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## Compliance Checklist: Canada's Modern Slavery Act

**Purpose:** This checklist assists entities in preparing a disclosure report that aligns with the **Fighting Against Forced Labour and Child Labour in Supply Chains Act**, effective January 1, 2024.

**Deadline:** Annual reports must be submitted **on or before May 31** each year.

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## 1. Determine Applicability

- **Entity Status:** Confirm if your organization qualifies as an “entity” under the Act:
- **Listed on a Canadian stock exchange, or**
- **Has a place of business in Canada, does business in Canada, or has assets in Canada** and meets **two** of the following conditions:
  - At least **\$20 million in assets**,
  - At least **\$40 million in revenue**,
  - An average of at least **250 employees**.
- **Business Activities:** Assess if your organization is involved in:
  - **Producing, selling, or distributing goods** in Canada,
  - **Importing goods** into Canada,
  - **Controlling an entity** engaged in the above activities.

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## 2. Understand Reporting Obligations

**Annual Reporting:** Prepare a report detailing steps taken during the previous financial year to **prevent and reduce the risk** of forced labour and child labour in:

- **Your operations,**
- **Your supply chains.**



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### 3. Develop Your Disclosure Statement

Your disclosure should comprehensively address the following areas:

#### a. Structure, Activities, and Supply Chains

- **Organizational Overview:** Provide a clear description of your organization's structure and operations.
- **Supply Chain Details:** Outline the nature and complexity of your supply chains, highlighting areas with potential risks of forced or child labour.

#### b. Policies and Due Diligence Processes

- **Policy Framework:** Detail policies related to forced labour and child labour.
- **Due Diligence Measures:** Describe processes implemented to identify, assess, and mitigate risks within your operations and supply chains.

#### c. Risk Assessment and Management

- **Risk Identification:** Pinpoint parts of your business and supply chains at risk of involving forced or child labour.
- **Mitigation Strategies:** Explain steps taken to assess and manage these risks effectively.



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### 3. Develop Your Disclosure Statement (con't)

#### d. Remediation Measures

- **Corrective Actions:** Detail actions taken to remediate any instances of forced or child labour identified.
- **Income Support:** Explain measures to address the loss of income for vulnerable families resulting from eliminating forced or child labour.

#### e. Training

- **Employee Education:** Provide information on training programs for employees regarding forced and child labour, including:
- **Mandatory vs. Optional Training:** Specify whether the training is compulsory.
- **Scope:** Indicate if the training is entity-wide or targeted at specific roles.
- **Content:** Outline the topics covered, ensuring both forced labour and child labour are addressed.

#### f. Assessing Effectiveness

- **Evaluation Methods:** Explain how your organization assesses the effectiveness of measures taken to ensure forced and child labour are not present in your operations and supply chains, such as:
- **Regular Audits:** Conducting periodic reviews of policies and procedures.
- **Performance Indicators:** Tracking metrics like employee awareness levels and the number of reported incidents.
- **Independent Reviews:** Partnering with external organizations for objective assessments.



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## 4. Report Approval and Submission



- **Governing Body Approval:** Ensure the report is **approved by your organization's governing body** (e.g., Board of Directors).



- **Submission:** Submit the report to the **Minister of Public Safety** on or before **May 31** each year.



- **Public Accessibility:** Make the report **publicly available**, such as publishing it prominently on your organization's website.

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## 5. Seek Professional Assistance

Navigating the complexities of compliance with the **Fighting Against Forced Labour and Child Labour in Supply Chains Act** can be challenging. **InterPraxis** specializes in ethical supply chain consulting and can assist your organization in:

- **Drafting Comprehensive Disclosure Statements:** Ensuring all legislative requirements are met with clarity and precision.
- **Policy Development:** Crafting policies that address forced and child labour risks effectively.
- **Risk Assessments:** Conducting thorough evaluations to identify and mitigate potential vulnerabilities.
- **Training Programs:** Developing and delivering tailored training to enhance employee awareness and compliance.

For personalized guidance and support, contact **InterPraxis** at [info@interpraxis.com](mailto:info@interpraxis.com)

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