



Canada Supply Chains Act Statement

2024 Report



Introduction

This report constitutes British Columbia Automobile Association, B.C.A.A. Holdings Ltd. and BCAA Insurance Corporation's (collectively, "BCAA") joint report pursuant to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") for BCAA's 2024 fiscal year of October 1, 2023 to September 30, 2024.

BCAA stands firmly against the use of forced labour and child labour, and we are committed to upholding the highest standards of ethics and integrity in conducting our business. This commitment is reflected in our policies and procedures, which require all BCAA employees to act ethically, in good faith and in accordance with all applicable laws. BCAA is dedicated to working with suppliers who operate with a strong sense of corporate social responsibility and who are aligned with our ethical standards.

Overview of BCAA

BCAA serves 1 in 3 British Columbian households with industry-leading products including home, car, travel and small business insurance, Evo Car Share ("Evo"), Evolve E-Bike Share ("Evolve"), roadside assistance, full auto repair at BCAA's Auto Service Centres across the province, BCAA Auto Marketplace, BCAA Connect, and exclusive partner savings. As a purpose-led organization, BCAA is committed to "Empowering British Columbians to Move Forward" and making life in BC better for everyone.

BCAA is made up of British Columbia Automobile Association, a not-for-profit organization, and its wholly owned subsidiary, B.C.A.A. Holdings Ltd., and B.C.A.A. Holdings Ltd.'s wholly owned subsidiary, BCAA Insurance Corporation.

BCAA does not produce any goods within or outside of Canada and does not engage in a high volume of import activities. In our 2024 fiscal year, BCAA imported goods directly from suppliers based in France, the United States, and China. These imported goods included items necessary for the operation of Evo cars and Evolve e-bikes, such as operating hardware for Evo cars, e-bikes, e-bike spare parts, e-bike batteries, e-bike number plates, and e-bike racks. BCAA's import activities during our 2024 fiscal year were predominantly for the operation of Evo and Evolve, but during the 2024 fiscal year we also imported maps from the United States for distribution to our Members at our Service Locations, as well as miscellaneous parts and tools for our roadside assistance fleet. Given our risk mitigation measures described below and the fact that BCAA's total expenditure on imported goods during our 2024 fiscal year did not constitute a significant portion of BCAA's total expenditures for the fiscal year, we believe that the risk that forced labour and/or child labour occurs in our business or supply chains is low.

BCAA's Policies and Procedures

To mitigate the risk that forced labour and child labour are used in BCAA's supply chain, BCAA has implemented several policies and procedures, including some that are specific to BCAA's assessment, selection, and management of suppliers:

- BCAA's Code of Conduct obligates all BCAA employees to: (i) act ethically and in accordance with the highest levels of personal and professional integrity, (ii) comply with all applicable laws, including the Act, (iii) communicate BCAA's commitment to ensuring its business and supply chains are free of forced labour and child labour to suppliers, and (iv) report violations of the BCAA Code of Conduct, either to the proper authority within BCAA or anonymously to an independent consultant retained by BCAA. Under our Code of Conduct, BCAA also encourages employees to report any suspicion that forced labour or child labour is used in any part of BCAA's business or supply chains. BCAA will not take or allow any reprisal against an employee who, in good faith, reports a suspected violation of BCAA's Code of Conduct.
- BCAA's Supplier Code of Conduct sets forth BCAA's expectations of all suppliers of goods and services to BCAA related to human and civil rights and ethical business practices. BCAA's Supplier Code of Conduct requires all subject suppliers to comply with the core labour conventions of the International Labour Organization and prohibits subject suppliers and their sub-contractors from using forced labour and child labour.
- BCAA's Procurement Policy sets out best practices for the acquisition of goods and services at BCAA, including requiring BCAA employees to conduct due diligence appropriate in the circumstances against suppliers, and make suppliers aware of and have them agree to comply with BCAA's Supplier Code of Conduct.
- BCAA's Competitive Processes Guidelines set out guidelines for soliciting information about suppliers as well as soliciting and reviewing quotes and proposals from suppliers in connection with the potential acquisition of goods and requires BCAA employees to conduct due diligence appropriate in the circumstances against short-listed vendors.
- BCAA's Supplier Due Diligence Questionnaire is a tool BCAA employees may use to assess the risk that forced labour or child labour is used in connection with a supplier's goods. The questionnaire requires suppliers to confirm whether forced labour or child labour is used in connection with the goods, and by completing the questionnaire, suppliers agree to comply with BCAA's Supplier Code of Conduct.
- BCAA's Vendor Performance Management Program Procedure sets out the framework for the review and management of BCAA's suppliers and requires that BCAA employees ensure that suppliers are regularly assessed across multiple metrics. As part of ongoing supplier management, BCAA employees are required to monitor a supplier's compliance with BCAA's Supplier Code of Conduct. Suppliers that score low during the assessment process will be asked to make necessary improvements and if such improvements are not met with the prescribed period, alternative measures will be considered, including replacing the supplier.
- BCAA's Contract Management Policy provides a framework for the management of contracts with suppliers and outlines the responsibility of BCAA employees who purchase goods on behalf of BCAA to diligently manage the supplier relationship and ensure the terms of the contract and BCAA's Supplier Code of Conduct are complied with.

Further, BCAA strives to do business with suppliers who engage in ethical business practices and foster BCAA's values, and we take great care in selecting our suppliers. Through our ongoing communications with our suppliers and reasonable due diligence efforts, BCAA has garnered comfort that, to the best of our knowledge, none of our key international suppliers use forced labour or child labour in the production of the goods BCAA imports into Canada.

Training and Awareness of BCAA's Policies and Procedures

During the 2024 fiscal year, BCAA employees involved in importing goods were required to participate in training on the prevention of forced labour and child labour in our business and supply chain. Additionally, as part of annual compliance training all BCAA employees are obligated to attest that they will comply with BCAA's corporate policies, including the policies described above.

Reporting and Remediation

BCAA employees are encouraged to use BCAA's confidential and anonymous Code of Conduct and Ethics Hotline or web and email-based confidential reporting tools to share concerns about unethical practices or business conduct. During BCAA's 2024 fiscal year, we did not receive any complaints through our ethics reporting system related to forced labour or child labour. Accordingly, it has not been necessary for us to undertake any remediation measures with respect to forced labour and child labour, nor has it been necessary for us to undertake any measures to remediate the loss of income to families and individuals that could result from any measure taken by us to eliminate the use of forced labour or child labour in our business and supply chain.

Assessing the Effectiveness of BCAA's Actions

BCAA's policies, procedures, and training work together to mitigate the risk that BCAA's suppliers engage in exploitative labour practices. To assess the effectiveness of BCAA's current policies, procedures, and training materials, we rely on the obligation of our employees to report violations of our Code of Conduct, tracking the number of cases reported and solved through our ethics reporting system, and ongoing communications with our international suppliers.

Approval

This report was approved by the Board of Directors of British Columbia Automobile Association on behalf of each entity covered by this report, pursuant with subparagraph 11(4)(b)(ii) of the Act.



I have the authority to bind British Columbia Automobile Association.

Bill Snell
Chair of the BCAA Board of Directors

March 14, 2025