



The National Battlefields
Commission

Commission des champs
de bataille nationaux

Fighting Against Forced Labour and Child Labour in Supply Chains Act

Annual Report 2024-25

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National Battlefields Commission
Annual report 2024-2025 on the application of the *Fighting Against Forced labor and
child labor in supply chains Act*

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Context and purpose of the report

In 2018, Canada engaged with four other countries in the development of principles guiding government action to combat human trafficking in global supply chains. Building on this commitment, the 2019-2024 National Strategy to Combat Human Trafficking framed federal activities through a whole-of-government approach outlining efforts to combat human trafficking. It is in the context of the coming into force of the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (hereinafter “the Act”) adopted on January 1, 2024, that the National Battlefields Commission (NBC) must report on the measures and initiatives it has put in place to help protect human rights in federal contracts. In accordance with section 6 of the Act, the NBC must report annually the efforts it has made to prevent and eliminate the risks of forced labour or child labour in its procurement.

Part 1: Identifying Information

Name of government institution: National Battlefields Commission (NBC)

Financial reporting year: April 1, 2024 to March 31, 2025

Reporting period: 2025

Information on the government institution: The NBC is a Canadian Heritage organization. Its offices are located in Quebec City.

Part 2 : Report contents

2.1 Information on the government institution’s structure, activities and supply chains

The NBC is an organization listed in *Schedule I* of the *Access to Information Act*. Employing 60 Full Time Equivalent (FTE), its mandate is to preserve, conserve and promote the Battlefields Park, a place offering a unique heritage and a dynamic space.

In 2024-2025, it is a \$12.7 million budget (including provisions and amortization and excluding salary expenses) that has been used to operate the NBC. Of this amount, 17% represented the purchase of goods and 83% represented the purchase of services. In

addition, 36% of this \$12.7 million budget was allocated to purchases made through Public Services and Procurement Canada (PSPC), which acts as central purchaser for the government, and through Shared Services Canada (SSC), which specializes in the acquisition of hardware, software, telecommunications and telephony products and services. These two intermediaries are following the federal government ethical standards in their procurement chain management.

More precisely, since November, 2021, PSPC and SSC implemented anti-forced labour clauses in all goods contracts to ensure that it 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 SCC Standing Offers and Supply Arrangements for goods that have been issued, amended, or refreshed include anti-forced labour clauses. As such, all of the contracts for goods resulting from the use of these 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.”

Furthermore, for purchases done on its own procurement authority, the NBC spent 100% on goods and services from Canadian suppliers subject to Canadian labour rules and standards that prevent labour exploitation. In total, it is \$ 96,874, less than 1 % of the budget, that was allocated in 2024-2025 for purchase from industries considered more at risk, namely IT and textiles.

The NBC's activities were limited to the purchase of assets in Canada. The goods purchased were mainly:

- Technological;
- For printing;
- Artistic in nature;
- Textile products;
- Vehicles;
- Furniture and equipment.

2.2 Information on the steps taken 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

In 2024-25, NBC procurement team made an internal assessment on the existing supply chain risks regarding forced labour or child labour. The results showed that this risk was low. Considering the low value amount identified in high-risk areas purchased directly by NBC combined with the high value amount of purchases through PSPC and SSC, NBC has not implemented new or additional measures. No other change has been made other than risks have been lowered since November 20, 2023, when PSPC and SSC included clauses in all standing offers and supply arrangements regarding forced labour and child labour. NBC intends to integrate similar clauses in all their procurement contracts.

In the course of next year, the NBC intends to include PSPC's awareness materials to guide its suppliers and safeguard its supply chains from forced labour and child labour. Furthermore, the NBC is referring its procurement team to these materials for awareness on the matter.

The April 1, 2023 amendments to the Treasury Board Directive on the Management of Procurement required several contracting authorities to incorporate the Code of Conduct for Procurement ("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, NBC has used the following list of SSC's 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. NBC can therefore benefit from

SSC expertise and be assured, when their services are solicited, that the best procurement practices regarding forced labour and child labour are followed.

2.3 Information on the policies and due diligence processes in relation to forced labour and child labour

As laid out in its 2022-25 Strategic Plan, the values to which the NBC adheres include respect and goodwill, the environment, rigor and equity, values incompatible to encouraging forced labor and child labor which is recognized as a form of modern slavery. Also, NBC strongly endorses the respect of Human Rights and Labor Laws.

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, the NBC 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 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.

In addition to complying with the code, NBC adheres to following practices implemented by PSPC for all its procurements. For the purchase of professional services, NBC will continue to deal locally with regulated professionals. Also, for direct purchases of goods

and services, NBC will deal with Canadian suppliers who are subject to Canadian law which prohibits forced and child labour.

2.4 Information on the parts of its activities and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage that risk

The NBC started the process of identifying risks, but there are still gaps in its assessments. In total, \$ 96,784, less than 1 % of operating budget expenses in 2024-25 were made in high-risk industries, namely information technology and textile. This amount is relatively small, but NBC wishes to implement necessary clauses in all procurement contracts as done by PSPC and SSC.

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. The NBC took note of the findings and recommendations of this risk analysis, and is monitoring related follow-up action, 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, and ongoing activities to raise awareness within its procurement community and engage with industry and strategic partners.

2.5 Information on any measures taken to remediate any forced labour or child labour

The NBC has taken certain remediation measures, but there still are gaps in its response that still need to be addressed. All procurement staff have been made aware to avoid contracting in forced labour and child labour situations and are aware of these risks. Although only 1 % of procurement is made in high-risk areas (IT and textile), contract clauses similar to PSPC's will be incorporated in NBC documents.

2.6 Information on any measures taken to remediate the loss of income to the most vulnerable families that result from any measure taken to eliminate the use of forced labour or child labour in the institution's activities and supply chains

The NBC has taken no action to address the loss of income for the most vulnerable families resulting from any measures taken to eliminate the use of forced or child labor in its operations and supply chains.

2.7 Information on the training provided to employees on the issue of forced labour and child labour

During 2024-25, the procurement team has been made aware of the risks of forced labour and child labour in NBC's contracting. The team will continue to obtain information on this issue and will take training offered by the Canada School of Public Services, more specifically with training surrounding ethical procurement and integrity in the procurement process. The training is mandatory for employees making procurement decisions.

The NBC is aware that PSPC has developed and is currently piloting a course for procurement officers. We will leverage the course upon its publication for use across the Government of Canada. Also, SSC is committed to ongoing risk identification, promotion and development of mitigation practices, and ongoing activities to raise awareness within its procurement community and engage with industry and strategic partners.

2.8 Information on how the government institution assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains

No policies or procedures were put in place in 2024-2025 to assess NBC's effectiveness in ensuring that forced labor and child labor are not used in its operations and supply chains.

Conclusion

NBC value the protection of human rights in Federal Government contracting.

The internal assessment made in 2024-25, after considering the significant purchases made through PSPC and SSC, most of other purchases made locally, and the awareness of the issue of forced labour and child labour, lends NBC to maintain the current procedures going forward.

Nevertheless, in view of reducing risks to their maximum, NBC will continue to monitor the issue and adopt best practices inspired by those implemented by PSPC and SSC.