

2023 Modern Slavery Act Report

Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023

Identifying information

This report is submitted by Saskatchewan Abilities Council Inc. (operating as SaskAbilities), a single entity, as required in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, also known as the Modern Slavery Act (the "Act"). The period to which this report relates commenced on January 1, 2023 and ended on December 31, 2023. This is not a revised version of a previously-submitted report.

SaskAbilities' vision is to work together to build inclusive communities for people of all abilities. Our mission is to support people experiencing disability with programs and services to enhance their lives. Our values are: (1) We treat people with respect, honesty and compassion; (2) Our programs and services are client-centred, goal-oriented and accountable; and (3) We value teamwork, excellence and innovation.

Policy Statement with respect to human rights

SaskAbilities fully supports the objectives of the Act and opposes the use of all forms of forced labour and child labour, including in our operations and our supply chains. Respect for human rights is fundamental to our values and to the well-being of the communities in which we operate.

As set out in the United Nations Guiding Principles on Business and Human Rights ("**UNGPs**"), business enterprises have a responsibility to respect internationally recognized human rights. The responsibility to respect human rights requires that business enterprises: (a) Avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur; and (b) Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products, or services by their business relationships, even if they have not contributed to those impacts.

In 2024, we will begin to assess the potential for our operations to cause, contribute to, or be directly linked to adverse human rights impacts, including forced labour and child labour. Currently, we are of the view that there is low risk that our operations have caused or contributed to adverse human rights impacts.

SaskAbilities is headquartered in Saskatoon, Saskatchewan. We acknowledge that we are on Treaty 6 Territory and the Homeland of the Métis people.

Steps taken to prevent and reduce risk of forced and child labour

What steps have been taken to prevent and reduce the risk that forced labour and/or child labour is used at any step in the production of goods? – Section 11(1)

SaskAbilities has not begun to undertake activities in relation to the Act; however, SaskAbilities fully supports the objectives of the Act and opposes the use of all forms of forced labour and child labour, including in our operations and our supply chains. Respect for human rights is fundamental to our values and to the well-being of the communities in which we operate.

In 2024, SaskAbilities will begin to take steps to promote the objectives of the Act and is considering implementing actions to achieve that goal that may include:

- Monitoring employee recruitment for indications of forced and child labour
- Gathering information, including conducting an internal assessment of risks of forced labour and/or child labour in our organization's activities and supply chains
- Developing relevant policies and procedures, including due diligence polices and process for identifying, addressing and prohibiting the use of forced labour and/or child labour in SaskAbilities activities and supply chains
- Updating existing relevant policies and procedures
- Creating a supplier code of conduct
- Affirming suppliers' commitment to code of conduct
- Educating employees about the Act, identifying instances of forced/child labour in operations and supply chains, and ethical practices
- Determining ways that SaskAbilities can remediate forced/child labour in operations and supply chains
- Forming a Modern Slavery Act committee of employees to begin to undertake the above commitments in 2024.

Structure, activities, supply chains

Structure of SaskAbilities – Section 11 (3)(a)

SaskAbilities is a registered charity that operates under the authority of *The Non-profit Corporations Act*, 2022, of Saskatchewan. It is dedicated to providing programs and services to individuals experiencing disability in Saskatchewan and serves people of all ages and abilities. Operating as a single entity, SaskAbilities has assets over \$20 million and employs about 450 individuals across Saskatchewan.

Activities involving supply chains – Section 11 (3)(a)

In delivering its mission and realizing its vision, SaskAbilities operates business and training centres that provide manufacturing in sewing, wood products, metalwork, and commercial/industrial assembly fields. A range of products provide work experience and training for individuals in real-work settings and provide revenue to assist with program and service delivery. Products include custom crating, stakes, lath, manufacturing of coveralls, veterinary linens, ringette equipment and clothing, real estate signs, bulk mail services, packaging and sorting of high-volume materials. Products are mostly sold within the province of Saskatchewan and within Canada; however, some wood materials are shipped to the United States and Europe.

In addition to business and training centres, SaskAbilities manufactures and customizes Orthopaedic products and also distributes a variety of assistive devices and equipment to individuals throughout the province of Saskatchewan. Products and equipment include prosthetic devices, braces, splints, customized foot products, specialized wheelchair seating, wheelchairs, walkers, tub transfer devices, commodes, safety poles, and customized pediatric wooden equipment. Orthopaedic products and assistive devices and equipment are sold and/or distributed in Saskatchewan only.

Approximate sales and distribution volume is \$15 million.

Supply chains – Section 11 (3)(a)

SaskAbilities uses supply chains to:

- Provide raw materials for products and materials that are manufactured, sold, and/or distributed by SaskAbilities
- Provide finished goods or nearly-finished goods for customization, sale and/or distribution
- Provide finished goods for re-sale and/or distribution.

Most supply chains are located within Canada; however, some raw materials, finished, or nearly-finished goods are sourced from the United States, China, Mexico, and Europe.

Approximate supply chain volume is \$9 million.

Policies and due diligence processes

What policies and due diligence processes are in place related to forced and/or child labour? – Section 11(3)(b)

Currently, SaskAbilities does not have any policies or due diligence in place specifically related to forced and or child labour. However, SaskAbilities is committed to monitoring and reducing the risks of forced and/or child labour in its operations and supply chains. SaskAbilities intends to form a committee of employees in 2024 to consider how to develop or amend appropriate policies, procedures, and codes of conduct to promote the objectives of the Act. It is expected that the committee may also consider creating content or materials to educate employees regarding identifying and remediating forced and/or child labour in operations and supply chains.

Activities and supply chains that carry risk of forced and child labour

Has the organization identified activities and supply chains that carry a risk of forced and/or child labour being used? – Section 11 (3)(c)

SaskAbilties has not identified activities and supply chains that carry a risk of forced and/or child labour being use; however, SaskAbilities anticipates taking steps to begin assessing the process of identification as discussed above.

Measures to remediate forced or child labour

Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains? – Section 11(3)(d)

SaskAbilities has not identified any forced or child labour in its activities or supply chains and, therefore, has not taken any measures to remediate.

Measures to remediate loss of income to vulnerable families

Has the organization 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 its activities and supply chains? – Section 11(3)(e)

Having not identified any forced or child labour in its activities or supply chains, SaskAbilities has also not identified any loss of income to vulnerable families resulting from measures taken, as no measures were taken.

Training for employees on forced and/child labour

Does the organization currently provide training to employees on forced labour and/or child labour? – Section 11(3)(f)

SaskAbilities does not currently provide training to employees on forced and/or child labour. In 2024, SaskAbilities' Modern Slavery Act committee will consider developing or amending content for training employees so that it will be able to provide education to employees about the Act, ways of identifying instances of forced and/or child labour in operations and supply chains, the important role they play in mitigating the use of forced and/or child labour, and ethical practices.

Assessing effectiveness

Does the organization currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and/or child labour are not being used in its activities and supply chains? – Section 11(3)(g)

SaskAbilities has not taken steps to assess its effectiveness in ensuring that forced labour and/or child labour are not being used in its activities and supply chains. We anticipate developing policies and procedures in 2024 and if such development is completed on time, a description may be included in SaskAbilities' next Modern Slavery Act report.

Approval and attestation

Approval of the annual Modern Slavery Act report by the governing body of SaskAbilities' – Section 11(4)(a).

At the May 15, 2024 meeting of the Board of Directors of SaskAbilities, the following motion was unanimously passed:

That, in accordance with Section 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, the Board of Directors reviewed and approved SaskAbilities' Modern Slavery Act report prepared for the period January 1, 2023 to December 31, 2023.

An attestation shall be signed by a member of the governing body of SaskAbilities – Section 11(5)(a)(b).

At the May 15, 2024 meeting of the Board of Directors of SaskAbilities, the following motion was unanimously passed:

That, in accordance with Section 11(5)(a)(b) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, the Board of Directors authorizes the President of the Board to execute and deliver the attestation regarding SaskAbilities' Modern Slavery Act report prepared for the period January 1, 2023 to December 31, 2023.

Attestation

I attest, on behalf of the Board of Directors of Saskatchewan Abilities Council Inc., that the Board of Directors reviewed the information contained in its Modern Slavery Act report prepared for the period January 1, 2023 to December 31, 2023; that the Board of Directors exercised reasonable diligence in reviewing the report; and that the information contained in the report is true, accurate, and complete.

This report is prepared pursuant to the criteria for a single entity and is approved by:

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Andy Livingston President of the Board of Directors Saskatchewan Abilities Council Inc. May 15, 2024