

Canadian Statement Against Forced Labour and Child Labour in Supply Chains
pursuant to an Act to enact the Fighting Against Forced Labour and Child Labour in
Supply Chains Act and to amend the Customs Tariff,
referred to as Canada's "*Modern Slavery Act*" (the "**Act**")
for calendar year 2023

1. INTRODUCTION

This is a statement made by Follett Content Solutions, LLC on behalf of it and its subsidiaries ("Follett"), in respect of the Act, as referenced above.

Follett Content Solutions, LLC is a limited liability company incorporated pursuant to the laws of Delaware, United States of America.

2. REPORTING ENTITY

Follett Content Solutions, LLC, GSD No. 742874209

3. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Follett School Solutions, LLC is a Delaware licensed limited liability company that sells books, both print and digital books ("Content") to K-12 schools and school districts.

4. POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

This industry, the sale of books, is a low-risk area for forced labour and child labour. Even so, Follett has compliance measures in place to address concerns both within the US and outside the US. For example, all employees are required to execute the Company's Code of Conduct on an annual basis which requires compliance with international, federal, state and local laws. The Code further requires that each and every employee conduct themselves with the highest degree of moral and ethical standards. Significantly, Follett encourages its employees to raise and report ethical concerns and alleged violations of law by making various reporting avenues available. Employees and others may raise concerns and report violations of law or ethics by phone or email (anonymous if preferred) to Follett's Ethics and Compliance hotline, which may be anonymous, or to a Company manager, supervisor, Human Resource department and its Legal department. The Company's no-retaliation policy protects employees from any adverse action for making a good faith complaint.

While the Code of Conduct does not expressly address child labor and forced labor, revisions are underway to also enumerate those specific areas in the Company's Code of Conduct and include cover forced labor in its annual mandatory compliance training. The Company is also in the process of finalizing a Supplier Code of Conduct that specifically includes a prohibition against forced labour and child labour among other prohibitive conduct, to distribute to its suppliers.

Follett has a policy and practice prohibiting the employment of minors consistent with U. S. state law and requires all employee attend an annual mandatory compliance training which includes educating employees on this policies and others. Significantly, Follett has a long-standing practice of requiring all new employees submit to the e Verify process. e Verify, a government approved internet-based system, determines the employment eligibility of both US and foreign citizens to work in the US. It by comparing information entered by an employer from an employee's I-9, Employment Eligibility Verification, to records available to the U.S. Department of Homeland Security and Social Security Administration. The information confirms date of birth and citizenship, among other important information. Through strict compliance with this policy and practice, Follett is able to confirm, based on available records, that the new hire is of an age legally permitted to work in their respective state and either a US citizen or citizen of a foreign country which assists in identifying forced labour.

Additionally, the Company created a Corporate Social Responsibility Committee (CSR) which included review of many areas including forced and child labour. The committee plans to review initiatives such as raising awareness on this topic within the organization.

5. PARTS OF BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR AND STEPS TAKEN TO ASSESS AND MANAGE THAT RISK

Follett has not started the process of identifying risks because this industry, the sale of books, is a low-risk area for forced labour and child labour. No risks have been identified to date.

6. MEASURES TAKEN TO REMEDIATE FORCED LABOUR AND CHILD LABOUR

Follett has not identified any incidents of forced labour or child labour, and therefore the Company has not taken any steps to remediate forced labour and child labour.

7. MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO MOST VULNERABLE FAMILIES THAT RESULT FROM MEASURES TAKEN TO ELIMINATE USE OF FORCED LABOUR AND CHILD LABOUR

Follett has not identified any incidents of forced labour or child labour, has not taken any steps to remediate forced labour and child labour and consequently, has taken no measures to remediate the loss of income to most vulnerable families that results from measures taken to eliminate use of forced labour or child labour.

8. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

The Company implemented annual mandatory compliance training which includes among other topics, child labour, commonly referred to in the US as child labor standards which is governed by state law The Company plans to also expressly include forced labour as a topic on a go forward basis commencing in 2024.

9. HOW ENTITY ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR IS NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS

As noted above in Section 4, the Company audits its e Verify practice on a monthly basis and reports on compliance. Records show compliance is at 100%.


Additionally, the Legal department reviews all cases reported to its Business and Ethics hotline on a monthly basis. All serious concerns and reports, including those raised outside the organization, are presented to its Legal department for immediate review.

ATTESTATION

“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. For clarity, I am providing this attestation in my capacity as a director and officer of Follett Content Solutions, LLC, and not in my personal capacity.”

I have the authority to bind Follett Content Solutions, LLC

May 29, 2024


Britten Follett (May 29, 2024 08:56 CDT)
Britten Follett
Chief Executive Officer of Follett Content
Solutions, LLC
Officer, Follett Content Solutions, LLC






Canadian Modern Slavery Statement v1

Final Audit Report

2024-05-29

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