compliance with human trafficking and modern slavery laws for all newly contracted contractors or suppliers.
- Maintaining an accessible ethics reporting framework and policies to handle issues confidentially and without fear of reprisal.
- Committing to investigate and remediate any reported incidents of potential or actual modern slavery in collaboration with suppliers and stakeholders.
- Identifying future actions for continuous improvement in modern slavery response, embedding risk management in ongoing processes beyond 2024.



## Our Commitments and Progress

We take great pride in our ongoing efforts to uphold and advance human rights within our operations, including measures to detect and address risks associated with modern slavery. Regular evaluations of our progress against established commitments guide our path forward. As our initiatives continue to evolve, we eagerly embrace the opportunity to further engage our entire company in the collective endeavor to mitigate the challenges posed by modern slavery.

Initiative	On-going Progress
Regular review of our governing policies and assessment processes	<b>We implemented two (2) policies:</b> Minors in the Workplace Policy and Illegal Labour Policy to effectively manage and combat Modern Slavery.
Increase awareness on Modern Slavery with new teammates and an annual acknowledgement with existing	<b>We have developed informative material</b> surrounding Modern Day Slavery in our on-boarding orientation program and included in our Employee Handbook annual acknowledgment alongside our Code of Business Conduct.
Ensure our Supplier Certificate of Compliance are issued to all new vendors	<b>We developed a Supplier Certificate of Compliance</b> form issued to all our new vendors that we partner with in our pursuit and development of our responsible commodity sourcing plan.





## Consultation & Approval

The development of this statement involved consultation with internal stakeholders and BOLT management personnel.

It has been approved by BOLT Senior Leadership and will be annually published on the corporate website.



A handwritten signature in black ink, appearing to read "Kurt Mario".

**Kurt Mario**

President

May 2024

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