



FIGHTING AGAINST FORCED LABOUR & CHILD LABOUR  
IN SUPPLY CHAINS ACT SUPPLIER QUESTIONNAIRE  
("Supplier Questionnaire").

Background:

BMW Group Canada expects all its suppliers, and their supply chain partners must ensure their compliance with forced and child labour laws.

BMW Group Canada is required to comply with the Canadian legislation entitled "[Fighting Against Forced Labour & Child Labour in Supply Chains Act and to amend the Customs Tariff](#)" (the "Act"), which aims to increase industry awareness, transparency and drive businesses to improve practices in relation to forced and child labour. BMW Group Canada has implemented a due diligence process to assist us in identifying any modern slavery risks in its supply chains to address any identified risks.

Each supplier must be complete this Supplier Questionnaire (where applicable), sign and return it to BMW Group Canada. Any questions regarding the content of this document must be addressed to BMW Group Canada.

1. CONTACT DETAILS:

(Please provide contact details for the designated representative responsible in your organization)

Company Name      Spreadly, Inc.

Contact Name      Nellie Vail

Phone      888-727-7250

E-mail      nellie@spreadly.com

2. APPLICABILITY OF THE ACT:

(Is your organisation subject to report to the Minister of Public Safety your compliance with the Act?)

Question	Supplier Responses
<b>YES</b> - our organization <b>IS</b> subject to report to the Minister of Public Safety our compliance with the Act.	Yes <input type="checkbox"/> <b>If YES, please complete this Supplier Questionnaire, sign and return to BMW Group Canada. Please provide a link to your most recent submitted report to the Minister of Public Safety confirming your compliance with the Act.</b>
<b>NO</b> - our organization <b>IS NOT</b> subject to report to the Minister of Public Safety our compliance with the Act.	No <input checked="" type="checkbox"/> <b>If NO, YOUR ORGANIZATION IS NOT REQUIRED TO COMPLETE THE QUESTIONS IN SECTION 3. Please provide your acknowledgement in Section 4 by signing and returning this document to BMW Group Canada.</b>
Please provide additional information if required:  This does not apply to Spreadly because Spreadly is not a supplier of physical goods. Spreadly is a vendor of cloud based services	



3. QUESTIONS

(If your organization has answered "YES" in Section 2 above, Please provide responses to all questions set out in this Section 3 below):

	Question	Supplier Responses
1	Did your organization on or before May 31st of the relevant reporting year, submit a report to the Minister of Public Safety confirming your compliance with the Act?	Yes <input type="checkbox"/> No <input type="checkbox"/>
1a.	If yes, was anything adverse reported to the Minister of Public Safety in the relevant reporting year?	
2	Do you currently have written policies (e.g., code of conduct) that includes your commitment to respect human rights and prevent forced and child labour practices in your organization and supply chains?	Yes <input type="checkbox"/> No <input type="checkbox"/>
2a.	Please provide additional information if required:	
3	Do you currently have written policies (e.g., code of conduct) that includes your commitment to respect human rights and prevent forced and child labour practices in your organization and supply chains?	Yes <input type="checkbox"/> No <input type="checkbox"/>
3a.	Please provide additional information if required:	
4	Does your organization provide awareness training to your employees on forced labour and child labour as required under the Act?	Yes <input type="checkbox"/> No <input type="checkbox"/>
4a.	Please provide additional information if required:	



4. ACKNOWLEDGEMENT

We hereby acknowledge receipt of this Supplier Questionnaire received from BMW Group Canada and attest, the information in this document is true, accurate and complete in all material respect for the purposes of the Act.

This Supplier Questionnaire must be signed by officer(s) who have the authority to bind the Corporation.

DocuSigned by:  
  
BE108849DB824F9...  
Name of Officer: Nellie Vail  
Title: CFO  
Date: 2/26/2025

Signed by:  
  
5EF8CD8780C1408...  
Mir Razo Carlos  
Name of Officer: \_\_\_\_\_  
Title: Sr Specialist, Sales  
and Marketing Preowned  
Date: 2/27/2025

**SUPPLIERS ARE ADVISED TO SEEK INDEPENDENT LEGAL ADVICE  
ON THEIR COMPLIANCE REQUIREMENT WITH THE ACT.**