

# Supplier Code of Conduct

BCLC is committed to advancing social purpose and sustainable procurement objectives and expects our suppliers, whether work is done in Canada or elsewhere, to have responsible business practices, operations and processes that are socially responsible and sustainable.

This BCLC Supplier Code of Conduct (“**Supplier Code**”) sets out the minimum standards for our suppliers and their subcontractors/suppliers to promote safe and healthy workplaces, basic fair labour practices and environmental responsibility.

## Introduction

This Supplier Code incorporates the core principles of the International Labour Organization (ILO), the Fair Labour Association (FLA), Canadian laws and other applicable environmental and ethical standards that BCLC follows. These conventions establish achievable minimum standards for working conditions in facilities internationally and directly support the Universal Declaration of Human Rights.

BCLC considers a supplier’s compliance with this Supplier Code, and willingness to address any compliance concerns that BCLC may identify, as a key factor in BCLC’s decision to maintain an ongoing business relationship with a supplier. Suppliers may be required to provide documentation to substantiate compliance with this Supplier Code.

BCLC may discontinue business with suppliers who are not responsive to requests to address concerns around workplace practices and instances of non-compliance with this Supplier Code.

## Standards

### NO FORCED LABOUR

The Supplier and its subcontractors shall employ workers who choose to be employed. All work shall be voluntary, and workers shall be free to leave upon reasonable notice. There shall be no use of forced labour, including prison labour, indentured labour, bonded labour or other forms of forced labour.

### MINIMUM AGE OF EMPLOYMENT

The Supplier shall not utilize child labour in any stage of manufacturing or provision of services. No persons shall be employed under the age of 15 (or 14 where the law of the country of manufacture or service allows) or younger than the age for completing compulsory education in the country of manufacture or service, whichever is higher. Workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers. The use of younger workers enrolled in legitimate workplace apprenticeship programs which comply with all laws and regulations of the applicable country are permitted as an exception to the minimum age requirements set out above.

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## NON-DISCRIMINATION

The Supplier shall promote cooperation, individual responsibility and acceptance of diversity among its employees and sub-contractors. Hiring and employment practices such as compensation, advancement, promotions, rewards, access to training, discipline, termination or retirement must be made solely on the basis of knowledge, skill, efficiency and ability to do the job and meet its requirements. The Supplier, its employees, and subcontractors shall not engage in discrimination and no person shall be discriminated against on the basis of race, colour, age, gender, sexual orientation, ethnicity, nationality, disability, place of origin, ancestry, source of income, pregnancy, religion, political affiliation, union membership, family status or marital status. In addition, workers or potential workers should not be subjected to medical tests that could be unlawfully used in a discriminatory way.

## HEALTH AND SAFETY

The Supplier will ensure that all workers involved in any stage of manufacturing or provision of services will be provided with a safe and healthy work environment. Conditions in all work and residential facilities shall be safe, clean and consistent with all applicable laws and regulations regarding occupational health and safety. The Supplier shall adequately inform employees of their health and safety guidelines in terms of equipment, training, management and work practices.

## EMPLOYEE TREATMENT, HARASSMENT AND ABUSE

The Supplier's employees shall be treated with respect and dignity and the Supplier's disciplinary policies and procedures shall be clearly defined and communicated to employees before application. There shall be no harsh and inhumane treatment, including any physical, sexual, psychological, verbal harassment or abuse, or corporal punishment; nor is there to be the threat of any such treatment.

## FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The Supplier shall work directly with its employees to find solutions to any outstanding legal and employment issues while at all times respecting worker rights to obtain representation and/or bargain collectively. Workers shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

## THE RIGHT TO ORGANIZE

The Supplier shall allow workers and employees to have the right to establish and join labour organizations of their own choosing and elect their representatives, for the purpose of furthering and defending the interests of workers or of employers.

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## WAGES AND BENEFITS

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Employees shall be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or provision of services or, in those countries where such laws do not exist, at a rate at least equal to their regular hourly compensation rate. Deductions from wages as a disciplinary manner is not permitted and payment shall occur in a timely manner with pay stub or similar documentation. Suppliers shall ensure the application of the principle of equal remuneration for all workers, regardless of gender, for work of equal value.

## HOURS OF WORK

The Supplier shall ensure regular working and overtime hours do not exceed the maximum stipulated under local, regional, or national legislation except in extraordinary circumstances.

## ANTI-CORRUPTION BUSINESS PRACTICES

The Supplier will not, directly or indirectly, pay, give, offer or promise anything of value to any local or foreign government official (or to any person for the benefit of a government official) for the purpose of corruptly causing the government official to improperly act or use their influence in obtaining or retaining any business or securing any improper advantage for BCLC or the Supplier.

## ENVIRONMENTAL RESPONSIBILITY

The Supplier shall be responsible to reduce the environmental impact of their products and services as well as their overall operations or 'in-house' practices. The Supplier must not be in violation of any national or provincial environmental regulations. The Supplier must be adopting responsible measures to mitigate negative environment impacts.