

## Components of the report

The questionnaire asks for the following identifying information about the entity and about the report:

- Reporting entity's legal name = EnTrans International, LLC
- Financial reporting year = CY2023
- Identification of a revised report = None
- Business number(s), if applicable= EIN = 4726229264
- Identification of a joint report, if applicable = None
- Identification of reporting obligations in other jurisdictions
- Entity categorization according to the Act =
- Sector/industry = Manufacturing
- Location = Corporate office in Athens, TN.

Entities must address each of the requirements included in section 11 of the Act in their annual report. This includes:

- A description of the steps taken to prevent and reduce risks of forced labour and child labour, as per subsection 11(1) – We do not have a policy as of now, but by 5/31, we will have an updated ESG policy, we will show that our websites & the same will be included in our PO's to our suppliers.
- Supplementary information addressing each of the seven requirements in subsection 11(3)

Entities are encouraged to refer to the list of resources for further guidance as they prepare their report.

Subsection 11(1) provides that an entity must also describe the steps it has taken during 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.

- As per subsection 11(3), an entity must provide information on each of the following: We do not have a policy as of now, but by 5/31, we will have an updated ESG policy, we will show that our websites & the same will be included in our PO's to our suppliers.

Its structure, activities and supply chains

- a. Its policies and its due diligence processes in relation to forced labour and child labour
- b. The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk
- c. Any measures taken to remediate any forced labour or child labour



- d. Any 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 its activities and supply chains
- e. The training provided to employees on forced labour and child labour
- f. How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

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

The questionnaire provides examples of measures that entities may have taken to prevent and reduce risks of forced labour and child labour. This list is not exhaustive, and entities are encouraged to name any other steps they have taken in the "Other" category. Entities are also encouraged to provide additional information describing their actions. Examples of additional information include:

- Whether the actions were applied broadly or to specific parts of the entity's activities and supply chains
- Which issues the actions aimed to address (e.g., whether the action addressed forced labour or child labour)
- Which groups the actions were directed towards (e.g., which supply chain partners or stakeholders the entity engaged with)
- Details of the actions taken (e.g., which policies and processes were implemented, how they were implemented and for what purpose)

If an entity controls other entities, it must also describe the steps that these controlled entities have taken to prevent and reduce risks of forced labour and child labour.

There may be overlap between the steps entities identify in this section and responses to subsequent questions, such as the questions on due diligence and on training for employees. This is expected and acceptable. Entities may provide in their report and questionnaire, information on actions taken that could prevent forced and child labour, such as organizational action plans and codes of conduct.

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## Requirement (a) – Structure, activities and supply chains

**Structure** refers to the entity’s legal and organizational form. When reporting on structure, entities may include the following details:

- Legal structure, including legal classification (i.e., corporation, trust, partnership, unincorporated organization, etc.) == **Corporation**
- Organizational structure (i.e., departmentation, chain of command, etc.) == **CEO, with functional departmental heads**
- Organizational mandate or role ==
- Number of employees, both in Canada and outside Canada = **Globally we have ~ 2000 employees**
- Partner organizations, or membership in a group == **We are part of several organizations in the industry/end customer that we cater to.**
- Control of other entities, including what the controlled entities do and where they are located  
**Corporate office is located in Athens, TN, USA & facilities in North America & S.e.Asia**

For the purposes of the Act, **activities** include all pursuits undertaken by the entity in relation to the production or importation of goods by the entity.

When reporting on activities, entities may include information on:

- Production, manufacturing, growing, extracting, processing, sale or distribution of goods, both in Canada and outside Canada, including the kinds and volumes of goods produced, manufactured, grown, extracted, processed, sold or distributed
- Importation of goods into Canada, including the kinds and volumes of goods imported and the locations from which the goods are imported
- Locations of operation (countries or regions)

**We manufacture & sells goods in Canada & in USA**

Entities should also describe the activities of any entities under their control. Note that entities are only required to report on the activities of subsidiaries that are entities with reporting obligations under the Act. For more information, entities should refer to the [guidance on the application of the Act](#).

The **supply chain** includes suppliers of goods and services that contribute to the production of goods produced, sold, distributed or imported by the entity, from sourcing the raw materials to the final product. It therefore includes direct and indirect suppliers and service providers, both in Canada and outside Canada. An entity’s supply chain does not include the end users or customers who purchase its products or services.

When describing their supply chains, entities should aim to identify to the greatest extent possible the source countries or regions of origin of each of the goods and services used at each stage of the supply chain.

Entities should aim to provide a complete overview of their structure, activities and supply chains, meaning



that they should not omit information about aspects of their structure, activities and supply chains that they have judged carry no risk of forced labour or child labour.

The lists of examples given above are not exhaustive, and entities are encouraged to provide additional information, as appropriate.

## Requirement (b) – Policies and due diligence processes

**Due diligence** is a process to identify and respond to the real and potential adverse impacts of activities throughout the supply chain. The OECD Due Diligence Guidance for Responsible Business Conduct provides that the due diligence process and its support measures involve the following steps:

- Embedding responsible business conduct (RBC) into policies and management systems
- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate

For more information on the meaning of due diligence and the ways in which an entity can implement due diligence practices, please see the list of additional resources.

If an entity controls other entities, it must also describe the policies and due diligence processes that these controlled entities have in place.

In an entity's report, it may choose to describe how its policies and due diligence processes on forced labour and child labour relate to its environmental, social and governance (ESG) initiatives or to a broader organizational Responsible Business Conduct (RBC) strategy, policies or mandate.

## Requirement (c) – Forced labour and child labour risks

The Act requires entities to identify parts of their activities and supply chains that carry a risk that forced labour or child labour being used either in the entity's own activities, or in the activities of any entities it controls or those of its direct or indirect suppliers. Identifying parts of an entity's activities and supply chains that carry a risk does not require indicating that forced labour or child labour was or is actually being used. Rather, entities are asked to show that they have considered the ways in which their activities and supply chains could potentially cause, contribute to or be directly or indirectly linked to actual or potential risk that forced labour or child labour is used by them or in their supply chains.

No sectors or industries involving the production or importation of goods are assumed to be entirely free of forced labour and child labour risks. The purpose of reporting is not to certify that an entity is "risk-free," but rather to demonstrate that the entity has taken steps to identify and address risks. The reporting exercise is intended to encourage transparency, not to penalize entities for having identified risks in their activities and

supply chains.

Entities should not disclose commercially sensitive information or report on specific cases or allegations of forced labour or child labour in a manner that would create legal or privacy concerns.

The questionnaire allows entities to identify general aspects of their activities and supply chains that carry a risk of forced labour and child labour, as well as the sectors and industries that those risks relate to. Entities are encouraged to provide additional information. For example, entities may specify that they have identified risks related to a particular sector, industry, country or region; the production of a particular product; or a particular step in the supply chain.

Entities may choose to volunteer information about instances of forced labour or child labour that have been identified, but are not required to do so. If this information is included, entities should ensure that their report does not compromise any individual's privacy. For example, entities may describe their response to forced labour or child labour identified in a particular part of their activities or supply chains using an anonymized case study.

Additionally, the questionnaire allows entities to describe the steps that they have taken to assess and manage the forced labour and child labour risks identified. In other words, entities should explain how they have identified risks (i.e., mapping supply chains, conducting a risk assessment, etc.) and how they have dealt with the risks identified. Entities may do this for each risk identified, or choose to provide a general description of how they assess and manage risks.

If an entity controls other entities, it must also describe the steps that these controlled entities have taken to identify, assess and manage forced labour or child labour risks in their activities and supply chains.

### **Requirement (d) – Remediation measures**

**Remediation** and remedy refer to both the processes of providing remedy for an adverse impact and to the substantive outcomes (i.e., remedy) that can counteract, or “make good,” the adverse impact. In the case of business and human rights, which includes forced labour and child labour, remedies provided may take a range of forms, the aim of which will be to counteract or address any human rights harms that have occurred.

Appropriate remedies vary depending on the circumstances.

For more information on the meaning of remediation, please see the [United Nations Guiding Principles on Business and Human Rights](#) and the [list of additional resources](#).

The questionnaire includes a list of possible remediation measures. This list is not exhaustive, and entities are encouraged to provide additional information.

If an entity controls other entities, it must also describe the remediation measures that these controlled entities have taken, if applicable.

As with reporting on risks of forced labour and child labour, the purpose of requiring entities to describe the



measures they have taken to remediate any forced labour or child labour is to encourage transparency.

Entities should not disclose commercially sensitive information or report on specific cases or allegations of forced labour or child labour in a manner that would create legal or privacy concerns.

If entities have assessed that their activities and supply chains do not carry a risk of forced labour or child labour being used, and the question of remediation is considered not applicable, then stating this in their report would be sufficient to address this requirement. Alternatively, entities may indicate that no measures have been taken to remediate forced labour or child labour in their activities and supply chains, if that is the case.

### **Requirement (e) – Remediation of loss of income**

Efforts to prevent and reduce the risk of forced labour and child labour can have the unintended consequence of contributing to a loss of income for vulnerable families. Requirement (e) refers to any 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 entity’s activities and supply chains.

If an entity controls other entities, it must also describe the measures that these controlled entities have taken to remediate loss of income, if applicable.

As with requirement (d), if entities have judged that vulnerable families have not experienced loss of income as a result of steps the entity has taken to eliminate forced labour or child labour risks, or if no measures have been taken in this area, then stating this in the report is sufficient to address this requirement.

### **Requirement (f) – Training**

Training on forced labour and child labour may take a range of forms, from formal training courses to awareness-raising activities. When reporting on the training that entities may provide to employees, they may choose to provide the following details:

- Whether the training is mandatory or optional
- Whether the training is entity-wide or only covers employees in specific areas of the entity
- Which groups or levels of employees receive the training (e.g., whether the training covers senior management/executive-level staff)
- The content of the training, including whether it covers forced labour, child labour or both
- How the training was developed, including whether it was developed internally or by an external organization
- The length of the training
- Any mode(s) of assessment included in the training
- How many employees have received or will receive the training

This list of examples is not exhaustive, and entities are encouraged to provide additional information, as



appropriate.

In addition to describing the training provided to an entity's direct employees, entities may choose to describe any training or awareness materials provided to partners or suppliers, if applicable.

If an entity controls other entities, it must also describe the training that these controlled entities provide to employees on forced labour and/or child labour, if applicable.

### **Requirement (g) – Assessing effectiveness**

The questionnaire includes a list of examples of steps entities may take to assess their effectiveness in ensuring that forced labour and child labour are not being used in their activities and supply chains. This list is not exhaustive, and entities are encouraged to provide additional information.

Entities are required to report on how they assess their effectiveness, not to give the results of that assessment. In other words, entities should describe the policies, processes and other actions they have implemented to measure and track their success in preventing and reducing risks of forced labour and child labour in their activities and supply chains.

Alternately, entities may indicate that no actions have been taken to assess their effectiveness in preventing and reducing risks of forced labour and child labour in their activities and supply chains. Stating this in a report is sufficient to address this requirement.

If an entity controls other entities, it must also describe how these controlled entities assess their effectiveness in ensuring that forced labour and child labour are not being used in their activities and supply chains.

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

Kartik Ramachandran

SVP – Strategic Sourcing

5/16/24



Signature, accompanied by the statement, I have the authority to bind 'EnTrans, International, LLC.'"



