

Modern Slavery Report 2024

This is a modern slavery report (the “**Report**”) prepared on behalf of Forensic Technology (Canada) Inc. (the “**Corporation**”). This Report is produced by Forensic Technology (Canada) Inc. (the “**Corporation**”, or “**our**” or “**we**”) for the financial year ending December 31, 2023 (the “**Reporting Period**”) and sets out 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 in Canada or elsewhere or of goods imported into Canada by the Corporation.

This Report constitutes the first report prepared by the Corporation pursuant to Canada’s new *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

1. Measure to prevent and reduce risks of forced labour and child labour

As part of our new suppliers onboarding process, our suppliers have to confirm in writing that they will comply with our Supplier Code which includes a section on slavery, human trafficking and labor exploitation.

2. Structure, activities and supply chains

The Corporation began operations in January 1991, when Walsh Automation Inc. created a division dedicated to improving the effectiveness of forensic science through the application of automation technologies. Today the Corporation with its affiliated companies operating in the field of ballistics, employs approximately 250 people worldwide in a variety of disciplines including engineering, forensic science, information technology and public safety - all committed to providing ballistic identification solutions.

With IBIS (Integrated Ballistics Identification System), the Corporation has accumulated more than 25 years of world-class experience in recognizing the unique markings imprinted on cases and projectiles of different types by thousands of weapons of various models and calibers and has developed a series of robust algorithms capable of sifting through thousands of similar samples to propose the most likely match candidates to ballistics experts. Our investment in the development of automated acquisition techniques, high-performance correlation algorithms and intuitive analysis tools is led by a team of highly skilled scientists recognized for their in-depth knowledge in the field of forensic ballistics.

Governments and agencies in 70 countries and territories count on the Corporation for reliable, cost-effective solutions to solve firearms-related crime and promote a safer society. To provide immediate support, the Corporation and its affiliated companies operating in the field of ballistics affiliates have offices around the world located in the following cities:

- Montreal, Quebec, Canada (head office and training center)
- Largo, Florida, USA (customer support and training center)
- Dublin, Ireland (customer support)
- Pretoria, South Africa (customer support)
- Bangkok, Thailand (customer support)
- Mexico City, Mexico (customer support)
- Dubai, UAE (representative office)
- Delhi, India (representative office)

The Corporation is incorporated under the federal laws of Canada and is part of the LeadsOnline group, a company headquartered in Plano, Texas.

3. Policies, Governance and Due Diligence processes

3.1 Code of Ethics

The Code of Ethics applies to all FT employees and whoever represents FT.

It addresses ethical conduct in our work environment, business practices and relationships with external stakeholders. The principles set out in the Code of Ethics reflect the Corporation's belief that honesty and integrity foster a positive work environment that strengthens the confidence of all stakeholders. The Code of Ethics details the standards of behaviour expected from everyone to whom it applies in their daily activities and in dealings with others. It also outlines the key responsibilities of the Corporation leaders who are to provide a model of high standards of ethical conduct and to create a work environment reflecting both the content and the spirit of the Code of Ethics.

Our Supplier Code of Ethics specifically includes (on page 22) an obligation to ensure that all FT employees and whoever represents FT abide by best business practices by:

“Ensuring that our suppliers and other partners also operate with integrity and to high ethical standards. This includes those relating to Health and Safety, forced or child labour and environmental standards.”

3.2 Supplier Code of Conduct (the “Supplier Code”)

In line with the Corporation's vision for its suppliers, the Corporation actively engages its supply chain by the adherence of its suppliers to its Supplier Code. The Supplier Code details our expectations of suppliers in respect of several matters, including anti-bribery and corruption, conflicts of interests, diversity and inclusion, health and safety, fair pay and benefits, responsibly sourced materials and overall compliance with applicable laws.

Our Supplier Code specifically includes (on page 12) provisions prohibiting child labour and forced labour, as follows:

“Forensic Technology (Canada) Inc. believes that all employment should be freely chosen. Forensic Technology (Canada) Inc. opposes all forms of slavery, human trafficking and labor exploitation. These are criminal offences in many countries, and we have a duty to prevent such practices. We will not accept child labor or any practice that inhibits the development of children.”

Specifically, this policy dictates to our suppliers the following conditions:

- *Never using involuntary labor of any type including forced, prison or debt-bonded labor.*
- *Never using or supporting practices that inhibit the development of children.*
- *Never employing anyone under the age of sixteen (16) years or, where it is higher, the mandatory national school leaving age.*
- *Ensuring workers have access to legal representation and advice where appropriate.*
- *Complying with applicable labor, employment and modern slavery laws including minimum living wages and maximum working hours.”*

3.3 Third Party Due Diligence

While improving operational efficiency, we continue to strengthen our processes to reduce risks related to forced and child labour. The Corporation intends to take measures to strengthen its existing Third-Party Due Diligence process by enhancing its ability to identify and mitigate risks associated with its supply chain.

3.4 Speak-up and Whistleblower Policy

In accordance with our Code of Ethics and our Whistleblower Policy, should employees have concerns regarding forced or child labour, they have a responsibility to report their suspicions.

To that effect, the Corporation provides multiple channels for employees to report any potential breach, on a confidential basis if desired:

- Website: forensictechnology.ethicspoint.com
- Mobile-friendly website: forensictechnologymobile.ethicspoint.com
- Toll-free number:
 - Canada: 844-858-0853
 - Ireland: 1800772266
 - South Africa: 080 001 0731
 - Thailand: 1800018146
 - United States: 844-858-0851

4. Assessing and managing our risk

As a company that offers solutions mainly through equipment and software, the Corporation believes that there is a limited chance of internal operations being directly linked to modern slavery practices.

As we do not, however, have visibility on certain parts of our supply chain, the Corporation recognizes that there is a risk that it may unknowingly be linked to such practices. Such risks may be present due to the purchase of parts from suppliers that are incorporated in the equipment that we manufacture.

As a result, we have implemented a screening process for all suppliers prior to onboarding, which would identify any major risks including breach of modern slavery laws.

5. Remediation Measures

Our Whistleblower Policy, Code of Ethics and Supplier Code offer a reporting mechanism for our employees and suppliers to report ethical or legal violations, among other concerns. If a situation of non-compliance is identified, the Corporation will work to develop and implement a corrective plan to improve and remedy the situation.

6. Training

The Corporation's employees receive regular tailored training on ethical topics and our policies. All new office employees are assigned a mandatory onboarding training package which includes training on our Code of Ethics and our Whistleblower Policy.

On an annual basis, all office employees are required to certify their understanding and conformity with our Code of Ethics.

7. Assessing effectiveness


The Corporation has in place a number of measures to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains. While we have not yet taken any actions to assess the effectiveness of those actions, the Corporation intends to assess its effectiveness in preventing and reducing risks of forced labour and child labour in its activities and supply chains at a later stage.

8. Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of the Corporation.

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 entity 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 Forensic Technology (Canada) Inc.

Per: 
Full Name: Alvaro Venegas
Title: President and Director
Date: May 30 2024