



# Fighting Against Forced and Child Labour Report

2023-2024

# Introduction

This is the first report prepared by Canadian Standards
Association and CSA Group Testing & Certification Inc., both
incorporated under the laws of Canada ("CSA Group"), for
the financial year ending March 31, 2024 ("Reporting Period")
pursuant to Canada's Fighting Against Forced Labour and
Child Labour in Supply Chains Act ("Act").

CSA Group is a service provider and does not manufacture products, however we import goods into Canada on an as-needed basis to support our delivery of services.

We are committed to high standards of ethical conduct as outlined in our <u>Code of Conduct</u>. We do not tolerate forced labour or child labour in our operations and supply chains. This Report supplements our Code of Conduct and provides an overview of measures taken when procuring goods for import into Canada to reduce the risk that forced or child labour is used at any step of the production and supply process.

# **About Us**

CSA Group is a global organization dedicated to safety, social good and sustainability, with 2,050 employees globally and offices across 17 countries. We are a leader in Standards Development and in Testing, Inspection and Certification around the world including Canada, the U.S., Europe, and Asia. Our mandate is to hold the future to a higher standard.

# **Standards Development**

Canadian Standards Association is an accredited notfor-profit standards development organization and is the parent organization to CSA Group's testing and certification subsidiaries. Our mission is to enhance the lives of Canadians through the advancement of standards in the public and private sectors. We are a leader in standards research, development, education, and advocacy. The technical and management standards developed with our more than 11,000 members improve safety, health, the environment, and economic efficiency in Canada and beyond.

We facilitate the development of standards in sectors, including:

- Construction & Infrastructure
- Electrical
- Environment & Natural Resources
- Fuels & Transportation
- Health Care & Well-being
- Management Systems
- Mechanical & Industrial Equipment
- Nuclear
- Occupational Health & Safety
- Petroleum & Natural Gas
- Public Safety

## **Testing, Inspection & Certification**

CSA Group's global testing, inspection and certification subsidiaries are accredited to provide testing, inspection and certification services that enable manufacturers to demonstrate that their products comply with applicable safety, environmental, and operating performance standards and codes for markets around the world.

We provide testing, inspection, and certification services in the product areas, including:

- Appliances
- Construction & Building Products
- Power Generation & Energy Storage
- Industrial & Hazardous Locations Equipment
- Information & Communication Technology (ICT)
- Lighting
- Medical & Laboratory Equipment
- Personal Protective Equipment (PPE)
- Tools & Outdoor Equipment



# **Governance Structure**

Corporate governance at CSA Group begins with our independent Boards of Directors. Our two Boards, for the not-for-profit Canadian Standards Association (elected by our membership) and for-profit subsidiary CSA Group Testing & Certification Inc., each have three committees with delegated responsibilities: the Audit, Finance & Risk Committee (AFRC), Corporate Governance & Nominating Committee (CGNC), and the Human Resources & Compensation Committee (HRCC).

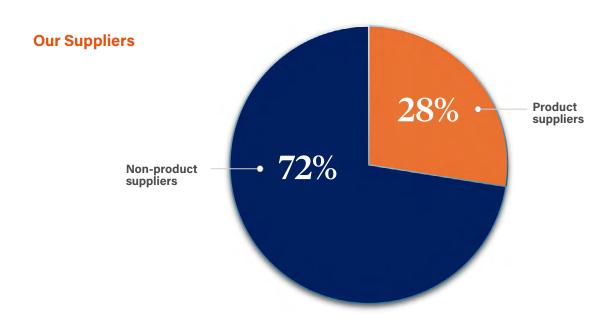
This committee structure enables sharing of Board oversight responsibilities among smaller, focused groups. The committees regularly report their activities to the full Board, and major decisions are not delegated and require Board approval.

The Boards operate in adherence with our Board Charter which is signed annually by all Directors, and our committees operate in adherence with their Mandates. The Charter, Mandates, and other governance documents, including the board workplan, undergo a governance review annually.

- The CGNC oversees governance matters and has delegated responsibility for oversight of our ethics and compliance programs, initiatives, and policies, including our ESG program
- The AFRC oversees the organization's risk management, internal and external audits, legal and compliance, and finance/procurement functions. Internal audit is delegated to an external third party that takes direction from the AFRC
- The HRCC oversees human resources and health and safety policies and practices within the organization



# **Supply Chains**



CSA Group sources goods and services from suppliers worldwide. Our global supply chain is made up of 1,268 product suppliers and 3,341 non-product suppliers, providing mainly:

- Lab equipment and supplies
- Lab services
- Third party lab and certification services
- Consulting and professional services
- Information technology (IT), broadcasting and telecommunications supplies and services
- Marketing and distribution services
- Business and corporate management services
- Building, construction and maintenance services

Much of our testing and certification is conducted in our 18 laboratories by our own employees, enabling us to exercise direct control over our operations and reducing our risk of non-compliance with the Act. Where we cannot complete certification and inspection services in house, we subcontract these services to accredited third party laboratories that are subject to similar audit processes and requirements by our accreditation bodies.

We purchase and import equipment for use in our Canadian testing laboratories or for employee use in delivering services (for example, a new piece of test equipment, lab coats or personal protective equipment). We understand that there may be a risk that forced or child labour is used in the production or supply of these imported goods. Next year, we will complete a formal assessment of goods procured to identify specific product categories that carry higher risk and require additional oversight.



# **Due Diligence**

CSA Group is committed to upholding the human rights of workers, prohibiting and refraining from any kind of forced or child labour, and treating employees with dignity and respect. We expect this within our own operations, and of our suppliers, and engage in various due diligence practices to validate ongoing compliance.

## **Our Policies**

Our policies set out the principles of how we operate and the expectations we have of third parties we do business with. We maintain the following policies pertaining to forced and child labour:

- CSA Group <u>Code of Conduct</u>
- Supplier Code of Conduct
- Global Procurement Policy

Under these policies, employees, suppliers, and contractors are required to:

- Respect and comply with the fundamental rights granted to all employees and apply at a minimum the labour standards outlined by the International Labor Organization (ILO), as well as applicable laws and regulations
- Prohibit and refrain from any kind of child or forced labour within their respective organizations and throughout the supply chain

- Provide compensation to employees in compliance with applicable wage laws
- Respect the right of employees to form and join trade unions, to bargain collectively, and engage in peaceful assembly
- Take appropriate action, including implementation of policies, standards, procedures, contingency measures, and management systems, to prevent occupational illness and work-related accidents and to foster a healthy and safe workplace for employees
- Maintain records as required by statute, and to validate compliance with our policies
- Maintain a workplace free of violence, discrimination and harassment
- Ensure fair and safe working conditions that comply with all applicable labour and employment laws and support the health of employees



#### **Our Procurement Process**

Our procurement policies and procedures require screening and selection of suppliers based on defined criteria and are implemented for all third party transactions involving payment for goods or services.

New suppliers are required to complete a Supplier Ethics & Compliance Checklist in which they disclose and attest whether:

- Key personnel have been investigated, charged or convicted for engaging in illegal activity linked to unethical conduct
- They conduct ethics training for key personnel
- They prohibit forced and child labour
- They comply with, and require their suppliers and subcontractors to comply with, labour and employment, business ethics and data protection laws and regulations

Suppliers must comply with our Supplier Code of Conduct as a condition of contracting with us. Our contract templates also contain a term requiring ongoing compliance with the Code, and our Legal & Compliance team is engaged in reviewing any deviations from standard contractual terms.

## **Training & Organizational Awareness**

We understand that worker safety and human rights are organizational responsibilities. It is important that employees are aware of our requirements regarding prevention of risk of forced or child labour in our supply chains.

For this reason, we have implemented the following:

- Annual Code of Conduct training and attestation by every employee
- Supplier Code of Conduct training and attestation required by contingent workers
- Tracking and periodic review of training completion and associated metrics



- 24-hour anonymous ethics reporting hotline
- Investigation procedure for ethics reports
- Remedial action for validated ethics reports

## **Our Hiring Practices**

Maintaining fair and safe working conditions is among our core values. We implement a number of related processes and controls including:

- Regular review of internal policies to ensure compliance / alignment with applicable laws and regulations
- Due diligence in recruitment to validate that all employees are of legal working age
- Controls in our recruitment process to ensure fairness



#### **Our Initiatives**

#### **ESG**

Over the past two years, CSA Group has been investing in and developing our Environmental, Social and Governance (**ESG**) program which is comprised of four pillars:

- Our Influence: We support many of the ESG objectives and programs of our stakeholders through the work of our Standards organization and our commercial subsidiaries in Testing, Inspection, and Certification (TIC)
- Our Footprint: The environmental impact of our operations and specifically our energy sources, amount and concentration of waste and emissions, and our impact on nature and biodiversity
- People & Communities: How we manage, support, and engage with our employees and the communities in which we operate
- Our Governance: Ethics and compliance, responsible procurement, and other governance practices that support our mission

Through this program, we monitor that the underlying aspects of our operations, including responsible sourcing and ethical compliance practices, align with our ESG commitments. We will continue to work on our ESG initiatives to advance our practices in these areas.

## **TIC Council**

CSA Group is a member of TIC Council, an international organization that advocates for the testing, inspection and certification community globally while promoting best practices in ethics and compliance. As part of our membership, our compliance program, including policies and procedures relevant to the Act, is audited annually by an independent third party.

## **Assessment of Effectiveness**

CSA Group has a number of measures in place to prevent and reduce the risk that forced or child labour is used in our operations and supply chains. We have not yet assessed the effectiveness of these measures. However, we will be reinforcing our monitoring efforts over the next year.

## Reporting

EthicsPoint Hotline is a confidential, anonymous tool for employees and outside parties to report misconduct. The EthicsPoint service is available 24 hours a day, 365 days a year and is accessible globally through the international toll-free phone numbers or website listed below. Investigations are overseen confidentially by the Chief Legal, Ethics & Compliance Officer.

## **Toll-Free Numbers:**

**Canada** 1-855-212-7615

Canada (French) 1-855-350-9393

China (Southern) 10-800-120-1239

China (Northern) 10-800-712-1239

**Germany** 0800 0010296

India 000-800-001-6112/000-800-001-1071

Italy (includes San Marino, Vatican City) 800 974 750

Japan 0066-33-112505/00531-121520

Korea 00308-110-480/00798-1-1-009-8084/

00798-14-800-6599

**Mexico** 001-800-840-7907/001-866-737-6850

Netherlands 0800 3510020

**Singapore** 800-1204201

**Taiwan** 00801-13-7956

**UK** 0800-032-8483

**US** 1-855-212-7615

Online: www.csa.ethicspoint.com



# Year-At-A-Glance

The following chart reflects our findings from the past financial year.

Metric	Figure	Why we track this	Our goal
Number of EthicsPoint reports pertaining to forced and child labour incidents	0	Tracking this number allows us to appropriately address concerns and implement strategies to reduce the risk of occurrence or violation with the Act	Zero violations
Completion of Code of Conduct trainings	100%	Monitoring completion of trainings help us ensure that employees are aware of laws and obligations pertaining to forced and child labour	100% completion rates
Completion of Supplier Code of Conduct trainings	100%	Monitoring completion of trainings to help ensure that contingent workers are aware of laws and obligations pertaining to forced and child labour	100% completion rates
Completion of Supplier Ethics & Compliance Checklist by new suppliers	100%	This allows us to determine whether suppliers monitor their own, and their suppliers, compliance with anti-forced and child labour laws and regulations	Ensure that all new suppliers continue to complete this Checklist  Monitor ongoing compliance with the principles in this Checklist

This year, no incidents of forced or child labour in our operations or supply chains were identified. As such, remediation measures were not required. However, in the event that an incident is reported or identified, we will investigate and implement an appropriate course of action in accordance with applicable laws and regulations.





# **Next Steps**

We recognize that our commitment to identifying and mitigating risk of forced and child labour in our supply chains is iterative and ongoing. We have identified the following continuous improvements for our organization:



Create and maintain a matrix assessing the risk of specific goods being sourced from higher risk jurisdictions



Refine our supplier onboarding practices to identify higher risk jurisdictions for sourcing



Develop a process for ongoing screenings and audits of our suppliers to ensure continued compliance with our policies



Implement a standalone Forced and Child Labour Policy and accompanying training



Explore collaborations pertaining to human rights and responsible sourcing





# **Approval & Attestation**

This joint Report was approved pursuant to subparagraph 11(4)(b)(i) of the Act by the Board of Directors of both Canadian Standards Association and CSA Group Testing & Certification Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Canadian Standards Association and CSA Group Testing & Certification Inc.



Director, President & CEO
Canadian Standards Association
CSA Group Testing & Certification Inc.



# **About CSA Group**

CSA Group is a global organization dedicated to safety, social good and sustainability. We are a leader in North American standards development and in product testing, inspection and certification around the world. Our mandate is to hold the future to a higher standard.

