



Fighting Against Forced Labour and Child Labour in Supply Chains Act (S-211)

Key Updates and Preparing for Year 3 Reporting

5 February 2026



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Speakers



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Overview of today's webcast

In addition to some important background information on the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act, S-211), there are five key focus areas we are going to cover in today's session.

1

Overview of reporting requirements

Overview on the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

2

Public Safety Canada's 2026 guidance update

Overview of Public Safety Canada's updates and their implications for reporting in 2026.

3

S-211 reporting trends

2025 Annual Report to Parliament: See how you compare to your peers in the areas of risk identification, risk management, employee training, remediation actions and more.

4

International reporting template

Learn about the new template for international reporting on modern slavery, forced labour and child labour template, designed to reduce administrative burden for entities reporting in multiple jurisdictions.

5

Strategies for success

Insightful tips that can help your organization in its reporting journey, no matter what stage you may be at.

A top-down photograph of children playing marbles on dark, damp earth. Several hands are visible, reaching towards the colorful glass marbles scattered on the ground. The scene is lit by natural light, creating a dappled effect on the soil.

Fighting Against Forced Labour and Child Labour in Supply Chains Act Refresher

Impetus behind the *Fighting Against Forced Labour And Child Labour in Supply Chains Act*

Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*



The International Labour Organization estimates that there are approximately 28 million victims of forced labour worldwide, including 17.6 million in the private economy



There is a risk that goods entering the Canadian market through global supply chains were produced using forced labour or child labour



The Canadian Federal Government enacted the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* to implement its international commitment to fight against forced labour and child labour, increase industry awareness, transparency and drive businesses to improve their practices



Canada's legislation is transparency-based reporting legislation.

Modern slavery legislation in other jurisdictions



Australia:
Modern Slavery Act, 2018



United Kingdom:
Modern Slavery Act, 2015



California:
Transparency in Supply Chains Act, 2010



Germany:
German Supply Chain Due Diligence Act, 2023



France:
Corporate Duty of Vigilance Law, 2017



Norway:
Transparency Act, 2021



Switzerland:
Conflict Minerals and Child Labour Due Diligence Provisions, 2023



European Union:
Corporate Sustainability Due Diligence Directive, 2024 as revised via "Omnibus I" in 2025

Canadian Trends in 2026 - Ethical Supply Chain Services

In September 2025, Public Safety Canada released a public tender for services to support the implementation of Canada's supply chain transparency regime under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (S-211).



Scope

- Improve and advance the analysis of annual reports submitted under the Supply Chains Act (S-211).
- Develop an assessment framework to evaluate the quality and maturity of reporting entities' submissions.
- Enable benchmarking over time and comparisons across reporting entities.



During the first years of implementation, Public Safety Canada focused on raising awareness and supporting organizations in meeting their reporting obligations ahead of the annual deadline. Following the second reporting cycle, the department is now undertaking work to strengthen the effectiveness of the Act by enhancing industry awareness and transparency, encouraging responsible business practices, and supporting compliance with the reporting requirements.

WHY THIS MATTERS

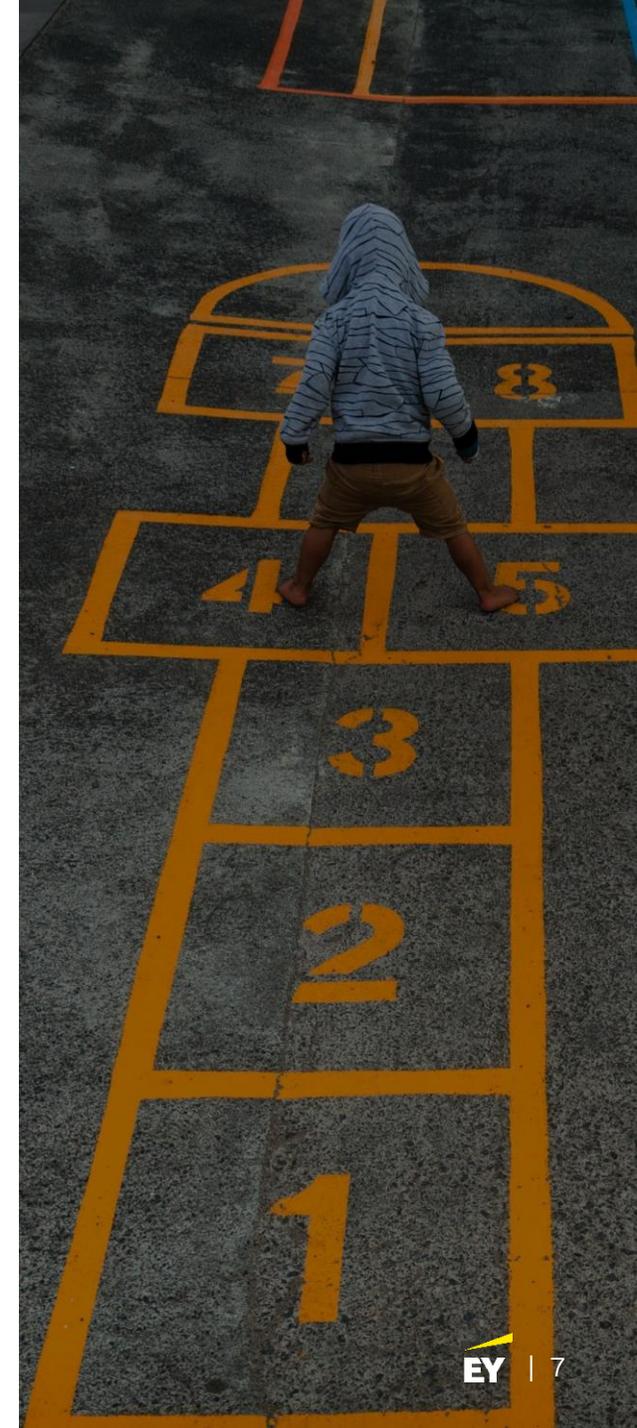
- Builds PSC's ability to assess the **content and quality** of SCA reports.
- This evaluation will help measure **compliance across** reporting entities.
- Enable the **identification of trends** in reporting practices over time.
- Insights from this analysis will support **continuous improvement** in how organizations prepare and submit their reports.

Global Trends for 2026

2026 is shaping up as a key year for evolving mandatory human rights and due diligence expectations. Some jurisdictions are introducing new expectations, updated guidance, and looking to expand enforcement measures that may influence how organizations in Canada approach human rights compliance and forecast any potential supply chain disruptions.

UPDATE OVERVIEW

- With the EU's omnibus legislation nearing completion, there is greater visibility into the emerging direction of European human rights and environmental due diligence legislation.
- Across Asia, developments include ASEAN's 2026-2035 Child Labour Roadmap signaling increased supply chain expectations across the bloc;
- Thailand advancing government led human rights due diligence discussions; and South Korea's National Assembly reviewing mandatory corporate human rights and environmental due diligence bills (such as Bill No. 2210837).
- Requirements will vary by country, but common expectations include supply chain due diligence, governance mechanisms, oversight, and public transparency.

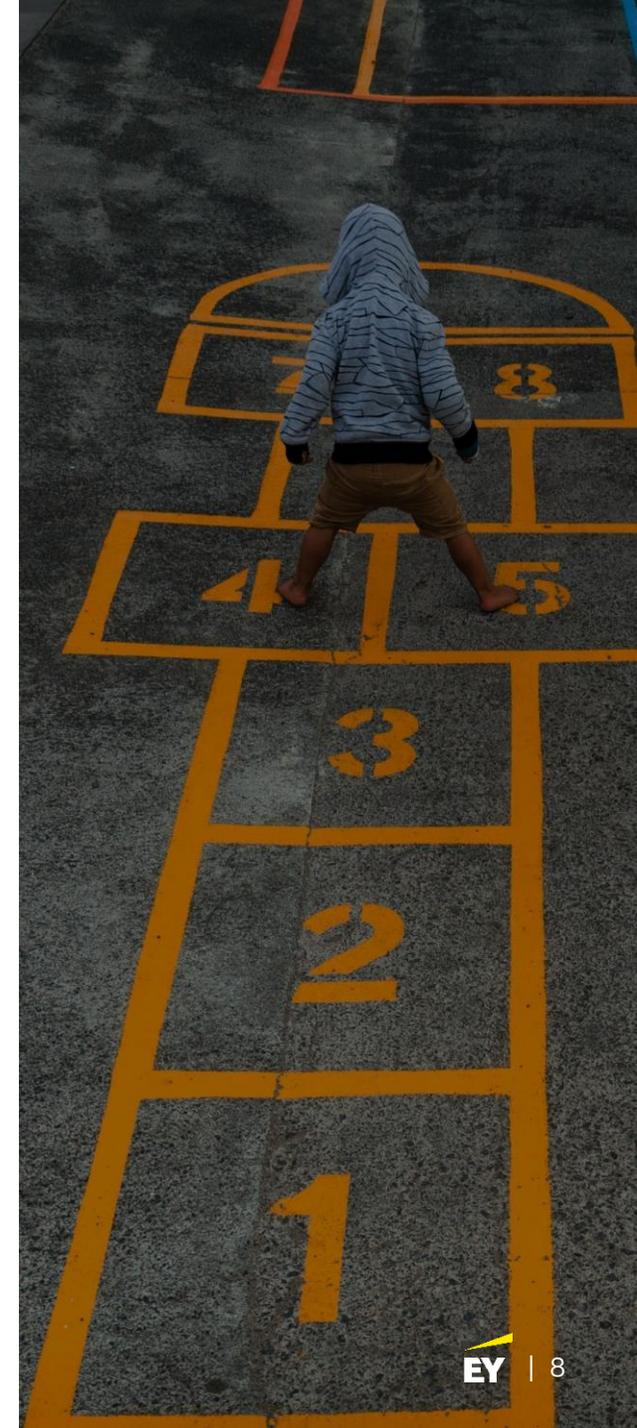


Global Trends for 2026 - Due Diligence Expectations

IMPACT FOR ENTITIES

- These updates signal a global move toward mandatory human rights and environmental due diligence, and in some cases provide for administrative fines, corrective orders and civil liability.
- While Canada's S-211 is a transparency legislation, the human rights due diligence legislation proposed in other jurisdictions goes further by requiring companies to take active steps to mitigate identified risks.
- These developments may add new compliance expectations for multinationals operating or sourcing in Europe and Asia and may increase human rights expectations globally.

The emphasis on supply chain risk identification and mitigation reflects S-211's objectives, reinforcing the need for robust compliance frameworks. However, human rights due diligence legislation requires organizations to take proportionate and reasonable measures to prevent human rights violations.



Report requirements for entities

A report must meet the following requirements to comply with the Act:

- Includes information that responds to each of the mandatory requirements in the Act
- Has received the required approvals and includes the signed attestation
- Is uploaded as a PDF file (not exceeding 100MB)

Include the following mandatory information for each entity:

- a) Structure, activities and supply chains;
- b) Policies and its due diligence processes in relation to forced labour and child labour;
- c) Parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk;
- d) Any measures taken to remediate any forced labour or child labour;
- e) Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains;
- f) Training provided to employees on forced labour and child labour; and
- g) How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.¹

Source:

¹"Fighting Against Forced Labour and Child Labour in Supply Chains Act," Justice Canada, 1 May 2023, 6(1), 6(2), 11(1), 11(3) [Find it here](#).

Report requirements for entities (continued)

Report approval and attestation

The report must be approved by the organization's governing body, or in the case of a joint report either the governing body of each entity included in the report, or by the governing entity that controls each entity included in the report. The report must include an attestation statement and the signature of one or more members of the governing bodies that approved the report.²

Penalties

Under Section 19, every person or entity that:

- Fails to submit a report,
- Fails to publish the report in a prominent place on its website,
- Fail to comply with an order made by the Minister,
- Obstructs or hinders a designated person from performing their duties under the Act,
- Every person or entity that knowingly makes any false or misleading statement or knowingly provides false or misleading information

May be guilty of an offense punishable on summary conviction and liable to a maximum fine of \$250,000.³

Annual reporting deadline

The report must be filed electronically with Public Safety Canada by **31st of May each year.**⁴

Published in a prominent place on the organizations' website.⁵

If the entity is incorporated under the *Canada Business Corporations Act*, the report must be provided to each shareholder, along with its annual financial statements.⁶

The information provided does not, and is not intended to, constitute legal advice; instead, all information, content, and materials are for general informational purposes only.

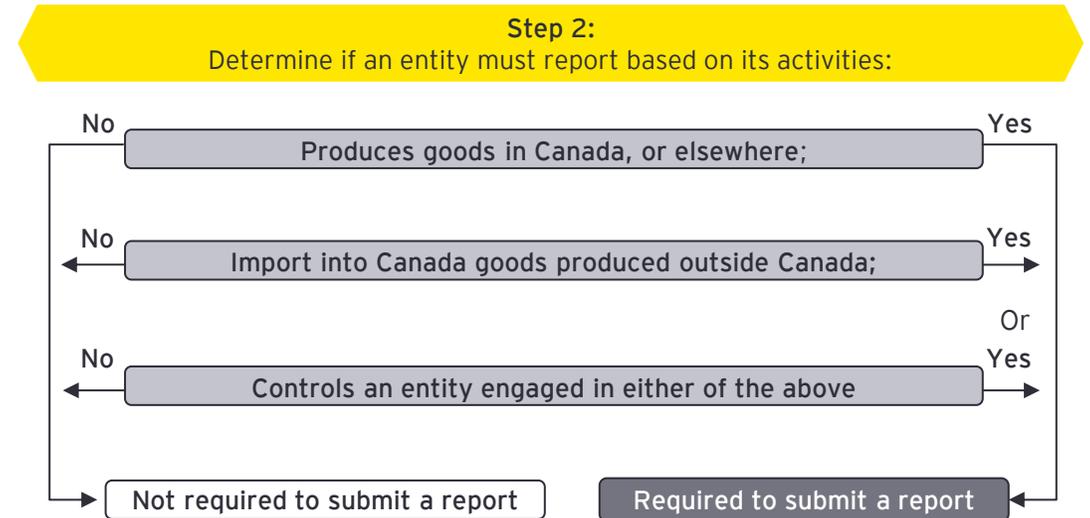
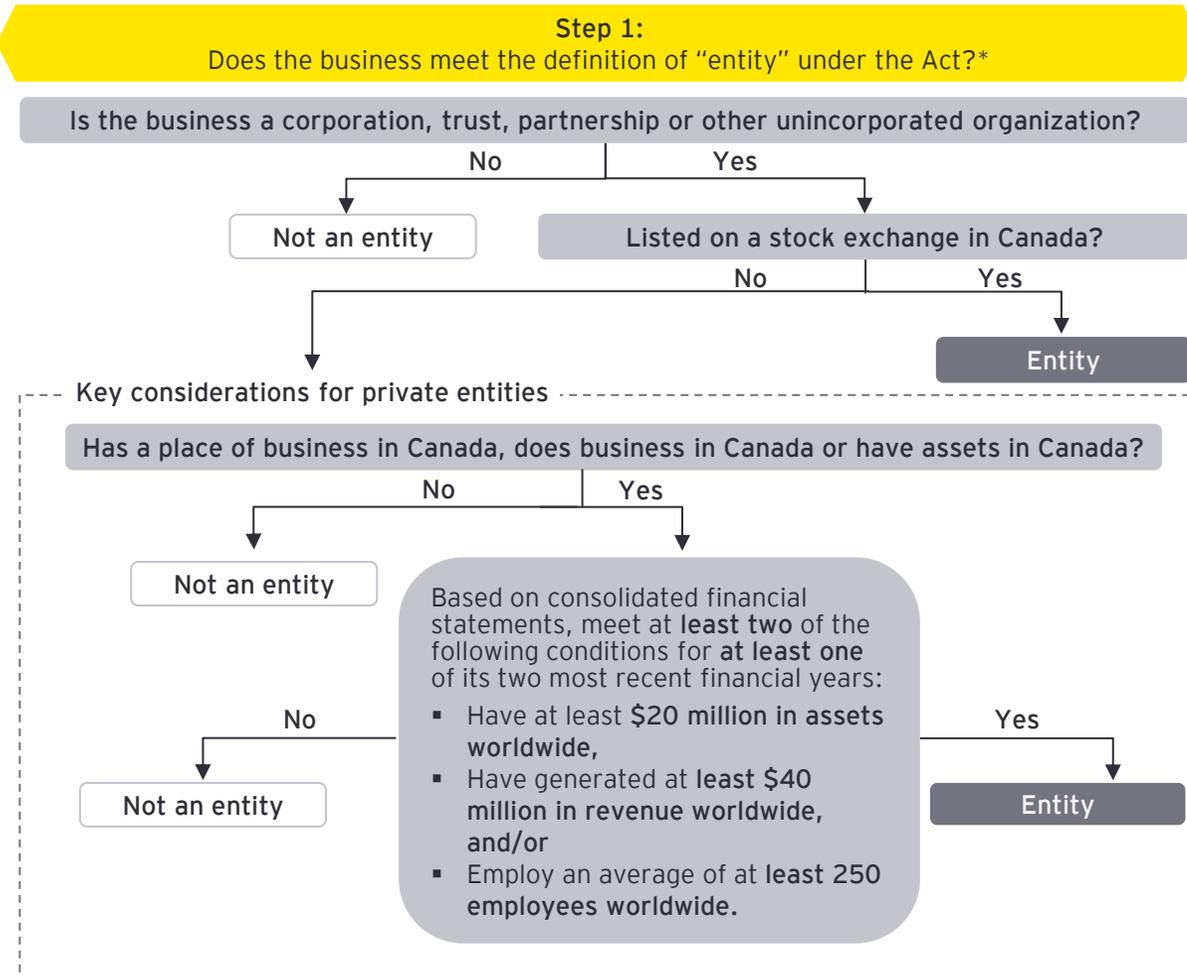
Source:

²"*Fighting Against Forced Labour and Child Labour in Supply Chains Act*," Justice Canada, 1 May 2023, section 11(4), 11(5) [Find it here](#).

³ Ibid, section 19(1), 19(2); ⁴ Ibid, section 11(1); ⁵ Ibid, section 8, 13(1), ⁶ Ibid, section 13(2)

Which entities are required to report annually?

Entities must satisfy Step 1 and Step 2 to be considered in scope of the Act and required to publish an annual report.



Source:

"Prepare a Report - Entities", *Public Safety Canada*, [Prepare a report - Entities](https://publicsafety.gc.ca) (publicsafety.gc.ca), accessed 22 January 2024.

* For additional guidance on whether the Act applies to your entity, refer to "Guidance on the Application of the Act", *Public Safety Canada*, [Prepare a report - Entities](https://publicsafety.gc.ca) (publicsafety.gc.ca) accessed 22 January 2024.

Overview of the annual reporting process

- 1** Prepare a report that meets all the requirements of the Act. Refer to the list of questions in the online questionnaire to determine what information is required and what internal consultations may be necessary to develop your annual report.
- 2** Obtain approval and attestation from the governing body or bodies who have legal authority to bind the entity or entities.
- 3** Complete the online questionnaire that addresses each of the requirements under the Act, ensuring the information is consistent with the information provided in the report.
- 4** Upload attested report at the end of the questionnaire in PDF format not exceeding 100 MB. Entities that opt to submit their report in both Canadian official languages can upload two separate PDF files.
- 5** Publish the submitted report in a prominent place on the entity's website. A copy of the report uploaded will also be made publicly available by Public Safety Canada in an online catalogue.

Public Safety Canada

Canada

National Security | Border Strategies | Countering Crime | Emergency Management | Resources

Home | Countering Crime | Forward Labour in Canadian Supply Chains | Submit a report

Submit a report

Reporting deadline has passed

The 2025 reporting deadline has passed. Public Safety Canada continues to accept late or revised 2025 submissions for publication in the [online catalogue](#).

On this page

- [Step 1: Prepare your documents for submission](#)
- [Step 2: Complete online questionnaire](#)
- [Step 3: Upload annual report](#)
- [Step 4: Confirmation of submission](#)
- [Step 5: Publish report on your website](#)

Step 1: Prepare your documents for submission

To submit an annual report to the Minister of Public Safety, entities and government institutions must complete the online questionnaire and upload their annual report in PDF format.

You must be ready to upload your PDF annual report before completing the online questionnaire.

Step 2: Complete online questionnaire

Entities and government institutions must ensure that the information provided in the questionnaire is consistent with the information provided in their PDF reports.

Entities and government institutions will be asked to confirm that they have read and understand the information in the Data Management Disclaimer and Privacy Notice Statement included at the beginning of the questionnaire.

Entities and government institutions will also be asked to provide the name, title and email address of the person authorized to fill out the questionnaire. Public Safety Canada may use the contact information provided should it require additional details regarding the submission.

The PDF report and the questionnaire are separate requirements, and it is mandatory to complete both.

In the case of an entity submitting a joint report, only the entity submitting the report should complete the questionnaire on behalf of all entities covered by the report.

For more information, see the report requirements for [entities](#) and [government institutions](#).

The questions included in the questionnaire can be viewed at any time without launching the questionnaire. Entities and government institutions may easily refer to the information as they prepare their reports.

[View questions](#)

Step 3: Upload annual report

Entities and government institutions will be asked to upload their completed report in PDF format before they submit the questionnaire. The report file must not exceed 100MB in size.

Entities may submit their report in one or both Canadian official languages. If an entity is submitting in one language only, the report should be uploaded in the appropriate field (English or French) at the end of the questionnaire. If an entity is submitting in both Canadian official languages, it should upload two separate PDF files, one in each field. Each PDF must include a signed attestation and must not exceed 100 MB.

Government institutions are required to upload their reports in both Canadian official languages using the two fields in the questionnaire.

[Launch questionnaire](#)

If an entity or government institution is unable to use the online questionnaire software, it may submit copies of the completed report and questionnaire responses via email to: ps_scai-icse.sq@ps.gc.ca

Step 4: Confirmation of submission

Once the questionnaire is submitted, a confirmation message will be sent to the email address provided. Entities and government institutions will also have the option of downloading a copy of their responses, if desired.

Step 5: Publish report on your website

After submitting a report, entities and government institutions must publish the report in a prominent place on their website. For more information, see the [reporting process overview for entities](#) and the [reporting process overview for government institutions](#).



Public Safety Canada's Guidance Updates for 2026

Public Safety Canada's Guidance Updates for 2026

Newest Public Safety Canada update, issued on February 03, 2026, outlining new tools, process updates, and reporting reminders under the Supply Chains Act.

What's New in This Update

- PSC has introduced a **new process** for distributing unique questionnaire links for Supply Chains Act reporting.

Unique Questionnaire Links

- PSC will distribute **unique questionnaire links** to all entities that previously submitted a report.
- Enables returning to questionnaire in progress, sharing access internally, and working across devices.
- Organizations will receive their unique link via email shortly, and the **link will be sent to the contact information on file from previous reporting years.**
- New reporters may request a link at ps.scai-lcae.sp@ps-sp.gc.ca.
- The standard questionnaire remains available on the [Submit a report](#) webpage.

Public Safety Canada's Guidance Updates for 2026

On December 12, 2025, ahead of the third reporting cycle, Public Safety Canada introduced targeted updates to its online guidance to make the reporting process clearer, including:

1

Simplified language and reduced duplication

Public Safety Canada has streamlined and clarified language across its webpages to make the reporting requirements easier to understand. These updates address recurring questions and common submission errors by removing redundant content and improving overall consistency.

2

Additional clarity on key compliance concepts

The guidance now provides clearer explanations concerning several frequently misunderstood areas, including:

- What constitutes "very minor dealings" under the Act.
 - Attestation requirements, including acceptable signature formats.
 - The need to exclude personal information from all submissions.
-

3

Practical examples added from the international reporting template to support compliance and improve report quality

The updated guidance now incorporates practical examples drawn from the international reporting template released this summer. These examples are intended to support entities in meeting legislative requirements and to help improve the clarity and completeness of submitted reports.

4

List of entities with published reports is available upon request

Public Safety Canada has created a list of entities with reports published in the library catalog as of December 4, 2025. Reports must pass a high-level quality assurance review before they are published in the catalogue. Only submissions that meet minimum requirements are reflected in the list which is updated quarterly.

Clarified minor dealings: added guidance to help organizations know when reporting is required

There is no prescribed threshold for the minimum value of goods that an entity must produce or import to be subject to the reporting obligation. Public Safety Canada clarified:

Very Minor Dealings

Terms in the Act should be understood to exclude “*very minor dealings*”

Importing or producing activities may fall outside the scope if they align with de minimis principles and evaluated within the context of each entity’s overall operations.

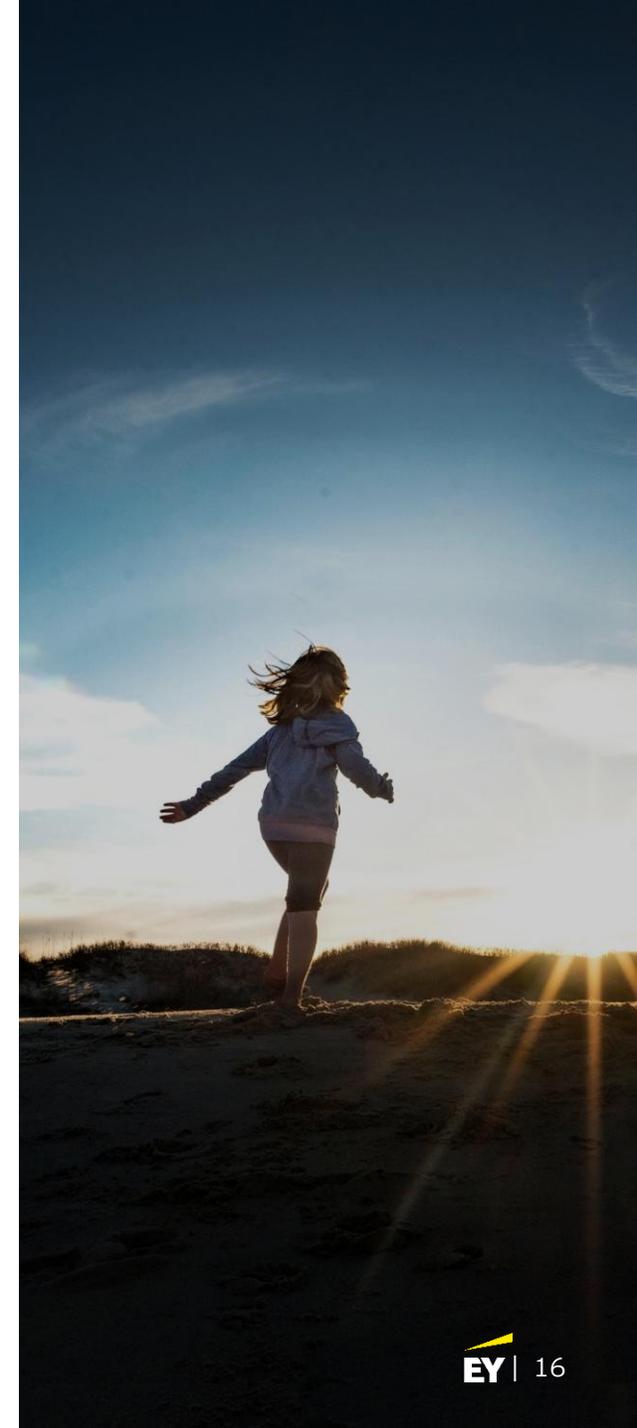
What qualifies as “*very minor*”

Incidental, low-volume, or not central to its core activities may be considered minor dealings.

Evaluating activities in business context

Apply judgment within business context

Entities should assess the scale, frequency, and relevance of the activity in the context of their overall operations when determining whether reporting is required.



Greater transparency on report review and acceptable attestation formats

Publication process clarified: PSC will publish only select information after review

- Only PDF reports and select information submitted through the online questionnaire will be published on the Public Safety Canada website following a high-level quality assurance review.
- Publication timelines cannot be guaranteed, but PSC updates the public catalogue on an ongoing basis.

Clarified acceptable signature formats: Proper attestation

- A valid signature must be wet-ink, typed, or digitally inserted by a member of the governing body. A blank signature block is not acceptable and does not meet attestation requirements.



Integrated examples to help entities meet legislative requirements

Training

Tools the organization provides to staff and suppliers to improve their practices, such as ethical recruitment templates or guidance on conducting risk assessments and understanding purchasing-practice impacts.

How the organization reviews and updates training to ensure it remains current.

Assessing effectiveness

Entities should set goals to ensure the entity makes year-over-year progress in identifying, preventing and responding to risks of forced labour and child labour, and demonstrate in their report the short, medium and long-term plans to achieve the desired goals. The questionnaire includes examples including:

- Setting up a regular review reviews or audit of the organization's policies and procedures
- Track KPIs that may show effectiveness
- Partnering with external organizations to conduct independent reviews when relevant
- Working with suppliers to measure the effectiveness of their actions

Steps to prevent and reduce risks of forced labour and child labour

- Identifying who is responsible for assessing and responding to risks and outlining the governance structure that provides senior-level oversight.
- Explaining how the organization engages with external stakeholders (e.g., industry initiatives, NGOs, trade unions, government agencies) to prevent supply chain risks.

Source:

Guidance for entities", Public Safety Canada, [Guidance for entities](https://publicsafety.gc.ca) (publicsafety.gc.ca), accessed 12 January 2026.

Submit a report, Public Safety Canada, [Submit a report](https://publicsafety.gc.ca), accessed 26 January 2026.

A top-down photograph of children playing marbles on dark, rich soil. Three hands are visible, reaching towards the marbles. The marbles are of various colors, including clear, white, and multi-colored. The scene is lit by natural light, creating a bright spot on the soil in the upper left. The overall mood is one of childhood and play.

Public Safety Canada's 2025 Report to Parliament

Public Safety Canada's 2025 Annual Report to Parliament



In the second year of implementation, Public Safety Canada focused its efforts on conducting stakeholder engagement, refining the report intake process, expanding outreach and issuing updated guidance to support reporting entities.



Subsection 24(1) requires the Minister of Public Safety to table a report to Parliament on the Act on or before September 30 of each year.



Public Safety Canada has published its second annual report to Parliament summarizing the second year of reporting using data collected through online questionnaires.

- By May 31, 2025, a total of 4,313 reports were filed.
- Of these, 40% were joint reports, up 3% from 2024.
- Public Safety Canada continued to allow late submissions after the reporting deadline (863)
- By July 31, 2024, a total of 5,176 submissions for this reporting cycle were received.



Key trends from Public Safety Canada's 2025 Annual Report to Parliament: Due diligence policies and procedures

DUE DILIGENCE

83%

of all reporting organizations
have policies and due diligence
processes in place for forced
labour and/or child labour

- 65.2% of government institutions reported having policies and due diligence processes in place related to forced labour and/or child labour.
- 84.1% of entities reported having policies and due diligence processes in place related to forced labour and/or child labour.

Key trends from Public Safety Canada's 2025 Annual Report to Parliament: Risk identification and management

RISK IDENTIFICATION

82%

of all reporting organizations had identified parts of their activities and supply chains that carried a risk of forced or child labour

Below shows the percentage of entities that identified risks in specific areas of their operations and supply chains:

- The raw materials or commodities used in its supply chains (34.1%)
- The sectors or industries it operates in (30.4%)
- Tier one (direct) suppliers (29.7%)
- The location of its activities, operations or factories (29.6%); and
- The types of products it sources (28.5%)

Due to this question in the questionnaire allowing multiple responses, the combined totals may exceed the number of respondents.

Key trends from Public Safety Canada's 2025 Annual Report to Parliament: Risk identification and management

Risk management efforts

Organizations that report, regardless of whether they have identified risks in their activities or supply chains, must describe any preventative measures they have in place, including:

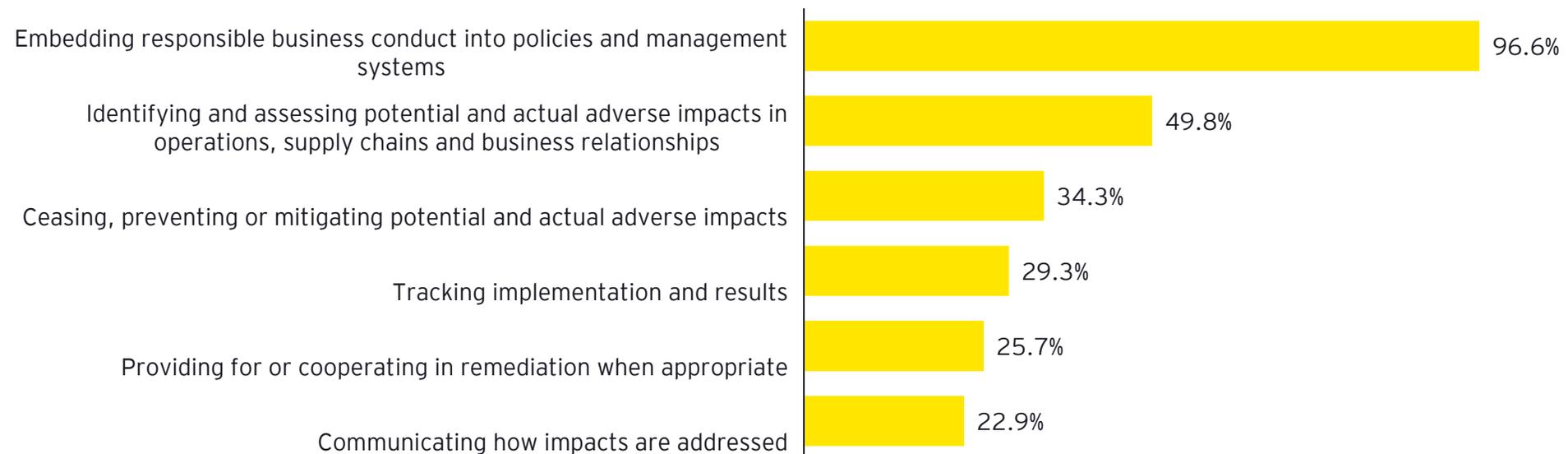


Figure 1: Steps taken by organizations to prevent and reduce the risk that forced or child labour

Key trends from Public Safety Canada's 2025 Annual Report to Parliament: Training and mandatory provisions

Mandatory Training

Organizations that indicated that they provide training on forced labour and/or child labour were asked who is offered the training and whether the training is mandatory.

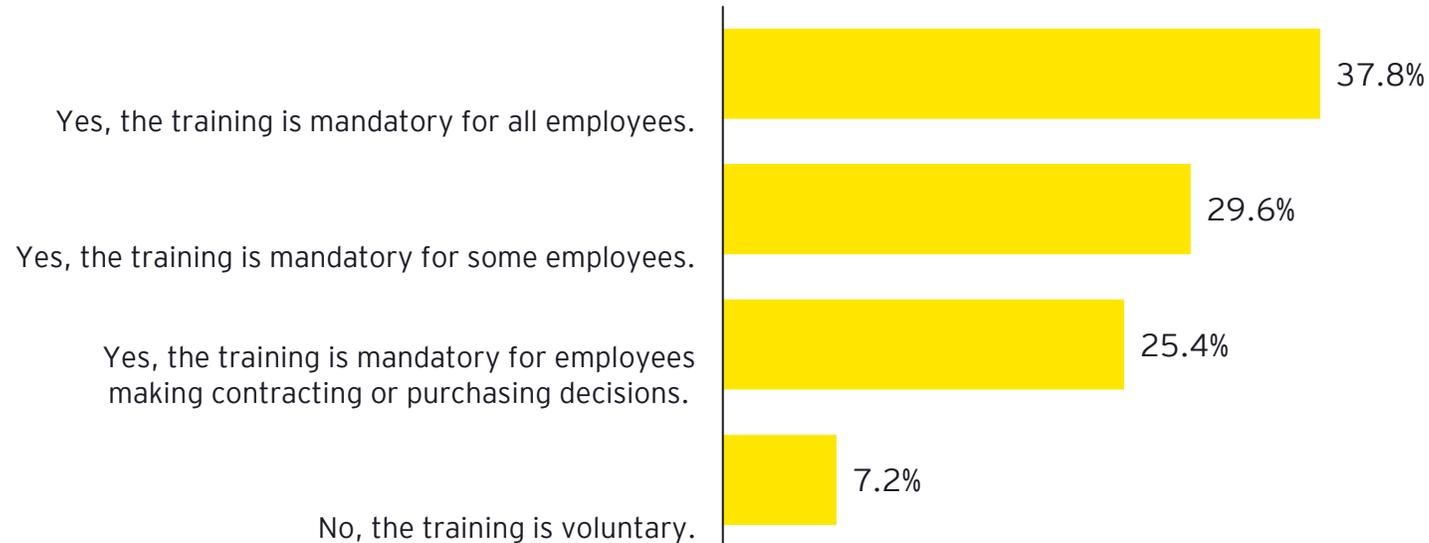


Figure 2: Percentage of organizations reporting forced labour and child labour training as mandatory (all or some employees) or voluntary

Key trends from Public Safety Canada's 2025 Annual Report to Parliament: Training and mandatory provisions

TRAINING ACTIONS

61%

of all reporting organizations
reported having training on
forced labour and child labour
for their employees

Below are the sectors in which entities had the highest proportion of respondents noting that they provide training to their employees on forced labour and child labour:

- Manufacturing (67.2%)
- Professional, scientific and technical services (66.2%)
- Finance and insurance (65.7%)
- Wholesale trade (65.0%)
- Utilities (64.9%)

Key trends from Public Safety Canada's 2025 Annual Report to Parliament: Due diligence policies and procedures

ASSESSING EFFECTIVENESS

50%

of all reporting organizations confirmed they have policies and procedures in place to assess their effectiveness in ensuring that forced labour and child labour are not being used in their activities and supply chains

The most common steps entities reported using to evaluate their approaches to addressing forced labour and child labour risks include:

- 76% are conducting regular reviews or audits of policies and procedures on forced labour and child labour.
- 37.4% are tracking indicators such as employee awareness, reported cases and the use of contractual clauses.
- 36.6% are working with suppliers to assess how effective their actions might be.
- 23.9% are using external partners to conduct independent reviews or audits.

Key trends from Public Safety Canada's 2025 Annual Report to Parliament: Remediation

REMEDIATION ACTIONS

211 entities and 3 government institutions reported taking steps to remediate forced or child labour. Below are the actions they identified:

	2025	2024	Increase of
Actions to prevent forced labour or child labour and associated harms from reoccurring	86.9%	83%	3%
Grievance mechanisms	64.5%	61.9%	2.6%
Compensation for victims of forced labour or child labour and/or their families	16.4%	15.7%	0.7%
Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support	11.2%	(not available)	-
Formal apologies	0.5%	(not available)	-

Key trends from Public Safety Canada's 2025 Annual Report to Parliament: Remediation

REMEDIATION MEASURES

When asked if they had taken any measures to remediate the loss of income to the most vulnerable families that results from any measures taken to eliminate the use of forced labour or child labour in their activities and supply chains:

- Confirmed they had taken remediation measures and will continue to identify and address any gaps (1.0%)
- Said they had not taken any remediation measures (4.1%)
- Said this question was not applicable (94.8%)

Sources:

2025 Annual Report to Parliament on the Fighting Against Forced Labour and Child Labour in Supply Chains Act accessed 13 January 2026.

2024 Annual Report to Parliament on the Fighting Against Forced Labour and Child Labour in Supply Chains Act accessed 21 January 2026.



Public Safety Canada's approach to enforcement

ENFORCEMENT

- Under the Act, the Minister has the authority to enforce compliance when reporting obligations are not met, including issuing corrective measures and penalties of up to \$250,000, underscoring the seriousness of non-compliance.
- Public Safety Canada's focus in the second reporting year remained on raising awareness and fostering transparency around forced and child labour risks.
- Notably, in 2025, no enforcement actions or charges were required, reflecting an emphasis on education and industry engagement over punitive measures.



Personal information: confirmed reports containing personal information will not be published and must be revised

1

Clear prohibition on personal information

- Entities must not include personal information (as defined in section 3 of the Privacy Act) in the questionnaire or in their annual PDF reports.
- Reports or questionnaire submissions containing personal information cannot be published in the PSC library catalogue and must be corrected and resubmitted.

2

Protecting individuals in reporting

- Descriptions of risks, issues identified, or remediation measures should not reference specific instances, groups, or identifiable cases.
- Entities must ensure reports avoid identifying any employee or external person.

3

Final checks before uploading

- Before uploading the PDF report, entities must confirm it contains no personal information.
- Any submission that includes personal information will be withheld from publication and must be resubmitted.

Examples

Examples of personal information include:

- Addresses
- Phone numbers
- Email addresses
- IP addresses
- Social insurance numbers
- Any other identifiers

Optional International Reporting Template

International Reporting on Modern Slavery, Forced Labour and Child Labour

1

optional international template

7

key areas of reporting common to all three jurisdictions

AUSTRALIA

Modern Slavery Act, 2018

UNITED KINGDOM

Modern Slavery Act, 2015

CANADA

Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2024

International Reporting on Modern Slavery, Forced Labour and Child Labour

Optional template to serve as a guide for responding to supply chain transparency requirements in the United Kingdom (UK), Australia, and Canada. It is designed to reduce the administrative burden for organisations subject to supply chain reporting requirements in the UK, Australia and Canada and supports the development of one report for all three jurisdictions.

Introduction

Human trafficking, modern slavery, child labour and forced labour are practices generally used as a way of maximising profits, by producing goods and/or providing services, often at lower costs, through the exploitation of individuals. These practices, defined differently across jurisdictions, often disregard individual rights and result in severe exploitation. The 2021 International Labour Organisation (ILO) estimates suggest that 28 million people were trapped in forced labour globally, generating \$236 billion USD in illegal profits every year.¹ At the same time, freeing people from forced labour and bringing them into formal employment could generate \$611 billion USD

¹ ILO, 2024: [Profits and poverty: The economics of forced labour](#)



International Reporting Template, Public Safety Canada

International Reporting on Modern Slavery, Forced Labour and Child Labour

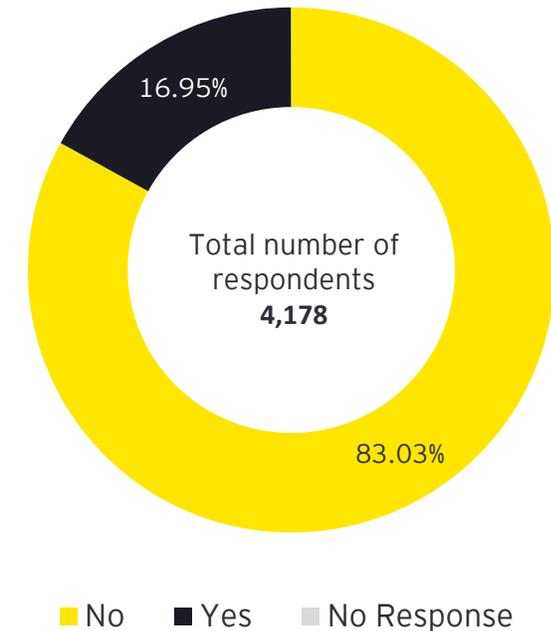
Public Safety Canada's New International Reporting Template

An optional template was designed to reduce the administrative burden for organizations subject to supply chain reporting requirements in the UK, Australia and Canada. The template enables entities to develop one report for compliance in all three jurisdictions.

16.9% of all reporting entities
were required to report in multiple jurisdictions

708 respondents subject to other legislation

- United Kingdom's Modern Slavery Act 2015 - **70.5%**
- California's Transparency in Supply Chains Act (United States) - **61.2%**
- Australia's Modern Slavery Act (2018) - **39.5%**
- Others - **29.4%**



Sources:

Public Safety Canada, 2025 Annual Report to Parliament on the Fighting Against Forced Labour and Child Labour in Supply Chains Act, 17 October 2025.

Template: International Reporting on Modern Slavery, Forced Labour and Child Labour

International Reporting on Modern Slavery, Forced Labour and Child Labour

Two Categories of Reporting Requirements - Encouraging a Continuous Improvement Approach to Compliance

Level 1

Information that **organisations should disclose** in their statements and annual reports under UK, Australian and Canadian transparency legislation.

Disclosure examples:

- A high-level profile of indirect suppliers (e.g. subcontractors).
- Describe the organizations' structure and supply chains.

Level 2 (*Recommended*)

Information that **organisations can disclose** in addition to level 1 disclosures to demonstrate progress and leadership in supply chain transparency.

Disclosure examples:

- A high-level profile of indirect suppliers (e.g. subcontractors), ideally mapping down to the lowest tier of the supply chain (e.g. raw materials).
- Provide a detailed map of the organisation's structures and relationships with suppliers and subcontractors (i.e. partnerships, contracts).
- Overview of the labour supply chain structure including how workers are recruited at different stages in the supply chains, source and transit countries of migrant workers in the supply chain, involvement of agents, brokers and other labour market intermediaries

Sources:

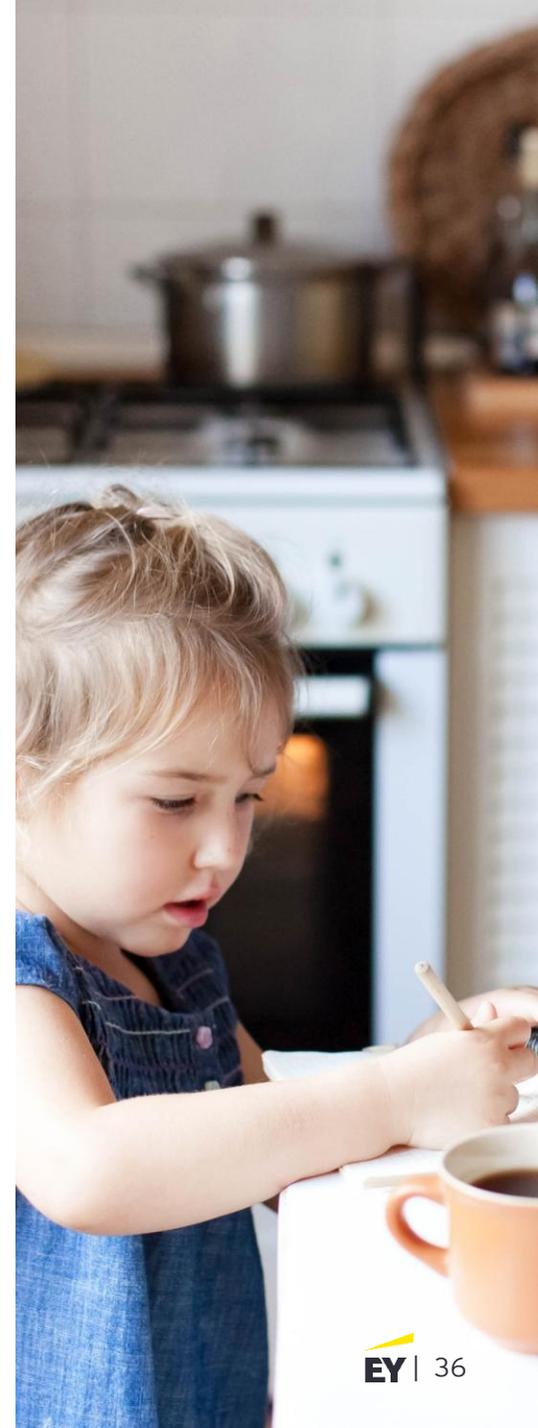
Public Safety Canada, 2025 Annual Report to Parliament on the Fighting Against Forced Labour and Child Labour in Supply Chains Act, 17 October 2025.

Template: International Reporting on Modern Slavery, Forced Labour and Child Labour

Strategies for Successful Reporting in Year 3

Recommendations for successful reporting in year 3

- 1 Confirm commitments, changes & in-scope entities:** Review prior commitments, identify any material changes in your structure/operations/supply chain, and confirm which subsidiaries are in scope.
- 2 Conduct a risk assessment:** Continue to focus on risk identification by conducting a risk assessment to identify the risks of forced labour and child labour that may exist within your operations and supply chain and engage in due diligence to mitigate identified risks.
- 3 Satisfy legislative requirements:** Collect information required to satisfy the 7 legislative requirements from internal stakeholders within the business and any covered subsidiaries.
- 4 Align on reporting maturity & begin drafting early:** Determine your organization's aspiration for reporting maturity and plans to make any forward- looking commitments. Draft your S-211 report and plan the necessary Board approval in advance of the deadline.
- 5 Leverage the international reporting template:** Use the new template to streamline compliance across Canada, the UK and Australia, ensuring consistency and completeness in reporting. Additionally, the new reporting template can be used to provide examples of continuous improvement.
- 6 Track regulatory changes in Canada and internationally:** Stay informed on Public Safety Canada's evolving guidance, proposed legislation and international regulations including the Corporate Sustainability Reporting Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CS3DD) to maintain compliance across international supply chains.



How to avoid common errors from the previous reporting periods

1

Submitting the questionnaire without a complete PDF report

Before completing the questionnaire, you must prepare a report in PDF format that meets all the requirements of the Act. Questionnaire responses are used internally by Public Safety Canada to catalogue and analyze reports. The PDF report is the public-facing product published on the Public Safety Canada website and on the entity's own website. A completed questionnaire alone won't meet the requirements of the Act.

2

Report submitted without attestation

The attestation is a mandatory requirement. Reports submitted without a statement and signature will not be published on Public Safety Canada's catalogue. Typing "signed" in the signature block does not constitute a signature.

3

Incorrect document format

Reports must be submitted in PDF format. Documents in other formats (such as Microsoft Suite Word, Excel or zip files) will not be published on the Public Safety Canada website.

4

Including personal information in a report

Your PDF report should not include personal information, except for the name(s) and title(s) of the official(s) signing the attestation. At the end of the questionnaire, you will be asked to provide the name, title and email address of the person submitting the report on your organization's behalf. Public Safety Canada may use the contact information provided should it require additional details regarding the submission.

5

Submission or report incorrectly marked "revised"

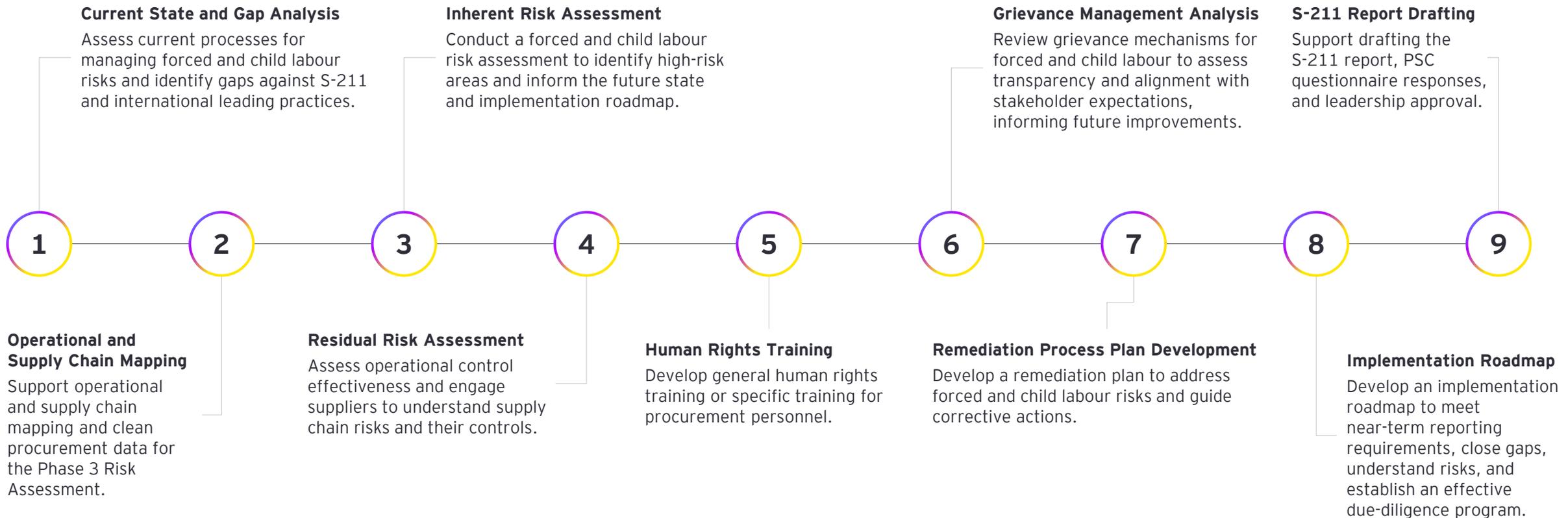
Only indicate that you are submitting a revised report if you have already submitted a report to the Minister of Public Safety for the current reporting year and are re-submitting a report with changes.



EY's Approach to Help Organizations Prepare for Reporting

EY's approach to help organizations prepare for reporting

EY's multidisciplinary team can assist you to manage forced labour and child labour risks in your operations and supply chains and prepare for annual reporting. EY's S-211 Advisory Services include a current state assessment to identify gaps, grievance management analysis, development of a remediation plan, development of a roadmap for near term compliance, advancement towards your desired future state over the medium to long term and support the S-211 report drafting. We will leverage EY's Risk Assessment Tool and Due Diligence Framework to accelerate this process as seen on the subsequent slides.



Enabler: EY's Due Diligence Framework

EY will leverage our Due Diligence Framework which is based on best practices, including the United Nations Guiding Principles on Business and Human Rights, ISO 20400 and the OECD Due Diligence Guidance for Responsible Business Conduct. The Framework comprises six stages set out below, underpinned by a total of 132 requirements categorised into minimum (86) and better practice (46) requirements. Public Safety Canada has provided additional resources to help reporting entities understand the types of actions they can take to address the human rights impacts of their business activities. The external resources provided by the government are included in EY's comprehensive framework.

EY's Due Diligence Framework

6	High level stages
133	Criteria
86	Minimum requirements
47	Leading practice requirements



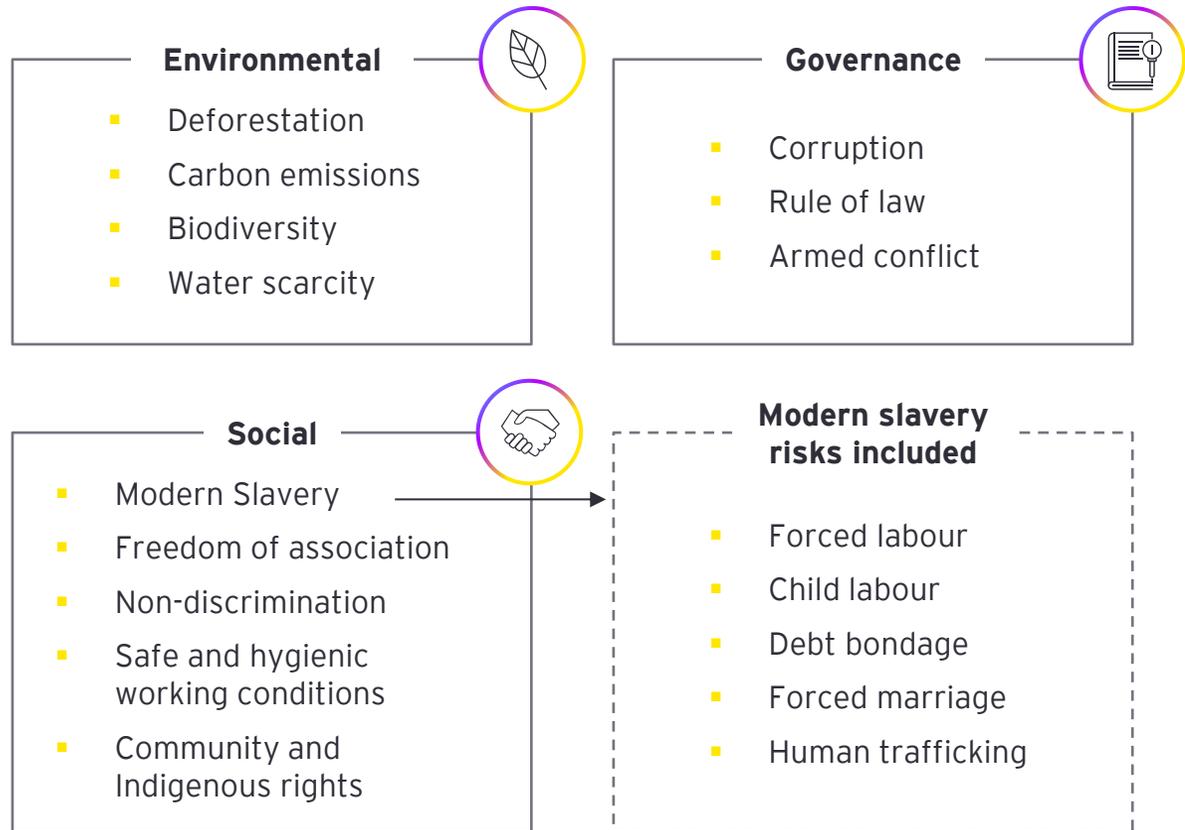
Using this approach, EY will grade each of the 132 criteria as not commenced, in progress, established or leading practice. The evaluation will look at both operations and supply chains, as it is common for organizations to have stronger controls in place in one or the other depending on the nature of the business. When assessing the clients existing approach to managing human rights, EY will consider the existence of specific criteria, the level of implementation of those criteria and the effectiveness of the measures.

The table below sets out examples of the criteria that form the detail of the EY Due Diligence Framework. When assessing the client existing approach to managing human rights, EY will consider the existence of specific criteria, the level of implementation of those criteria and the effectiveness of the measures.

Commit 	Commitment	Example criteria: There are policies and procedures in place that describe how the commitment will be implemented within the Organization.
	Policies & procedures	
	Governance	
Assess 	Scope	Example criteria: The Organizations has a clear understanding of all operational activities and supply chains to tier 1.
	Risk assessment	
Adapt 	Operational controls	Example criteria: Additional due diligence measures are in place for all high risk locations or industries.
	Risk mitigation	
Address 	Grievance mechanism	Example criteria: In cases where adverse human rights impacts have been detected, the Organization participates in fair and just remedies developed delivered in consultation with affected stakeholders.
	Risk remediation	
Track 	Monitoring / evaluation	Example criteria: The organization proactively ensures continuous improvement of human rights risks management through periodic internal monitoring of conformance with internal policies and procedures.
	Internal monitoring	
	Internal reporting	
Communicate 	Stakeholder engagement	Example criteria: A stakeholder engagement plan related to fulfillment of the Organization Commitment is developed and implemented.
	Legal compliance	
	Transparency	

Accelerator: EY's Risk Assessment Tool

EY's Risk Assessment Tool integrates multiple information sources to provide a balanced view of risk across human rights and modern slavery, as part of the overall ESG risks. This means we can deploy the EY Risk Assessment Tool to provide a consolidated assessment of risk across all ESG categories, whilst also providing a deep dive on modern slavery risks which the client is particularly concerned with in the short term.



Some of the specific categories of ESG risks included in our analysis are: the International Labour Organisation Statistics on forced labour, modern slavery and human trafficking, the Walk Free Foundation's Global Slavery Index 2018, the United Nations Population Division's Revision of World Population Prospects and UNICEF's Child Marriage data.

EY further analyses industry risks using a proprietary approach that considers known industry risk factors such as the sector use of unskilled, temporary or seasonal labour, the sector use short-term contracts and outsource labour, the sector use of foreign workers and knows sectoral use of labour or recruitment agents.

Overview of overall supplier ESG risk ratings



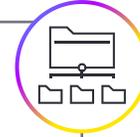
Inherent Risk Assessment Methodology

Prepare provided data for analysis

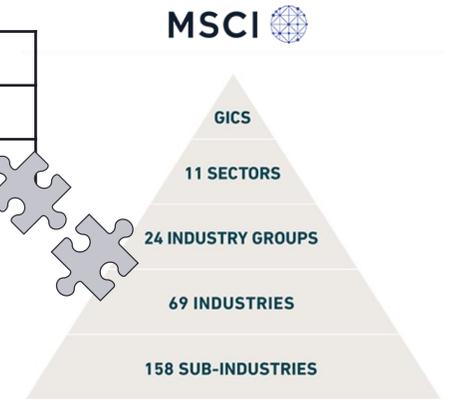
Leveraging your existing supplier data, we will map your supply chains and operations.

EY will then align all procurement categories and operational activities within scope to the **Global Industry Classification Standard (GICS) Codes**, which is an industry taxonomy developed by MSCI and Standard & Poor's for use by the global financial community.

Each category will be aligned with one of the 158 GICS Sub-Industries and, in some instances, this may require further research for suppliers who are not assigned a category or if the assigned category does not accurately reflect the supplier industry.



YOUR DATA



Identify and assess risk

Using the tool, we will be able to identify and assess the risks for your suppliers and operations by country and industry. A risk rating and score will be assigned to each of your suppliers. This information will assist you to build their risk profile for human rights risks within the supply chain. You will be able to establish a prioritized list of high-medium risk entities where you may need additional measures to manage the risk.

The outputs of the assessment are visualized in a dynamic, bespoke dashboard to enable a clear view of the risk picture across your operations. EY will present the outcomes of the human rights risk assessment in a meeting and validate it with you. The outcomes of the risk assessment outcomes will be documented in a high-level report.



Supplier inherent risk score	
High	80 - 100
Medium-high	60 - 79
Medium	40 - 59
Low-medium	20 - 39
Low	0 - 19

Residual risk assessment

Select suppliers/ operations for residual risk assessment

Using the inherent risk assessment conducted in Phase I, we will advise and agree with you on the suppliers or operational activities which should be investigated further through a residual risk assessment.

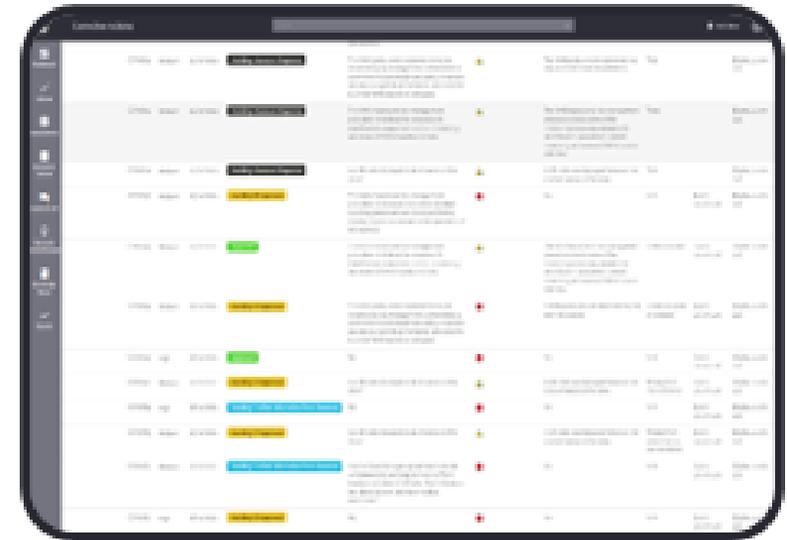
Typically, this would be all your high-risk suppliers and sometimes, a sub-set of your medium risk suppliers, depending on your scope and resources. You may also choose to include other factors as a way of prioritising your suppliers for residual risk assessment, for example, your highest value suppliers or business critical suppliers.



Deploy the ESG Risk Tool

We can use the EY Risk Tool to survey suppliers to evaluate their risk factors, controls in place to determine the level of risk management required.

The EY Risk Tool allows for monitoring of supplier action to assess if the recommendations provided are being implemented. This includes: Real time, digitalised, and centralised system that allows the supplier to close actions within the system and provides clients with the ability to monitor the status of each recommendation (e.g. awaiting response from supplier, awaiting EY approval, awaiting further information from supplier, approved). Regular reports after the engagement timeline culmination that allows the client to continue closely monitoring the completeness of the supplier action plan, for measures that are to be closed in the medium to long term.

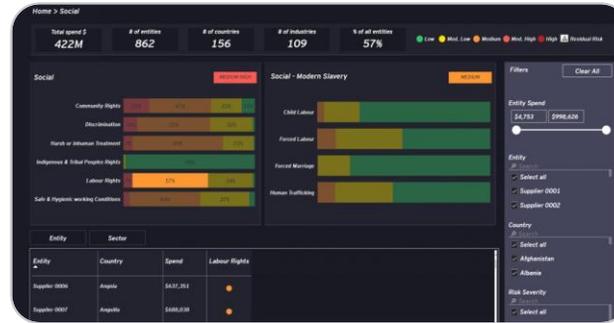


Accelerator: EY's risk assessment tool outputs

The outputs of the assessment are visualized in a dynamic, bespoke dashboard to enable a clear view of the risk picture across your operations.



Overview of overall supplier ESG risk ratings



Interactive view of risks across ESG areas and sub-areas - for targeted management plans

Entity	Country	Spend	Child Labour	Community Rights	Discrimination	Forced Labour	Forced Marriage	Harsh or Inhumane Treatment
Supplier 0001	Alghambian	\$204,901	▲	▲	▲	▲	▲	▲
Supplier 0002	Albania	\$369,198	▲	▲	▲	▲	▲	
Supplier 0003	Algeria	\$821,400	▲	▲	▲	▲	▲	
Supplier 0004	American Samoa	\$700,901	▲	▲	▲	▲	▲	
Supplier 0005	Andorra	\$499,808	▲	▲	▲	▲	▲	
Supplier 0006	Angola	\$637,351	▲	▲	▲	▲	▲	

Illustrative
One-stop view of inherent risk ratings and residual risk ratings

Q&A

A young boy is seen from behind, holding a paper airplane. The background is a warm sunset over a body of water. The text 'APPENDIX' is overlaid on the left side of the image.

APPENDIX

Deep dive into Public Safety Canada's
2025 Report to Parliament

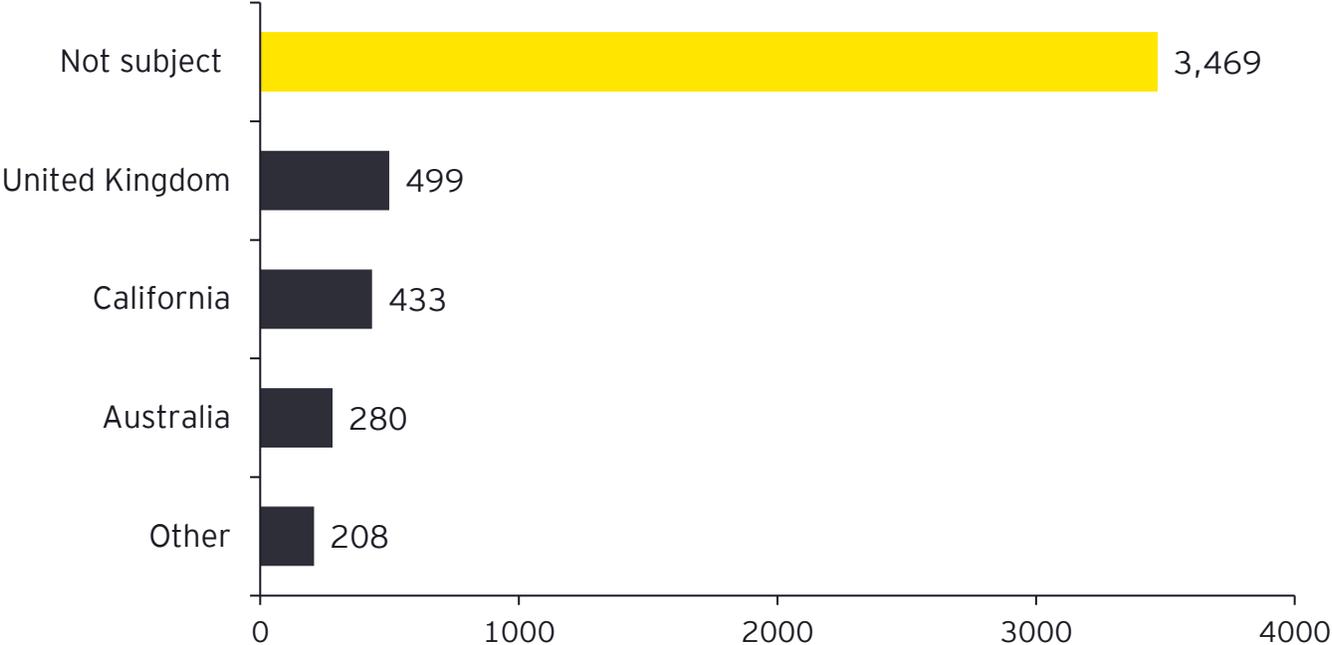
Reports by entities subject to supply chain legislation in multiple jurisdictions

- 16.9% of entities, 708 in total, were subject to reporting requirements in other jurisdictions, with the most common jurisdictions being California and the United Kingdom
 - 70.5% - report under the *United Kingdom's Modern Slavery Act*
 - 61.2% - report under *California's Transparency in Supply Chains Act*
 - 39.5% - report under *Australia's Modern Slavery Act 2018*
 - 29.4% - report under other legislation

Note: The percentages may not add up to 100% due to respondents being able to select multiple responses.

How EY can help

Report drafting

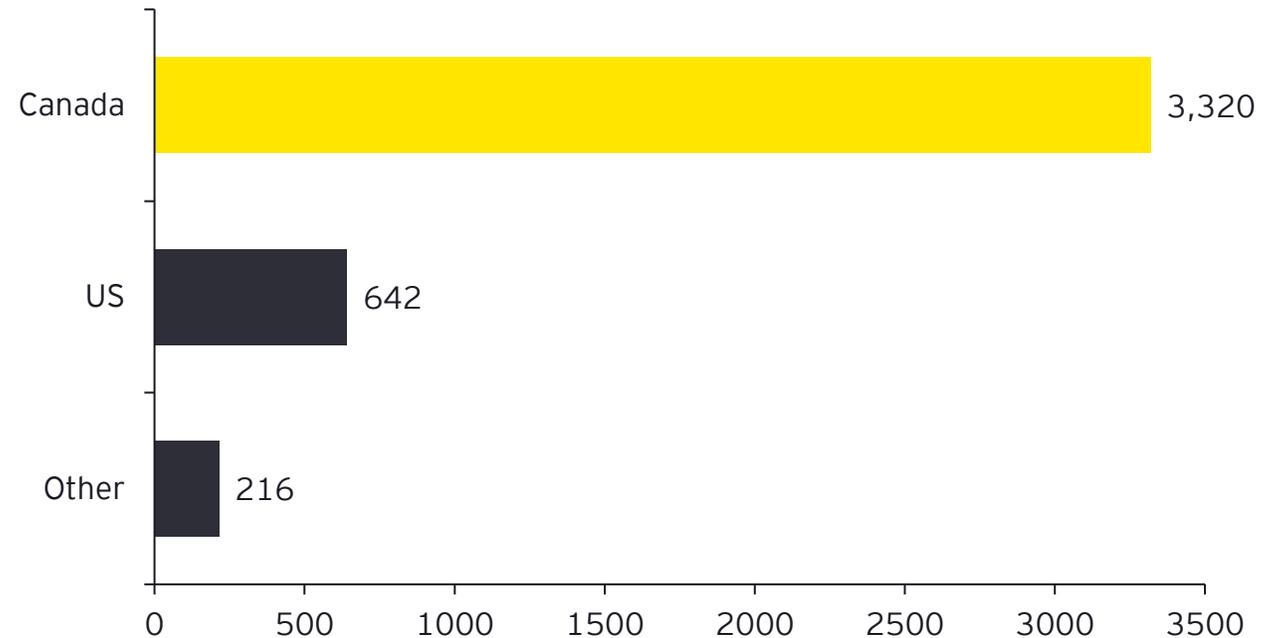


Entity location: Canada, United States and other countries

- Reports were submitted on behalf of entities based in Canada and around the world. However, the majority were based in Canada
 - **79.5%** indicated they were headquartered or principally located in Canada
 - **15.4%** indicated they were headquartered or principally located the U.S.
 - **5.2%** indicated they were headquartered or principally located in other countries

How EY can help

Report drafting

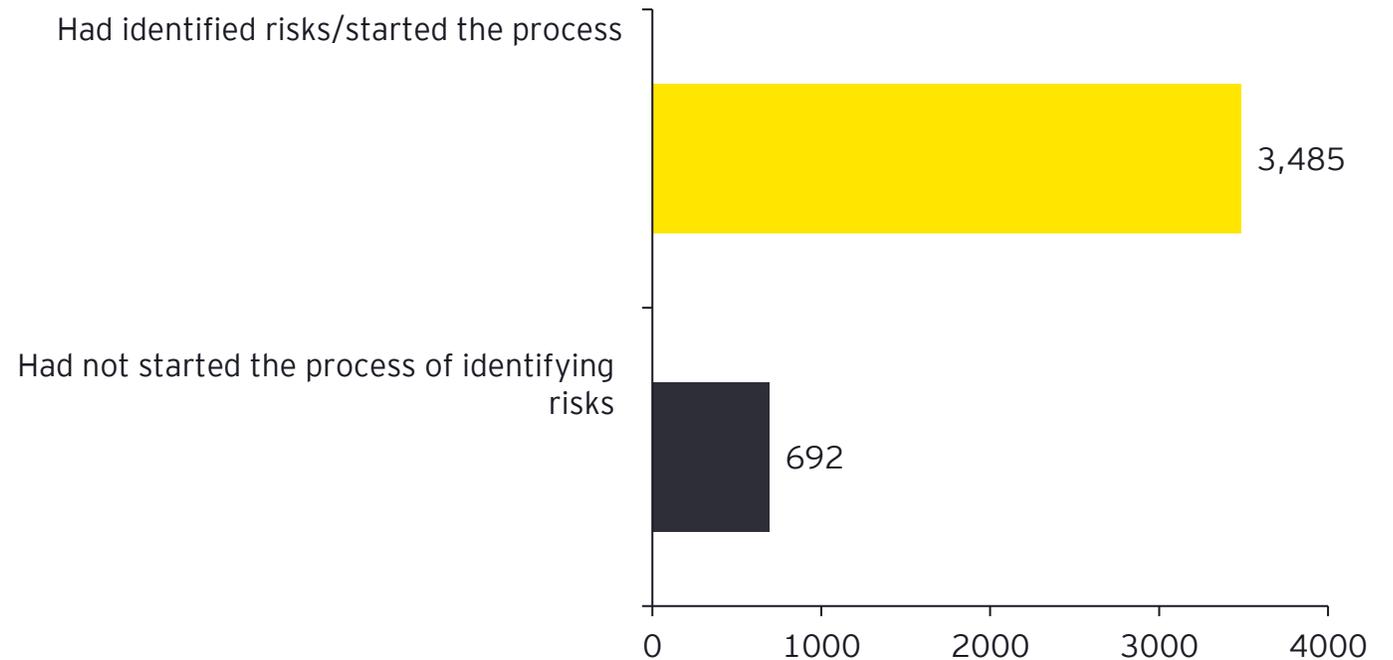


Identifying risks of forced labour and child labour in activities and supply chains

- Organizations that responded to the question of whether an organization has identified the parts of its activities and supply chains that carry a risk of forced labour or child labour being used.
 - 83.4%** of entities have identified risks or started the process of identifying risks of the parts of its activities and supply chains that carry a risk of forced labour or child labour
 - 16.6%** of entities had not started the process of identifying risks

How EY can help

Risk assessment



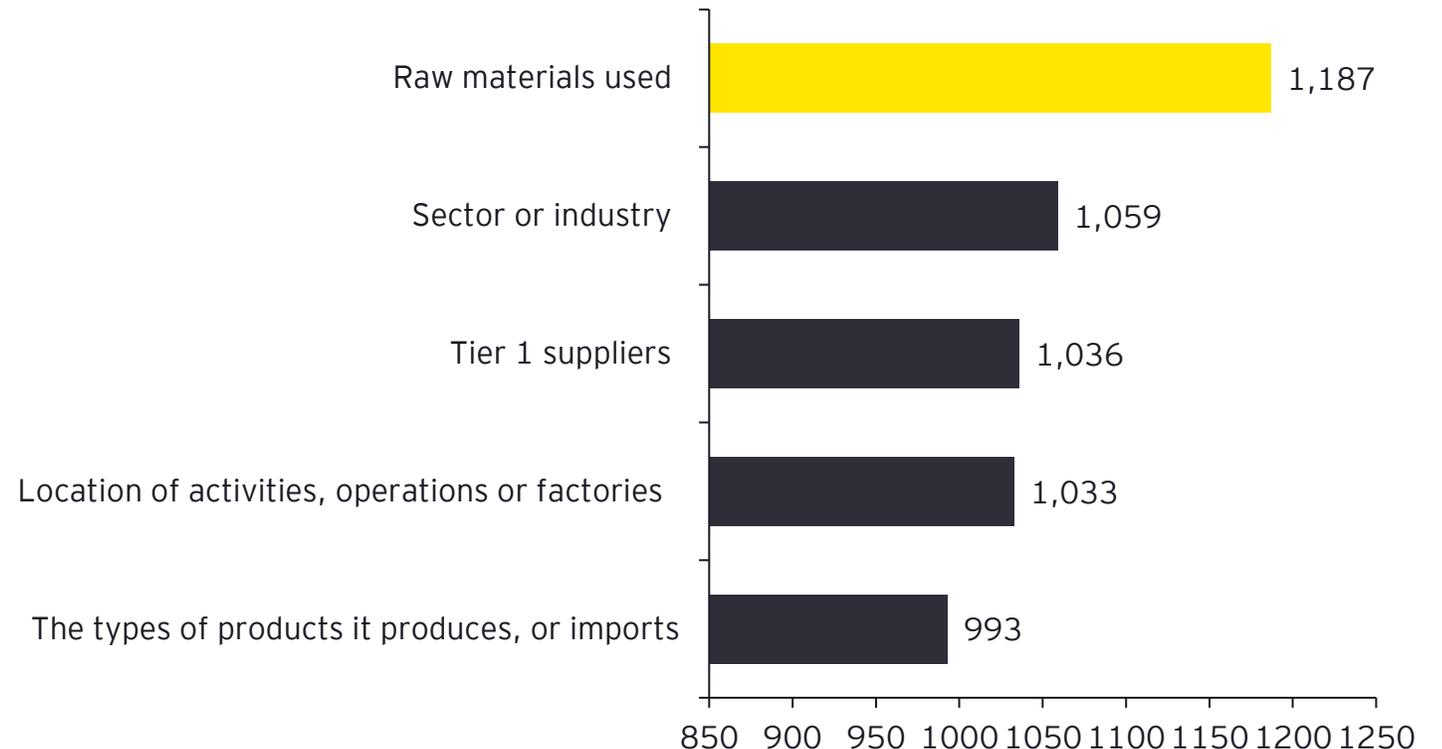
Top 5 activities and supply chains identified as being at risk

- Aspects of entities' activities and supply chains that were identified as being at risk of forced labour or child labour
 - 34.1%** identified risks in raw materials or commodities used in the entity's supply chains
 - 30.4%** identified risks in the sector or industry it operates in
 - 29.7%** identified risks in their tier 1 suppliers
 - 29.6%** identified risks due to the location of activities, operations or factories
 - 28.5%** identified the types of products sourced

Note: The percentages may not add up to 100% due to respondents being able to select multiple responses.

How EY can help

Risk assessment

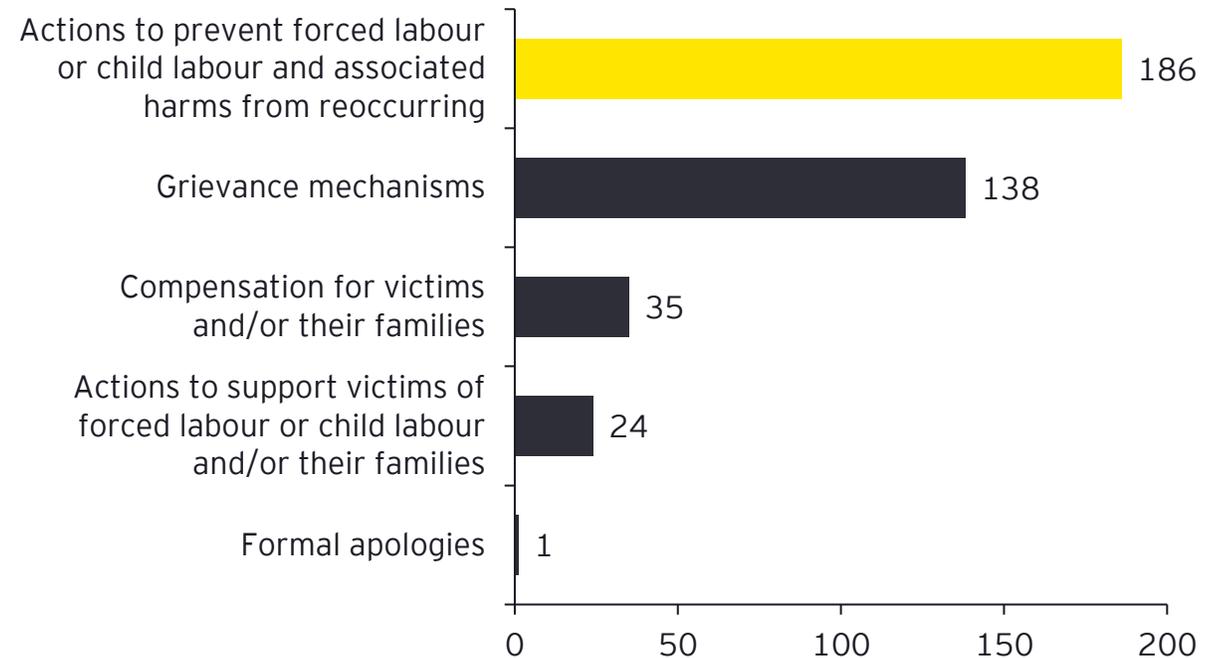


Measures taken to remediate instances of forced labour or child labour

- 5.0% of organizations indicated they have taken measures to remediate instances of forced labour or child labour (211 entities and 3 government)., those organizations identified the following specific actions:
 - 86.9%** - had taken actions to prevent forced labour or child labour and associated harms from reoccurring
 - 64.5%** - undertook grievance mechanisms
 - 16.4%** - provided compensation for victims of forced labour or child labour and/or their families
 - 11.2%** - took actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support
 - 0.5%** - gave a formal apology

How EY can help

Remediation plan development

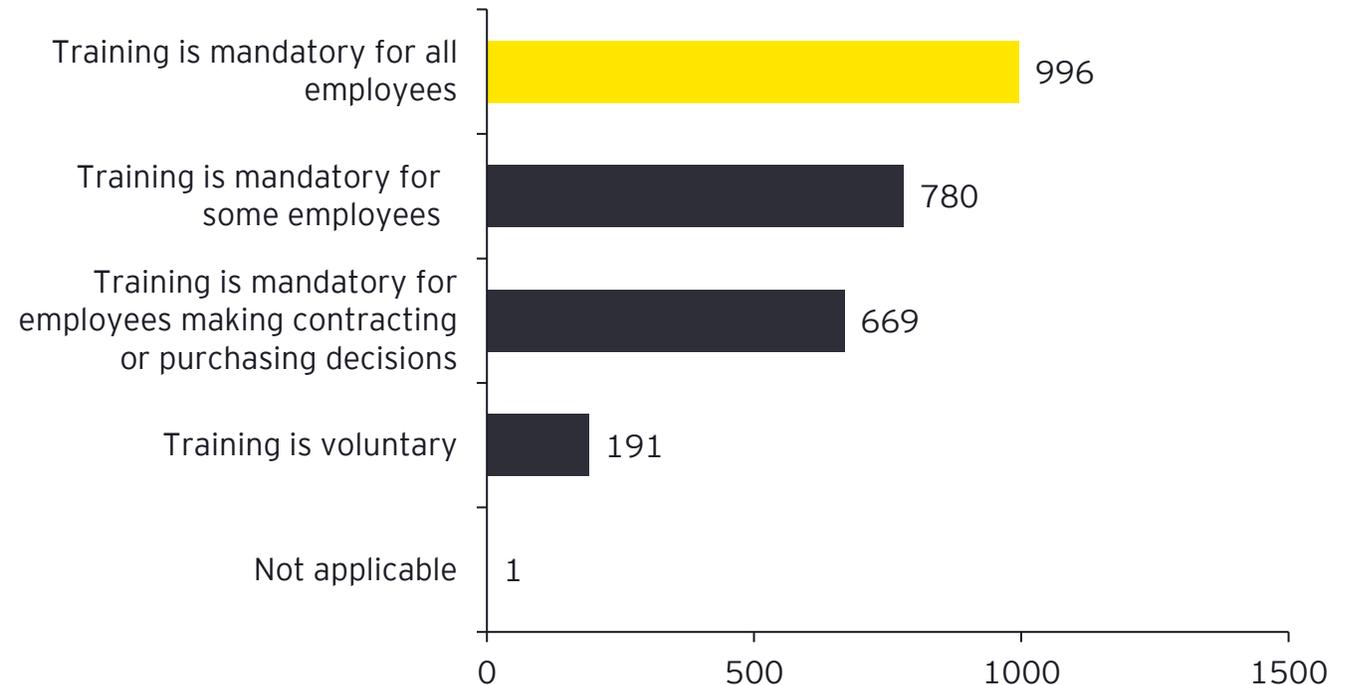


Mandatory training provided by organizations

- **61.7%** of entities provide training to their employees on forced labour or child labour, of these:
 - **37.8%** indicated the training was mandatory for all employees
 - **29.6%** indicated the training was mandatory for some employees
 - **25.4%** indicated the training was mandatory for employees making contracting or purchasing decisions
 - **7.2%** indicated that the training was voluntary

How EY can help

Training development

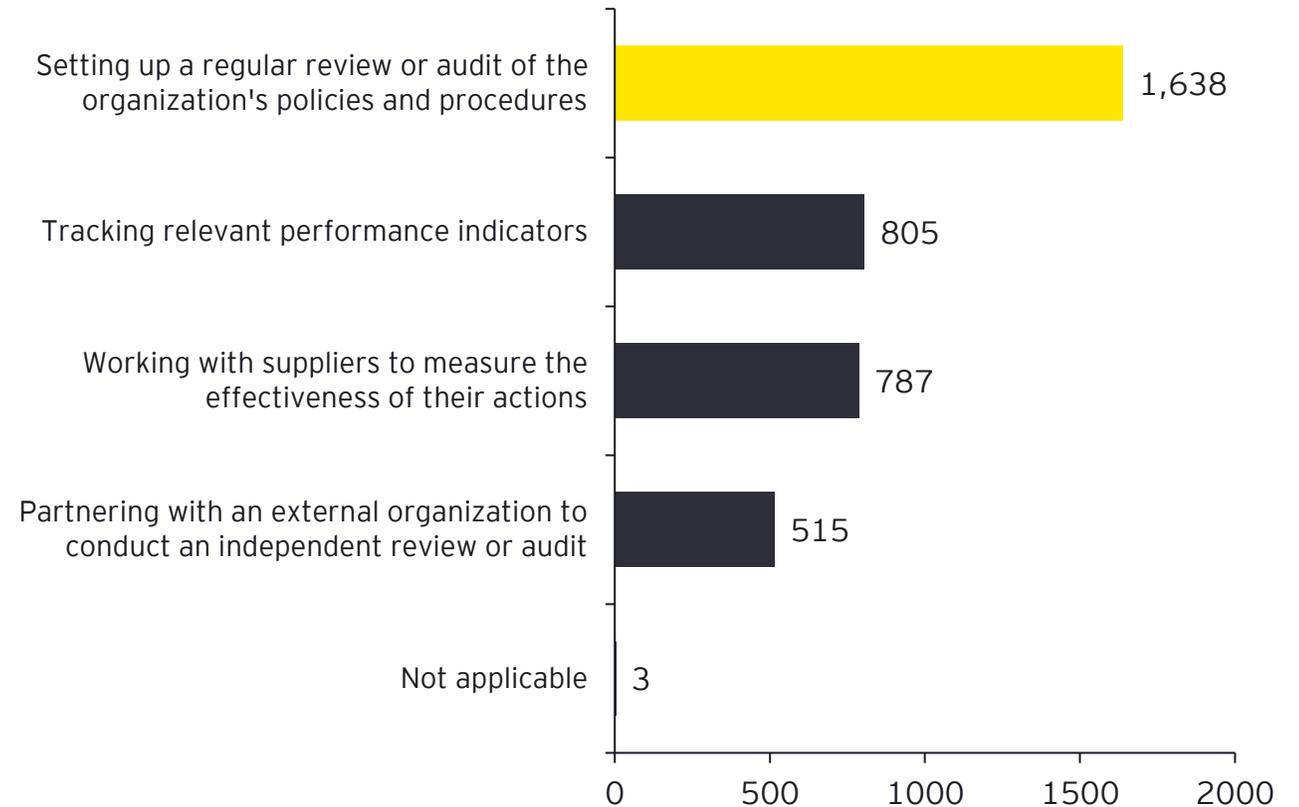


Assessing effectiveness in preventing the use of forced labour and child labour

- 51.2% of entities have policies and procedures in place to assess their effectiveness in ensuring that forced labour and child labour are not being used in their activities and supply chains, of these
 - 75.9% - Setting up a regular review or audit of the organization's policies and procedures
 - 37.3% - Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti forced labour and anti child labour clauses
 - 36.5% - Working with suppliers to measure the effectiveness of their actions
 - 23.9% - Partnering with an external organization to conduct an independent review or audit of the organization's actions

How EY can help

Gap Analysis



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