Supplier Code of Conduct

Introduction

BCLC is committed to advancing social purpose and sustainable procurement objectives and expects 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 suppliers and their subcontractors and suppliers to promote basic fair labour practices, safe and healthy workplaces, and environmental and ethical responsibility. This Supplier Code incorporates the core principles of the International Labour Organization (ILO), the Fair Labour Association (FLA), the Universal Declaration of Human Rights, Canadian laws and other applicable environmental and ethical standards that BCLC follows.

BCLC expects suppliers to declare their compliance with this Supplier Code and to ensure these standards are being adhered to by their subcontractors and suppliers. BCLC considers a supplier's stated compliance with this Supplier Code, and willingness to address any compliance concerns that BCLC identifies, as a key factor in BCLC's decision to establish and maintain ongoing business relationships with suppliers.

Suppliers may be required to provide documentation to demonstrate compliance with this Supplier Code. BCLC may discontinue business with a supplier who is not responsive to requests to provide documentation and address concerns around their business practices, operations and processes, and instances of non-compliance with this Supplier Code.

Standards

General Business Ethical Standards

Suppliers are expected to conduct their business in an ethical manner and to consider the social, environmental, and governance credentials and performance of subcontractors and suppliers within their own supply chain.

Suppliers are responsible for reporting instances of non-compliance with this Supplier Code to BCLC immediately. This includes all violations such as fraud, theft, violations of applicable laws, violations in accounting or auditing standards and controls, and violations of respectful workplace, privacy, safety, or environmental standards. Reports should be made in accordance with BCLC's Safe Reporting Policy and Procedure for Contractors which can be accessed here.

No Forced Labour

Suppliers 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

Suppliers shall not utilize child labour in any stage of manufacturing or provision of services. Child labour refers to work that deprives children (any person under 18) of their childhood, their potential and their dignity, and that is harmful to their physical and/or mental development. It refers to work that is mentally, or morally dangerous and harmful to children; and/or interferes with their schooling by: (i) depriving them of the opportunity to attend school; (ii) obliging them to leave school prematurely; and/or (iii) requiring them to attempt to combine school attendance with excessively long and heavy work.

Suppliers shall not hire people under the age of 15, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age will apply. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety. Suppliers shall ensure workers in the age group 15-17 are employed according to the protective restrictions prescribed by local laws. Where local laws do not exist or where they set lower standards than the ILO standards, the ILO standards shall prevail.

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.

Non-Discrimination

Suppliers will promote cooperation, individual responsibility and acceptance of diversity among its workers. Suppliers shall ensure:

- No person is 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;
- Hiring and employment practices such as compensation, advancement, promotions, rewards, access to training, discipline, termination or retirement are based solely on the knowledge, skill, efficiency and ability of the worker to do the job and meet the job requirements;
- Workers or potential workers are not subjected to medical tests that could be unlawfully used in a discriminatory way; and
- Pregnant workers shall only be assigned work tasks appropriate for, and not threatening to, their condition.

Health and Safety

Suppliers shall:

- Provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of supplier's facilities;
- Inform workers of their health and safety guidelines in terms of equipment, training, management, and work practices;
- Take action to prevent accidents and injuries to health occurring in the course of work, and investigate and take corrective action to address root causes when workplace health and safety incidents occur; and
- Ensure that any living facilities provided for workers are safe and clean and meet the basic needs of workers.

Worker Treatment, Harassment and Abuse

Suppliers shall ensure:

- Workers are treated with respect and dignity;
- Disciplinary policies and procedures are clearly defined and communicated to workers; and
- Workers are treated humanely and there is no harsh 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

In alignment with the ILO Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87) and Right to Organise and Collective Bargaining Convention, 1949 (No. 98), suppliers shall:

- Ensure workers are able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment;
- Recognize and respect that workers 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; and
- Ensure that workers' representatives are not discriminated against and have reasonable access to carry out their representative functions in the workplace.

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. Suppliers shall:

- Pay worker wages in a timely manner with a pay stub or similar documentation;
- Compensate workers 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;
- Ensure regular working and overtime hours do not exceed the maximum stipulated under local, regional, or national legislation except in extraordinary circumstances;
- Not make direct wage deductions from workers' pay as a disciplinary measure and, where a worker is suspended without pay, infractions must be proven openly and promptly; and
- Apply the principle of equal remuneration for work of equal value to all workers.

Environmental Responsibility

Suppliers shall:

- Comply with all applicable environmental laws; and
- Take responsible measures to reduce and mitigate negative environmental impacts of their products and services, as well as their overall operations and 'in-house' practices.

Indigenous Rights

Suppliers are expected to respect the rights, cultures, interests and aspirations of Indigenous Peoples and be guided by the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the ILO Indigenous and Tribal Peoples Convention, 1989 (No. 169).

Suppliers operating in Canada are expected to understand and uphold the findings of the Truth and Reconciliation Commission of Canada (TRC) calls to action, and to adopt a reconciliation framework into their policies, norms, standards, and operational activities as described in TRC Call to Action 92 – Business and Reconciliation.

Anti-Corruption Business Practices

Suppliers shall 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. In the event that a supplier is approached by any person, including a government official, to improperly use their influence to secure an improper advantage to the supplier in return for an improper advantage to such person, the supplier must report such incident in accordance with BCLC's Safe Reporting Policy and Procedure for Contractors which can be accessed here. For the purposes of this provision, "government official" includes a BCLC employee.

Transparency

Suppliers shall refrain from knowingly providing inaccurate or misleading information in response to any kind of invitation to submit a bid or proposal, engaging in questionable or unethical financial or accounting practices, and engaging in any deceptive marketing practices.

Illegal or Unethical Bidding

Suppliers shall refrain from illegal or unethical bidding practices such as collusion, bid-rigging, price-fixing, or other practices prohibited by federal or provincial statutes.

Audit

BCLC maintains the right to monitor a supplier's compliance to this Supplier Code and audit a supplier's business practices, operations and processes. BCLC is entitled to request information from a supplier as to their compliance with the principles of this Supplier Code.

Reporting

Any person with reason to believe that the principles of this Supplier Code are not being respected by a BCLC supplier is asked to report in accordance with BCLC's Safe Reporting Policy and Procedure for Contractors which can be accessed here.