

# Canada Bill S-211 Questionnaire Checklist/ FRDM Capabilities

OVERVIEW

On December 20, 2023, Public Safety Canada launched its new website providing guidance on implementing the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("Supply Chains Act") or Bill S-211, which takes effect January 1, 2024. The website introduces a detailed questionnaire for submitting required reports, adding complexity to compliance. Companies should carefully review the guidance and questionnaire well before filing reports to ensure their approach aligns with Public Safety Canada's expectations for the Supply Chains Act.

## Who Needs To Report?

The Act defines an entity as a corporation, trust, partnership, or other unincorporated organization that is either:

- Listed on a Canadian stock exchange, or
- Has a place of business, does business, or holds assets in Canada and, based on its consolidated financial statements, meets at least two of the following conditions for one of its two most recent financial years:
  - Has at least \$20 million in assets
  - Has generated at least \$40 million in revenue
  - Employs an average of at least 250 employees

## Questionnaire Answers x FRDM Capabilities: **95%**

**69.51%**

of questions  
completely  
addressed by  
FRDM app

**12%**

of questions  
supported by  
FRDM app

**14%**

of questions  
supported by  
FRDM+ services

QUESTIONNAIRE QUESTIONS

**What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply.**

	FRDM PRIMARY	FRDM SUPPORTS	FRDM+ SERVICES	CUSTOMER	3 <sup>RD</sup> PARTY REQUIRED	EXPLANATION
Mapping Activities	✓					Trading Partners, Genomes, Sanctions/High Risks Module
Mapping Supply Chains	✓					Trading Partners, Genomes, Sanctions/High Risks Module
Conducting an internal assessment of risks of forced labour and/or child labour in the organizations activities and supply chains	✓					Supplier Risk Profiles, Alerts, Trading Partners, Sanctions/High Risks Module
Contracting an external assesement of risk of forced labor and/or child labour in the organization's activities and supply chains	✓					Supplier Link, Certifications, Human Rights Assessment, Fair Labor Assessment
Developing and implementing an action plan for addressing forced labour and/or child labour		✓	✓	✓		Customer Assessment, FRDM Services: reporting
Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily	✓					Supplier Link, Certifications, Human Rights Assessment, Fair Labor Assessment
Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour	✓		✓			Entire App, Organizational Assessment
Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organizations activities and supply chains		✓	✓	✓		Entire App, Organizational Assessment, FRDM+ Services: quarterly reports
Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour	✓		✓			Filtering, Additional support from FRDM+ Services to develop plan
Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains	✓			✓		Supplier Link, Human Rights Assessment, Fair Labor Assessment
Developing and implementing child protection policies and processes		✓		✓		Supplier Link, Human Rights Assessment, Fair Labor Assessment, Supplier onboarding via FRDM Supplier Link - signing customer code of conduct
Developing and implementing anti-forced labor and/or child labour contractual clauses		✓	✓	✓		Duty is on customer. FRDM can advise only,
Developing and implementing anti-forced labor and/or child labour standards, codes of conduct, and/or compliance checklists		✓		✓		Supplier Link, Human Rights Assessment, Fair Labor Assessment
Auditing Suppliers					✓	Requires third-party social audit firm. FRDM can advise on vendors.
Monitoring Suppliers	✓					Entire app
Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour		✓		✓		FRDM donation to MIAFW, Advisement on NGOs
Developing and implementing grievance mechanisms			✓	✓		Can advise on third parties

QUESTIONNAIRE QUESTIONS	FRDM PRIMARY	FRDM SUPPORTS	FRDM+ SERVICES	CUSTOMER	3 <sup>RD</sup> PARTY REQUIRED	EXPLANATION
Developing and implementing training and awareness materials on forced and/or child labor	✓					FRDM Employee Training Webinar/In Person Event, Cloud based training
Engaging with supply chain partners on the issue of addressing forced labour and/or child labour	✓					FRDM Webinars
Engaging with civil society groups, experts, and other stakeholders on the issue of forced labour and/or child labour			✓			FRDM Webinars
Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks			✓		✓	Case by case basis
Other, please specify	✓		✓			Supplier training, Sanctions checks

**Does the organization currently have policies and due diligence processes in place related to forced labour and/or child labour?**

Yes

*\*If yes, which of the following elements of the due diligence process has the organization implemented in relation to forced labour and/or child labour? Select all that apply.*

Embedding responsible business conduct into policies and management systems		✓	✓	✓		Supplier Link: Human Rights Assessment, Organization Supplier Code Of Conduct
Identifying and assessing adverse impacts in operations, supply chains and business relationships	✓					FRDM App
Ceasing, preventing or mitigating adverse impacts		✓		✓		FRDM Identification of FL/CL -> Organization Remediation Process
Tracking implementation and results	✓					FRDM App
Communicating how impacts are addressed	✓					Activity Module, Reporting
Providing for or cooperating in remediation when appropriate		✓		✓		Supplier Link Activities Directed By Customer

**Has the organization identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

**Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.**

Yes

**Yes, we have started the process of identifying risks, but there are still gaps in our assessments.**

Yes

**No, we have not started the process of identifying risks.**

NA

*\*If yes, has the organization identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.*

The sector or industry it operates in	✓					Industry Risk Analysis
The types of products it produces, sells, distributes or imports	✓					Product/Commodity Risk Analysis / Product Genomes

QUESTIONNAIRE QUESTIONS	FRDM PRIMARY	FRDM SUPPORTS	FRDM+ SERVICES	CUSTOMER	3 <sup>RD</sup> PARTY REQUIRED	EXPLANATION
The locations of its activities, operations or factories	✓					Geo Risk Analysis, Alerts Module
The types of products it sources	✓					Product/Commodity Risk Analysis / Product Genome Module
The raw materials or commodities used in its supply chains	✓					Product/Commodity Risk Analysis / Product Genome Module
Tier one (direct) suppliers	✓					Supplier Risk Analysis, Supplier Link: Human Rights Assessment, Fair Labour Assessment, Alerts Module, Sanctions/High Risk Module
Tier two suppliers	✓					Trading Partners Module, Sanctions/High Risk Module
Tier three suppliers	✓					Trading Partners Module, Sanctions/High Risk Module
Suppliers further down the supply chain than tier three	✓					Trading Partners Module, Sanctions/High Risk Module
The use of outsourced, contracted or subcontracted labour	✓					Supplier Risk Analysis, Supplier Link: Human Rights Assessment, Fair Labour Assessment
The use of migrant labour	✓					Supplier Risk Analysis, Supplier Link: Human Rights Assessment, Fair Labour Assessment
The use of forced labour	✓					FRDM App
The use of child labour	✓					FRDM App
None of the above				<b>Not Applicable</b>		
Other, please specify:	✓					Xinjiang sub-suppliers checks via Sanctions/High risk Module

**Has the organization identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply.**

Agriculture, forestry, fishing and hunting	✓					Industry Module, Industry Reporting, Product Genome Module
Mining, quarrying, and oil and gas extraction	✓					Industry Module, Industry Reporting, Product Genome Module
Utilities	✓					Industry Module, Industry Reporting, Product Genome Module
Construction	✓					Industry Module, Industry Reporting, Product Genome Module
Manufacturing	✓					Industry Module, Industry Reporting, Product Genome Module
Wholesale trade	✓					Industry Module, Industry Reporting, Product Genome Module

QUESTIONNAIRE QUESTIONS	FRDM PRIMARY	FRDM SUPPORTS	FRDM+ SERVICES	CUSTOMER	3 <sup>RD</sup> PARTY REQUIRED	EXPLANATION
Retail trade	✓					Industry Module, Industry Reporting, Product Genome Module
Transportation and warehousing	✓					Industry Module, Industry Reporting, Product Genome Module
Information and cultural industries	✓					Industry Module, Industry Reporting, Product Genome Module
Finance and insurance	✓					Industry Module, Industry Reporting, Product Genome Module
Real estate and rental and leasing	✓					Industry Module, Industry Reporting, Product Genome Module
Professional, scientific and technical services	✓					Industry Module, Industry Reporting, Product Genome Module
Management of companies and enterprises	✓					Industry Module, Industry Reporting, Product Genome Module
Administrative and support, waste management and remediation services	✓					Industry Module, Industry Reporting, Product Genome Module
Educational services	✓					Industry Module, Industry Reporting, Product Genome Module
Health care and social assistance	✓					Industry Module, Industry Reporting, Product Genome Module
Arts, entertainment and recreation	✓					Industry Module, Industry Reporting, Product Genome Module
Accommodation and food services	✓					Industry Module, Industry Reporting, Product Genome Module
Other services (except public administration)	✓					Industry Module, Industry Reporting, Product Genome Module
Public administration	✓					Industry Module, Industry Reporting, Product Genome Module
<b>Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains?</b>						
Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.	✓					
Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.	✓					
No, we have not taken any remediation measures.						<b>Not Applicable</b>
Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.	✓					

QUESTIONNAIRE QUESTIONS	FRDM PRIMARY	FRDM SUPPORTS	FRDM+ SERVICES	CUSTOMER	3 <sup>RD</sup> PARTY REQUIRED	EXPLANATION
<b>If yes, which remediation measures has the organization taken?</b>						
Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support			✓	✓		FRDM can assist with guidance identifying NGO's working on the issue
Compensation for victims of forced labour or child labour and/or their families				✓	✓	Supplier Link, Engage suppliers with remediation requirements and documentation
Actions to prevent forced labour or child labour and associated harms from reoccurring	✓			✓		
Grievance mechanisms				✓	✓	
Formal apologies				✓	✓	
Other, please specify:	✓					FRDM donates 5% of subscription fees directly to NGOs working on the issue
<b>Has the organization taken any measures 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?</b>						
Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.			✓	✓		Customer utilizes FRDM+ Services to identify and report on additional risks
Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.			✓	✓		Customer utilizes FRDM+ Services to identify and report on additional risks
No, we have not taken any remediation measures.			<b>Not Applicable</b>			
Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.	✓					Utilize FRDM App to find any additional potential infractions of FL/CL
<b>Does the organization currently provide training to employees on forced labour and/or child labour?</b>	<b>Yes</b>					FRDM+ Services
<b>If yes, is the training mandatory?</b>						
Yes, the training is mandatory for all employees.			✓			FRDM+ Services
Yes, the training is mandatory for employees making contracting or purchasing decisions.			✓			FRDM+ Services
Yes, the training is mandatory for some employees.			✓			FRDM+ Services
No, the training is voluntary.			✓			FRDM+ Services

QUESTIONNAIRE QUESTIONS

FRDM PRIMARY
FRDM SUPPORTS
FRDM+ SERVICES
CUSTOMER
3<sup>RD</sup> PARTY REQUIRED

**Does the organization currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?**

Yes

EXPLANATION

FRDM Reporting, FRDM Score

**If yes, what method does the organization use to assess its effectiveness? Select all that apply.**

Method	FRDM PRIMARY	FRDM SUPPORTS	FRDM+ SERVICES	CUSTOMER	3 <sup>RD</sup> PARTY REQUIRED	EXPLANATION
Setting up a regular review or audit the organization's policies and procedures related to forced labour and child labour		✓	✓	✓		FRDM+ Services Quarterly Review
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 -child labour clauses	✓					FRDM Reporting
Partnering with an external organization to conduct an independent review or audit of the organization's actions					✓	
Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators	✓					Supplier Link: Human Rights Assessment,
Other, please specify:	✓		✓			FRDM Reporting, FRDM+ Services Quarterly Review, FRDM+ Services Annual Report

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