



Canadian Security
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Service canadien du
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Fighting Against Forced Labour and Child Labour in Supply Chains Act

Annual Report 2024–25

Canada 

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Purpose

The purpose of this report is to provide an overview of the obligations of the Canadian Security Intelligence Service (CSIS) under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Supply Chains Act).

In compliance with the Supply Chains Act, CSIS is obligated to conduct regular risk assessments and report on its efforts to mitigate potential risks in its supply chains, including those related to human trafficking, by May 31 of each year.

Scope

The 2024–25 report covers the steps CSIS has taken during the fiscal year. The report outlines the risk-based approach taken relative to the goods and services procured by determining the highest exposure to human trafficking, forced labour, and child labour. This report aims to provide a comprehensive overview of the progress made in reducing human trafficking, forced labour, and child labour and identify areas for further improvement.

CSIS structure

Minister of Public Safety

The Honourable Gary Anandasangaree, P.C., M.P.

Director

Dan Rogers

Executives

Deputy Director, Operations

Deputy Director, Administration, Chief Financial Officer and Chief Transformation Officer

Deputy Director, Policy and Strategic Partnerships

Chief Audit and Evaluation Executive and Senior Officer for Disclosure of Wrongdoing

Chief Human Resources Officer

Assistant Director, Legal Services

Assistant Director, Collection

Assistant Director, Requirements

Assistant Director, Technology

CSIS activities

Since 1984, CSIS has continued to demonstrate its value to Canadians by providing the Government of Canada with crucial information and advice linked to threats to the security of Canada and to Canadian interests. The CSIS Act gives CSIS the mandate to investigate activities suspected of constituting threats to the security of Canada, including terrorism and violent extremism, espionage and sabotage, foreign interference, and subversion of government. In addition to providing advice to the Government of Canada on these threats, CSIS may also take lawful measures to reduce them. In addition, CSIS provides security assessments on individuals who require access to classified information or sensitive files within the Government of Canada, as well as security advice relevant to the *Citizenship Act* and the *Immigration and Refugee Protection Act*. Foreign intelligence collection from within Canada is also conducted by CSIS at the request of the Minister of Foreign Affairs or the Minister of National Defence.

The ever-evolving and persistent threat environment requires a nimble and dynamic operational approach. Canadians can be confident that when CSIS carries out its duties and functions, it acts in a manner consistent with fundamental Canadian rights and freedoms, and in line with its democratic values.

Given its mandate and specific operational requirements, and in order to protect the safety and security of Canadians, CSIS does not generally disclose details related to expenditures beyond those publicly reported in the Estimates, Public Accounts, and the Budget. This protocol takes precedence over other policy requirements, as CSIS' financial and procurement-related information is classified. As such, CSIS does not publish any such information on the Open Government Portal.

The CSIS Acquisition Policy acts in accordance with the Foundation Framework for Treasury Board Policies. The CSIS Acquisitions team adheres to the *Government Contracts Regulations (Financial Administration Act)*, the Public Services and Procurement Canada (PSPC) Supply Manual, and it incorporates the Standard Contract Clause Inventory (SCCI) clauses in all solicitations and awarded contracts.

In November 2021, PSPC implemented seven anti-forced labour requirement clauses that are now included in all Government of Canada goods contracts to ensure that contracts can be terminated if a good has been produced in whole or in part by forced labour or human trafficking. In December 2024, the anti-forced labour requirements were expanded to include new procurement clauses used in services, research and development, and architecture and engineering contracts, allowing Canada to terminate contracts if work has been produced in whole or in part by forced labour.

CSIS policies and due diligence processes

Policies

CSIS has used PSPC's tools and integrated the PSPC [Code of Conduct for Procurement](#) (the Code) in its purchasing activities to prevent and reduce the risk of forced labour or child labour in its procurement activities.

These tools include the SCCI.

While PSPC supports government institutions in their daily operations by acting as the central purchasing agent for the Government of Canada, CSIS undertakes activities under its own procurement authority, independently of the aforementioned PSPC tools. In addition, to prevent and reduce the risk of forced labour or child labour in its procurements, CSIS incorporates PSPC's anti-forced labour contract clauses.

During the previous fiscal year, CSIS purchased goods and services under its own procurement authority in the following areas up to an amount approved by the Treasury Board:

- Electronic data processing equipment;
- Telecommunications equipment and parts;
- Software;
- Security equipment and parts;
- Hardware;
- Audio-visual equipment and parts;
- Vehicles;
- Furniture; and
- Professional services.

Due diligence

Effective April 1, 2023, amendments to the Treasury Board *Directive on the Management of Procurement* require contracting authorities from all departments listed in Schedules I, I.1 and II of the *Financial Administration Act* (FAA) (with the exception of the Canada Revenue Agency), as well as commissions established in accordance with the *Inquiries Act* and designated as a department for the purpose of the FAA, incorporate the Code into their procurement activities.

Pursuant to the aforementioned amendments, CSIS has integrated the Code into its procurement activities in order to safeguard federal procurement supply chains from forced labour and child labour. Contracts that CSIS has awarded since April 1, 2024, incorporated the Code through the General Conditions for goods.

The Code requires that vendors providing goods and services to the Government of Canada and their sub-contractors comply with all applicable laws and regulations. In addition, the Code requires vendors and their sub-contractors to comply with Canada's prohibition on the importation of goods produced, in whole or in part, by forced or compulsory labour. This includes forced or compulsory child labour and applies to all goods, regardless of their country of origin.

The prohibition on the importation of goods produced wholly or in part by forced labour came into force under the *Customs Tariff* on July 1, 2020. This amendment implemented a commitment in the Labour Chapter of the Canada-United States-Mexico Agreement (CUSMA), and applies to all imports regardless of origin.

The Supply Chains Act came into force on January 1, 2024. This act maintains that business entities above a certain threshold must provide an annual report describing measures taken to prevent and reduce the risk that forced labour and child labour were used in their supply chains.

The CSIS procurement framework aligns with its security requirements when dealing with suppliers, including their supply chains policies. The verification of suppliers is critical and mandatory to identifying potential security concerns and ensuring the protection of sensitive CSIS information. The CSIS Procurement team conducts risk analysis related to each goods and services category to determine the highest risk of exposure to human trafficking, forced labour, and child labour. The analysis verifies the supply chains policies of its top ten manufacturers, covering more than 80% of its procurement of goods.

The supply chains of the top ten manufacturers that contribute to the production of goods produced, purchased, or distributed to CSIS, from sourcing raw materials to the final product, respect the fundamental human rights of all peoples within their business strategies, and adhere to the *United Nations Guiding Principles on Business and Human Rights Policy*, the *Uyghur Forced Labor Prevention Act*, the *Australia Modern Slavery Act (2018)*, the *UK Modern Slavery Act (2015)*, the *California Transparency of Supply Chains Act (2010)*, and the *Canadian Supply Chains Act*.

Overall, as a department listed in Schedules I, I.1 and II of the FAA, CSIS adheres to Treasury Board directives, policies and guides, namely the *Directive on the Management of Procurement*, and incorporates the Code and relevant anti-forced labour clauses into its procurement activities.

Forced labour and child labour risks

In May 2021, a risk analysis of PSPC's supply chains was completed by Rights Lab, of the University of Nottingham (UK), to determine which goods were at the highest risk of exposure to human trafficking, forced labour, and child labour. The analysis and subsequent report elaborated key strategies for PSPC to leverage public spending power to raise awareness about forced labour in supply chains.

CSIS is familiar with the risk assessment provided by PSPC, and continues to monitor related follow-up action, including the adoption of their policy on ethical procurement once finalized.

CSIS will apply similar processes resulting from the risk assessment such as:

- Pre-qualifying requirements at the bidding stage committing suppliers to engage with the policy and to provide their own policies and procedures to mitigate associated human rights risks.
- Collaborating with partners both internally to ensure that the policy is understood, disseminated, and acted upon, and externally to promote ethical procurement and to combat human trafficking, forced labour, and child labour.
- Reinforcing that termination may occur in cases where vendors fail to respect the terms of the Supply Chains Act.

Remediation measures

CSIS has not encountered any incidents where its vendors do not already have strict policies in place on forced labour, child labour, modern slavery, and/or human trafficking. As such, it has not been necessary to take measures to remediate forced labour or child labour, nor to remediate the loss of income to the most vulnerable families due to forced labour or child labour, through activities and supply chains.

CSIS will follow PSPC's risk analysis of human trafficking and apply the same measures. CSIS will also refer to the guidance and applicable resource information included in the *United Nations Guiding Principles on Business and Human Rights*.


Training

PSPC developed awareness-raising guidance materials (including risk mitigation strategies) for suppliers, which targets mainly high-risk sectors. CSIS will ensure that these materials, as well as supplementary training materials prepared by PSPC are provided to relevant employees.

Assessing effectiveness

CSIS continues to analyse its procurement activities and obtain its vendors' policies on forced labour, child labour, and human rights. Additional awareness to business owners and implementing procurement planning and strategies are intended in 2025–26.

While CSIS' tools offer due diligence as detailed above, the organization continues to review its procurement activities to include independent policies and programs related to forced labour and child labour.



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