



# Canada Supply Chains Act Statement

2025 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 2025 fiscal year of October 1, 2024, to September 30, 2025.

BCAA unequivocally opposes the use of forced labour and child labour and is committed to maintaining the highest standards of ethical conduct and integrity in all aspects of its operations. This commitment is embodied in BCAA's policies and procedures, which require all employees to act ethically, in good faith, and in strict compliance with all applicable legislation. Furthermore, BCAA is dedicated to engaging with vendors who demonstrate a robust commitment to corporate social responsibility and whose practices are consistent with BCAA's ethical standards.

## Overview of BCAA

BCAA serves approximately 1 in 2 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, BCAA Auto Marketplace, BCAA Task 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 British Columbia 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's primary operations do not involve the production of tangible goods within or outside Canada, nor is it predominantly focused on importing substantial volumes of tangible items. During the 2025 fiscal year, BCAA's import activities were minimal. Goods were primarily imported from vendors located in the United States, China, the United Kingdom, India, and France. These imports supported the operational needs of Evo cars and the E-bike projects, including sourcing essential bike components. Additional noteworthy import purchases included physical maps and external connection drives for televisions. Pins for the BCAA Fireweed pin project, as well as envelopes and letters used in marketing initiatives, were sourced from vendors based in the United States. Following a comprehensive evaluation of vendor supply chain processes and policies, BCAA introduced a new import vendor from India to supply bike parts. Given the relatively low volume and value of import activity in the 2025 fiscal year, the risk of exposure to forced or child labour is assessed as minimal. Furthermore, BCAA import purchases undergo scrutiny for potential forced or child labour involvement, including requesting and reviewing of substantiating documents, namely copies of the vendor's human rights, anti-child labour policy and ethics policy. The application of risk mitigation tools such as the BCAA Supplier Due Diligence Questionnaire and other relevant policies and procedures outlined below continues to reinforce BCAA's commitment to addressing and reducing the risks associated with vendors potentially engaging in forced or child labour.

# BCAA's Policies and Procedures

To mitigate the risks associated with forced labour and child labour within its supply chain, BCAA has established comprehensive policies and procedures specifically designed for the assessment, selection, and management of vendors.

- The BCAA Code of Business Conduct establishes ethical principles and standards that all employees are expected to adhere to when conducting business. The BCAA Code of Business Conduct places a great deal of emphasis on critical aspects of ethics, including respect for human rights, adherence to legal requirements, personal integrity, confidentiality of information, avoidance of conflicts of interest, and supplier and employee rights. Additionally, it outlines procedures for reporting breaches of ethical standards. All BCAA employees are obligated to demonstrate utmost professional and personal integrity. The BCAA Code of Business Conduct promotes transparency and promotes compliance with BCAA's core values through a zero-tolerance policy towards any unethical behavior.
- The BCAA Supplier Code of Conduct sets forth the organization's expectations pertaining to topics such as discrimination, ethical behavior, legal compliance, child and forced labour, health, and safety standards that vendors and their subcontractors are required to adhere to. The BCAA Supplier Code of Conduct requires adherence to the International Labour Organization's core labour conventions and expressly prohibits both vendors and their subcontractors from engaging in forced or child labour. Employees involved in procurement-related activities are responsible for sharing the link to the BCAA Supplier Code of Conduct with vendors to ensure that they are informed of all relevant standards and expectations. The Corporate Procurement Department is responsible for ensuring the timely publication of any updates to the BCAA Supplier Code of Conduct.
- BCAA's Procurement Policy provides a comprehensive set of best practices and guidelines for members of the BCAA organization who engage in procurement-related activities. Key mandatory requirements include informing vendors about BCAA's Supplier Code

of Conduct. Additionally, it is imperative that purchasers share the BCAA Supplier Due Diligence Questionnaires with both new and existing vendors who provide BCAA with tangible goods on an annual basis. The purchaser is responsible to collect completed and signed Questionnaires from the applicable vendors. In accordance with the BCAA Procurement Policy, all members of the BCAA organization who engage in procurement related activities are required to adhere to the established procurement guidelines and best practices detailed in the policy.

- BCAA's Competitive Process outlines the protocols that govern the competitive bidding and procurement activities within the organization. The Corporate Procurement Department manages the administration of competitive bids, including Requests for Proposals and Requests for Information for departments within BCAA. The Competitive Process provides a framework designed to ensure that all bids are conducted impartially and transparently, affording equal opportunity for all potential, participating vendors. BCAA employees are required to conduct comprehensive due diligence, such as vendor background and reference checks, when assessing prospective vendors. The Corporate Procurement Department regularly evaluates and improves these processes to strengthen effective governance.
- The BCAA Supplier Due Diligence Questionnaire is a structured tool designed to assess whether potential import vendors' supply chain activities and processes include the use of forced or child labour. The questionnaire primarily evaluates vendors' policies and procedures relating to the prohibition of forced and child labour, with particular emphasis placed on risk mitigation initiatives implemented to prevent such practices within their supply chains. Vendors are required to complete the questionnaire, disclose any risks associated with forced or child labour in their operations, and provide supporting documentation or links to relevant policies and procedures. BCAA employees must distribute the BCAA Supplier Due Diligence Questionnaire annually to international vendors supplying tangible goods to BCAA.

## Awareness of BCAA's Policies and Procedures

- BCAA's Vendor Performance Management Program Procedure establishes a comprehensive framework for reviewing and managing vendors. It mandates that BCAA employees regularly evaluate vendors using a set of predetermined metrics. In accordance with the BCAA Vendor Performance Management Process, Corporate Procurement in collaboration with relevant departments within BCAA, conducts monthly vendor scorecard evaluations to measure a vendor's performance and compliance with contractual obligations and other deliverables. Vendors scoring below the predetermined, acceptable thresholds must implement necessary improvements; failure to do so within the designated timeframe may result in alternative actions, including the potential termination of business relations with the underperforming vendor. To ensure effective vendor management, BCAA employees are also responsible for monitoring vendors' adherence to BCAA's Supplier Code of Conduct.
- BCAA's Contract Management Policy provides a structured framework for BCAA employees and contract relationship owners to effectively administer and manage vendor contracts, contractual deliverables and obligations. Employees are expected to manage vendor relationships diligently to ensure adherence to all applicable contractual terms, deliverables and BCAA's Supplier Code of Conduct.

BCAA is committed to engaging with organizations that uphold ethical standards and reflect BCAA's core values. Employees of BCAA consistently adhere to established protocols, ensuring impartiality, transparency, and ethical conduct throughout vendor selection and all business engagements. Through ongoing communication and rigorous due diligence processes with vendors, BCAA has, to the best of its knowledge, confirmed that none of its international vendors utilizes forced or child labor in the production of goods imported into Canada.

Throughout the 2025 fiscal year, BCAA employees who engaged in importing goods were required to provide the BCAA Supplier Due Diligence Questionnaire to vendors prior to engaging in business with the vendor. Upon receiving the completed questionnaire from the vendor, the employee was responsible for thoroughly reviewing the responses. To ensure compliance with the Canada Supply Chains Act and to support BCAA's commitment to prevent forced labour and child labour practices, purchasers and employees responsible for importing goods were also required to request relevant supporting documentation, namely, certificates of compliance or procedural documents to substantiate the information provided by vendors.

During the same period, the BCAA Corporate Procurement Department conducted multiple procurement reviews on executed contracts. As part of ongoing efforts to raise awareness about the requirements of the Canada Supply Chains Act and reinforce BCAA's stance against forced and child labour, a question pertaining to the completion and receipt of the BCAA Supplier Due Diligence Questionnaire was incorporated into the procurement review checklist. Furthermore, all BCAA employees are required, as part of their annual compliance training, to attest that they adhere to BCAA's corporate policies, including those related to supply chain integrity.

## Reporting and Remediation

BCAA provides employees with confidential and anonymous channels for reporting concerns related to unethical business practices, including its Code of Conduct and Ethics Hotline, as well as web and email-based tools. In the 2025 fiscal year, no complaints pertaining to forced labour or child labour were submitted through these reporting mechanisms. Furthermore, the responses on the BCAA's Supplier Due Diligence Questionnaires indicated no potential risks associated with forced or child labour during this period. Accordingly, remediation measures addressing these issues have not been necessary.

## Assessing the Effectiveness of BCAA's Actions

BCAA implements comprehensive policies, procedures, and training programs designed to mitigate the risk of vendors participating in exploitative labor practices. To assess the effectiveness of these initiatives, BCAA relies on employees to uphold their responsibility by reporting any violations of the Code of Conduct, systematically tracks the cases submitted and resolved through its ethics reporting platform, and sustains ongoing communication with international vendors.

## 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.



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**Bill Snell**  
**Chair of the BCAA Board of Directors**

I have the authority to bind British Columbia Automobile Association.

**March 12, 2026**