



Financial Consumer  
Agency of Canada

Agence de la consommation  
en matière financière du Canada

# ANNUAL REPORT ON FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

FOR THE REPORTING PERIOD OF  
APRIL 1, 2024 TO MARCH 31, 2025



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## About this report

*The Fighting Against Forced Labour and Child Labour in Supply Chains Act* came into force on January 1, 2024. The Act stipulates that any government institution producing, purchasing or distributing goods in Canada or elsewhere must, on or before May 31 of each year, submit a report to the Minister of Public Safety and Emergency Preparedness. The report must detail the steps the government institution has taken during its 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 produced, purchased or distributed by the government institution.

Consequently, the Financial Consumer Agency of Canada (FCAC or the Agency) has created and submitted this annual report for the fiscal year 2024–2025 to the Minister of Public Safety and Emergency Preparedness, on the steps the Agency has taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods purchased or distributed by FCAC. FCAC's activities only relate to the purchasing of goods, in and outside of Canada.

As per section 8 of the Act, this report has been made available to the public, including by publishing it in a prominent place on the FCAC website. In addition, per section 22 of the Act, FCAC's annual reports will be held in an electronic registry on the Public Safety Canada (PSC) website, which is accessible to the public.

### Structure, activities and supply chains

FCAC was established in 2001 to protect the rights and interests of consumers of financial products and services in Canada. FCAC is a federal government agency that derives its mandate from the [Financial Consumer Agency of Canada Act](#). It is an independent agency of the Government of Canada and reports to Parliament through the Minister of Finance.

As a regulator, FCAC protects financial consumers by supervising the compliance of federally regulated entities with their market conduct obligations as established by legislation, codes of conduct and public commitments. FCAC's Supervision Framework describes the Agency's approach and the variety of supervisory tools and activities that FCAC uses to promote, monitor and enforce the obligations that govern federally regulated entities in Canada's financial ecosystem.

The Agency is also mandated to strengthen the financial literacy of Canadians and to:

- promote awareness of the rights and responsibilities of Canadians in their dealings with financial institutions
- monitor, evaluate and promote awareness of trends and issues that may affect financial consumers
- develop and publish research, content, tools and programs to strengthen the financial literacy of Canadians
- foster an understanding of financial services and related issues in collaboration with stakeholders, including government, regulatory and community organizations

In 2024–2025, FCAC awarded contracts for approximately \$1.18M for the purchase of goods to support its operations. These goods, procured mainly from Canadian vendors, primarily consisted of IT hardware, software, and furniture. Approximately 80% of the value of these acquisitions was made using Public Service Procurement Canada (PSPC) and Shared Services Canada (SSC) tools such as standing offers and supply arrangements, and contracts where PSPC and SSC acted as the contracting authority.

At FCAC, approximately 22% of the annual value of our purchases was made using PSPC tools such as Standing Offers and Supply Arrangements, and approximately 57% of the annual value of our purchases was made using Shared Services Canada (SSC) tools such as Standing Offers and Supply Arrangements.

Since November 2021, both PSPC and SSC have implemented anti-forced labour clauses in all goods contracts, to ensure that they can terminate contracts where there is credible information that the goods have been produced in whole or in part by forced labour or human trafficking.

Additionally, since November 20, 2023, all PSPC and SSC Standing Offers and Supply Arrangements for goods that have been issued, amended or refreshed include anti-forced labour clauses as part of the general conditions for goods.

As such, all our contracts for goods resulting from the use of PSPC and/or SSC tools include clauses relating to forced labour, which set out, among other things, human rights and labour rights requirements. These clauses can be found in the policy notification 150 – Anti-forced labour requirements.

In fiscal year 2024–2025, FCAC also purchased goods, such as IT hardware and software, not included under PSPC or SSC procurement vehicles. FCAC has integrated PSPC and SSC standard clauses as part of its general conditions for goods.

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

FCAC has integrated PSPC's Standard Contract Clauses, including PSPC's [Code of Conduct for Procurement](#) (the Code) and anti-forced labour clauses, in our purchasing activities.

In addition, to prevent and reduce the risk of forced labour or child labour in our procurements, FCAC has used the following list of PSPC's tools:

- Standing offers
- Supply arrangements
- Anti-forced labour contract clauses

PSPC has developed awareness-raising guidance materials (including risk mitigation strategies) for suppliers, targeted towards high-risk sectors. The materials are progressively becoming available on the Canada.ca website. FCAC has used PSPC's awareness materials to guide our suppliers and safeguard our supply chains from forced labour and child labour. We also refer our procurement personnel to these materials for awareness.

The April 1, 2023, amendments to the Treasury Board Directive on the Management of Procurement required several contracting authorities to incorporate the Code into their procurements. In compliance with these amendments, SSC has integrated the Code into its procurements.

To prevent and reduce the risk of forced labour or child labour in our procurements, FCAC has used the following list of SSC tools to which the Code applies:

- Standing offers
- Supply arrangements
- Contracts

As a common service provider, SSC is responsible for ensuring that government departments have access to reliable, secure and cost-effective IT infrastructure and solutions, including shared services related to networks and network security, data centres and Cloud offerings, digital communications, and IT tools.

FCAC also undertakes activities under its own procurement authority, independently of the aforementioned PSPC and SSC tools. During the 2024–2025 fiscal year, we purchased goods such as hardware and software under our own procurement authority.

## Policies and due diligence processes in relation to forced labour and child labour

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* (with the exception of the Canada Revenue Agency) and commissions established in accordance with the *Inquiries Act* and designated as a department for the purposes of the *Financial Administration Act* to incorporate the Code of Conduct for Procurement (“the Code”) into their procurements.

The Code requires that vendors, providing goods 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.

Pursuant to the aforementioned amendments, FCAC has continued to integrate the Code into its procurements, with a view to safeguarding federal procurement supply chains from forced labour and child labour.

Contracts that our organization has awarded included the Code through the General Conditions for goods. The prohibition on the importation of goods produced in whole 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.

## Identifying parts of your institution’s activities and supply chains that carry a risk of forced labour or child labour being used, and the steps taken to assess and manage those risks

In May 2021, a risk analysis of PSPC’s supply chains was completed by Rights Lab, of the University of Nottingham (U.K.), 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.

We took note of the findings and recommendations of this risk analysis, and are monitoring related follow-on actions, including the implementation of the Policy on Ethical Procurement and the development of a human rights due diligence framework.

SSC is committed to ongoing risk identification, promotion and development of mitigation practices, as well as ongoing activities to raise awareness within its procurement community and engage with industry and strategic partners.

FCAC has identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

The following aspects of our activities and/or supply chains have been identified as carrying some level of risk:

- The sector or industry it operates in
- The types of products it produces, sells, distributes or imports
- The locations of its activities, operations or factories

FCAC also leveraged the results of the Rights Lab supply chain risk analysis. The procurement team used these results to identify risks associated with its purchase of electronics and office supplies and devices. The procurement team continues to monitor its goods procurements, which helps prevent and reduce risks.

### Measures taken to remediate any forced labour or child labour

FCAC has not identified any forced labour or child labour in its activities and supply chains.

### 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 the institution's activities and supply chains

FCAC has 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/or supply chains. As such, no measures have been taken to remediate the loss of income for the most vulnerable families.

### Training provided to employees on forced labour and child labour

We are aware that PSPC has developed and is currently piloting a course for procurement officers. FCAC will leverage the course upon its publication for use across the Government of Canada.

SSC is committed to ongoing risk identification, promotion and development of mitigation practices, and activities to raise awareness within its procurement community and engage with industry and strategic partners.

In February 2025, the FCAC procurement team attended the International Contracting Officers Forum 2025: Combatting Human Trafficking in Government Procurement Practices.

### Assessing effectiveness in ensuring that forced labour and child labour are not being used in activities and supply chains

FCAC monitored PSPC's and SSC's progress on developing policies and procedures that assess the effectiveness in ensuring that forced labour and child labour are not being used in their activities and supply chains, with the intent to leverage this work while exploring and implementing solutions internally. FCAC will explore further measures in fiscal year 2025–2026, in collaboration with PSPC and SSC, to develop and implement its own monitoring and assessment approach.