



## Annual Compliance Report on Forced Labor and Child Labor in Supply Chains

Based upon the requirements of Canadian Legislative Bill S-211 for the most recently completed financial year beginning on January 1, 2024 and ending on December 31, 2024.

May 22, 2025

SCP Distributors Canada, Inc.  
373 Elgin Street  
Brantford, Ontario  
N3S 7P5  
Canada  
<https://www.scppool.com/>

This report is presented by SCP Distributors Canada, Inc. (“SCP Canada”) in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S-211) (the “Act”), to detail its commitment and efforts to prevent forced labor within its supply chain. In this report, we will share the measures we have implemented to identify, assess, and mitigate the risk of forced labor in our supply chain for FY 2024.

## **Corporate Structure, Activities, and Supply Chains**

SCP Canada is a corporation registered in Ontario, Canada under the applicable laws with a business address at:  
373 Elgin St.  
Brantford, Ontario  
N3S 7P5

SCP Canada is a Canadian resident corporation using business no. 864278411RM0001. SCP Canada is a wholly owned subsidiary of SCP Distributors LLC, which is a wholly owned subsidiary of Pool Corporation. Pool Corporation is incorporated under the laws of Delaware and has its headquarters in Covington, Louisiana, USA.

SCP Canada is governed by a board of directors. SCP Canada management operates day-to-day business functions and activities.

SCP Canada is part of a distribution network of swimming pool supplies, equipment and related leisure products. Our inventory includes a diverse range of products, from construction materials, replacement parts and fencing to pool care products and spas.

SCP Canada globally sources chemicals, equipment, construction materials, and other categories of products to serve customers in the pool retail, service, and construction business.

## **Policies and Due Diligence Processes**

Respect for human rights is a fundamental building block for SCP Canada. Suppliers that choose to work with SCP Canada are expected to embody the same principles.

SCP Canada prohibits all forms of child or forced labor, slavery, or human trafficking in any of its operations and facilities. We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

SCP Canada’s Supplier Code of Conduct ensures that all workers involved with the manufacturing of products that SCP Canada sells adheres to treaties, conventions, laws and regulations prohibiting human trafficking, slavery, bonded (including debt bondage) or indentured labor, forced labor, child labor, prison labor, non-payment of minimum wages, overtime pay, rest periods and holidays, and freedom of association. We expect our supply chain partners to share our values and commitment to ethics, safety and health and environmental stewardship. Importantly, we expect suppliers to uphold the human rights of workers, to treat them with dignity and respect, and to conduct responsible business with integrity, honesty, and transparency.

SCP Canada’s standard Terms and Conditions of purchase likewise require that its suppliers comply with applicable laws, rules, and regulations, including those pertaining to human trafficking and slavery.

SCP Canada’s Human Rights Policy works in tandem with the Code of Conduct and the Terms and Conditions. That policy sets for the following guiding philosophies:

- Respect for individuals regardless of nationality, race, sex, or anything that makes each human being unique.

- Compliance with all laws, including all employment laws and regulations, in every country and jurisdiction in which our suppliers operate.
- Respect for the environment, including the people within each jurisdiction in which our suppliers operate.
- Social consciousness and full awareness that the countries in which people are born in and/or the parents to whom they are born to sometimes do not provide individuals the opportunities that others are so fortunate to have.

Compliance with our Human Rights policy and applicable laws is the responsibility of every employee and contractor acting on our behalf and is a condition of their employment or contract.

All new suppliers must agree to these forms. These documents also allow SCP Canada to conduct audits (either itself or through third parties) to gauge suppliers' compliance with the applicable laws, including those related to slavery and human trafficking. Any such audits may be either announced or unannounced.

Under the Code of Conduct, suppliers are expected to report any fact or circumstance which they know has resulted or will result in a violation of the Code. It is the policy of SCP Canada and our expectation of suppliers not to permit retaliation for a person's good faith report of questionable behavior and/or misconduct by another. Any supplier may direct questions or comments about the Code of Conduct or report any violations to the supply management representative, the director of sourcing, or any vice president.

Employees may also report concerns regarding unethical behavior or a possible violation of our Code of Business Conduct and Ethics anonymously through an independent third-party provider that offers 24/7 access via a toll-free hotline or online. These reports are reviewed by our human resources and legal teams and disclosed quarterly to our Board of Director's Audit Committee.

## **Forced Labour and Child Labour Risks**

SCP Canada acknowledges its responsibility to collaborate with vendors who share our values, and our team communicates regularly with our suppliers, conducting due diligence before and during our business relationship. While SCP Canada has a global supply chain, it performs assessments of certain high-risk regions based on available international data and information. Suppliers are required to sign off and adhere to compliance obligations found in the Code of Conduct and Terms and Conditions. SCP Canada also evaluates its supply chain for the potential presence of conflict minerals from covered countries.

Across our operations and through our supply chain, our expectations of ethical practice with regard to labor conditions remain as stringent as ever. We operate in full compliance with wage, work hours, overtime, and benefits laws.

## **Remediation and Measures for Assistance**

SCP Canada is not aware of any form of child or forced labor, slavery, or human trafficking in any of its operations, facilities, or from vendor partners/suppliers.

If a possible violation is discovered, SCP Canada will send a notice of corrective action required from a supplier with respect to the potential violation of applicable laws and regulations. The supplier shall present information to SCP Canada on the issue and adopt corrective actions to remedy and prevent potential violations of applicable laws and regulations.

## Training

SCP Canada's Code of Business Conduct and Ethics reflects our deep commitment to ethical behavior across the organization. To maintain awareness and ensure a robust culture focused on integrity, we require our employees to complete ethics and compliance training annually.

We also encourage our employees to direct questions or report concerns or violations to their supervisor, any member of our senior management team, our human resources department or our legal department.

To help each of our employees achieve success, we emphasize continuous development opportunities and training that includes safety and security protocols, product and service updates, and technology skills enhancement.

## Assessing Effectiveness

SCP Canada continually assesses the effectiveness of its policies and codes of conducts to prevent forced labour and child labour in its supply chains. The SCP Canada Supplier Code of Conduct allows for audits (either itself or through third parties) to gauge suppliers' compliance with the applicable laws concerning slavery and human trafficking.

Internally, SCP Canada's Code of Business Conduct and Ethics governs SCP Canada employees and expectations.

At SCP Canada, we remain steadfast in our commitment to ethical sourcing and supply chain integrity. SCP Canada is committed to continuing taking steps in identifying risks and initiating actions to ensure compliance within our supply chain.

## Attestation

This report has been reviewed and approved by the appropriate governing body of SCP Distributors Canada, Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in the capacity of Director, attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

*Brent Milburn*

Brent Milburn  
Director, SCP Distributors Canada, Inc.  
May 22, 2025

I have the authority to bind SCP Distributors Canada, Inc.