



# Public Safety Canada

## S-211 Questionnaire

1. This report is for which of the following?
  - a. Entity
  - b. ~~Government institution~~
  
2. Legal name of reporting entity or government institution:  
Braden Canada Inc.
  
3. Financial reporting year (Start Date):
  - a. Month 1
  - b. Day 1
  - c. Year 2023
  
4. Financial reporting year (End Date):
  - a. Month 12
  - b. Day 31
  - c. Year 2023
  
5. Is this a revised version of a report already submitted this reporting year? Note: If yes, the previous version will be deleted and users will be unable to recover the previously submitted version.
  - a. ~~Yes~~
  - b. No
  
6. If yes, identify the date the original report was submitted:
  - a. ~~Month~~
  - b. ~~Day~~
  - c. ~~Year~~
  
7. Describe the changes made to the original report, including by listing the questions or sections that were revised (1500 character limit).
  
8. Business number(s) (if applicable):  
Braden Canada Inc. Ontario Corporation Number 002826922 and Business Number: 769492067
  
9. Is this a joint report?
  - a. ~~Yes~~
  - b. No
  
10. If yes, identify the legal name of each entity covered by this report.
  
11. Identify the business number(s) of each entity covered by this report, (if applicable).



12. Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?

- a. ~~Yes~~
- b. No

13. If yes, indicate the applicable law(s). Select all that apply.

- a. ~~The United Kingdom's Modern Slavery Act 2015~~
- b. ~~Australia's Modern Slavery Act 2018~~
- c. ~~California's Transparency in Supply Chains Act~~
- d. ~~Other, please specify:~~

14. Which of the following categorizations applies to the entity? Select all that apply.

- a. ~~Listed on a stock exchange in Canada~~

Canadian business presence (select all that apply):

- a. Has a place of business in Canada
- b. ~~Does business in Canada~~
- c. ~~Has assets in Canada~~

Meets size-related thresholds

- a. ~~Has at least \$20 million in assets for at least one of its two most recent financial years~~
- b. ~~Has generated at least \$40 million in revenue for at least one of its two most recent financial years~~
- c. ~~Employs an average of at least 250 employees for at least one of its two most recent financial years~~

15. Which of the following sectors or industries does the entity operate in? Select all that apply.

- a. ~~Agriculture, forestry, fishing and hunting~~
- b. ~~Mining, quarrying, and oil and gas extraction~~
- c. ~~Utilities~~
- d. ~~Construction~~
- e. ~~Manufacturing~~
- f. ~~Wholesale trade~~
- g. ~~Retail trade~~
- h. ~~Transportation and warehousing~~
- i. ~~Information and cultural industries~~
- j. ~~Finance and insurance~~
- k. ~~Real estate and rental and leasing~~
- l. Professional, scientific and technical services
- m. ~~Management of companies and enterprises~~
- n. Administrative and support, waste management and remediation services
- o. ~~Educational services~~
- p. ~~Health care and social assistance~~
- q. ~~Arts, entertainment and recreation~~
- r. ~~Accommodation and food services~~
- s. ~~Other services (except public administration)~~
- t. ~~Public administration~~
- u. ~~Other, please specify:~~



16. In which country is the entity headquartered or principally located?

Ontario , Canada

17. 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.

- a. ~~Mapping activities~~
- b. ~~Mapping supply chains~~
- c. ~~Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains~~
- d. ~~Contracting an external assessment of risks of forced labour and/or child labour in the organizations activities and supply chains~~
- e. ~~Developing and implementing an action plan for addressing forced labour and/or child labour~~
- f. ~~Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily~~
- g. ~~Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour~~
- h. ~~Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains~~
- i. ~~Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour~~
- j. ~~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~~
- k. ~~Developing and implementing child protection policies and processes~~
- l. ~~Developing and implementing anti-forced labour and/or child labour contractual clauses~~
- m. ~~Developing and implementing anti-forced labour and/or child labour standards, codes of conduct and/or compliance checklists~~
- n. ~~Auditing suppliers~~
- o. ~~Monitoring suppliers~~
- p. ~~Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour~~
- q. ~~Developing and implementing grievance mechanisms~~
- r. ~~Developing and implementing training and awareness materials on forced labour and/or child labour~~
- s. ~~Developing and implementing procedures to track performance in addressing forced labour and/or child labour~~
- t. ~~Engaging with supply chain partners on the issue of addressing forced labour and/or child labour~~
- u. ~~Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour~~
- v. ~~Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks~~
- w. ~~Information not available for this reporting period~~
- x. Other, please specify: none



18. Please provide additional information describing the steps taken (if applicable) (1500 character limit).
19. Which of the following accurately describes the entity's structure?
- a. Corporation
  - ~~b. Trust~~
  - ~~c. Partnership~~
  - ~~d. Other unincorporated organization~~
20. Which of the following accurately describes the entity's activities? Select all that apply.
- ~~a. Producing goods (including manufacturing, extracting, growing and processing)~~
    - ~~i. in Canada~~
    - ~~ii. outside Canada~~
  - ~~b. Selling goods~~
    - ~~i. in Canada~~
    - ~~ii. outside Canada~~
  - ~~c. Distributing goods~~
    - ~~i. in Canada~~
    - ~~ii. outside Canada~~
  - ~~d. Importing into Canada goods produced outside Canada~~
  - ~~e. Controlling an entity engaged in producing, selling or distributing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada~~
21. Please provide additional information on the organization's structure, activities and supply chains (1500 character limit).
22. Does the organization currently have policies and due diligence processes in place related to forced labour and/or child labour?
- ~~a. Yes~~
  - b. No
23. 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.
- ~~a. Embedding responsible business conduct into policies and management systems~~
  - ~~b. Identifying and assessing adverse impacts in operations, supply chains and business relationships~~
  - ~~c. Ceasing, preventing or mitigating adverse impacts~~
  - ~~d. Tracking implementation and results~~
  - ~~e. Communicating how impacts are addressed~~
  - ~~f. Providing for or cooperating in remediation when appropriate~~
24. Please provide additional information on the organization's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1500 character limit).  
Being developed in conjunction with the European ESG / CSRD of the headquarter in the Netherlands for year 2025.
25. Has the organization identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?



- a. ~~Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.~~
- b. ~~Yes, we have started the process of identifying risks, but there are still gaps in our assessments.~~
- c. No, we have not started the process of identifying risks.

26. 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.

- a. ~~The sector or industry it operates in~~
- b. ~~The types of products it produces, sells, distributes or imports~~
- c. ~~The locations of its activities, operations or factories~~
- d. ~~The types of products it sources~~
- e. ~~The raw materials or commodities used in its supply chains~~
- f. ~~Tier one (direct) suppliers~~
- g. ~~Tier two suppliers~~
- h. ~~Tier three suppliers~~
- i. ~~Suppliers further down the supply chain than tier three~~
- j. ~~The use of outsourced, contracted or subcontracted labour~~
- k. ~~The use of migrant labour~~
- l. ~~The use of forced labour~~
- m. ~~The use of child labour~~
- n. ~~None of the above~~
- o. ~~Other, please specify:~~

27. 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.

- a. ~~Agriculture, forestry, fishing and hunting~~
- b. ~~Mining, quarrying, and oil and gas extraction~~
- c. ~~Utilities~~
- d. ~~Construction~~
- e. ~~Manufacturing~~
- f. ~~Wholesale trade~~
- g. ~~Retail trade~~
- h. ~~Transportation and warehousing~~
- i. ~~Information and cultural industries~~
- j. ~~Finance and insurance~~
- k. ~~Real estate and rental and leasing~~
- l. ~~Professional, scientific and technical services~~
- m. ~~Management of companies and enterprises~~
- n. ~~Administrative and support, waste management and remediation services~~
- o. ~~Educational services~~
- p. ~~Health care and social assistance~~
- q. ~~Arts, entertainment and recreation~~
- r. ~~Accommodation and food services~~
- s. ~~Other services (except public administration)~~
- t. ~~Public administration~~



- u. ~~None of the above~~
- v. Other, please specify: none

28. Please provide additional information on the parts of the organization's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the organization has taken to assess and manage that risk (if applicable) (1500 character limit)

29. Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains?

- a. ~~Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.~~
- b. ~~Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.~~
- c. ~~No, we have not taken any remediation measures.~~
- d. Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

30. If yes, which remediation measures has the organization taken? Select all that apply.

- a. ~~Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support~~
- b. ~~Compensation for victims of forced labour or child labour and/or their families~~
- c. ~~Actions to prevent forced labour or child labour and associated harms from reoccurring~~
- d. ~~Grievance mechanisms~~
- e. ~~Formal apologies~~
- f. ~~Other, please specify:~~

31. Please provide additional information on any measures the organization has taken to remediate any forced labour or child labour (if applicable) (1500 character limit).

Not applicable

32. 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?

- a. ~~Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.~~
- b. ~~Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.~~
- c. ~~No, we have not taken any remediation measures.~~
- d. 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.

33. Please provide additional information on any measures the organization has 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 its activities and supply chains (if applicable) (1500 character limit).

Not applicable



34. Does the organization currently provide training to employees on forced labour and/or child labour?
- a. ~~Yes~~
  - b. No
35. If yes, is the training mandatory?
- a. ~~Yes, the training is mandatory for all employees.~~
  - b. ~~Yes, the training is mandatory for employees making contracting or purchasing decisions.~~
  - c. ~~Yes, the training is mandatory for some employees.~~
  - d. ~~No, the training is voluntary.~~
36. Please provide additional information on the training the organization provides to employees on forced labour and child labour (if applicable) (1500 character limit).  
Not applicable
37. 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?
- a. ~~Yes~~
  - b. No
38. If yes, what method does the organization use to assess its effectiveness? Select all that apply.
- a. ~~Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour~~
  - b. ~~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~~
  - c. ~~Partnering with an external organization to conduct an independent review or audit of the organizations actions~~
  - d. ~~Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators~~
  - e. ~~Other, please specify:~~
39. Please provide additional information on how the organization assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable) (1500 character limit).  
Not applicable
40. Upload report (Required) (100MB limit):  
Upload your report, including the signed attestation, in PDF format
41. Upload report in second Canadian official language (Optional) (100MB limit):  
Upload your report, including the signed attestation, in PDF format
42. Please identify the name, title and email address of the person authorized to fill out this questionnaire.



(Note: Public Safety Canada may use the contact information provided should it require additional details regarding the submission. Info will be used as per the privacy note statement.)