



Handgards[®] LLC

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April 25, 2024

RE: Handgards Compliance with Canada S211

To Whom It May Concern:

In accordance with the requirements of the Act, in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity 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.

I have the authority to bind the company.

A handwritten signature in dark ink, appearing to read "Joe Kubicek". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Joseph Kubicek
CEO



Identifying Information

Please note that information entered in any open text box field could be deemed identifiable depending on information provided. In order to protect privacy, entities and government institutions must not add personal information of any kind in these open text areas.

*This report is for which of the following?

Entity	<input checked="" type="radio"/>
Government institution	<input type="radio"/>

*Legal name of reporting entity or government institution:

HANDGARDS LLC

*Financial reporting year (Start Date):

Month	January	▼
Day	1	▼
Year	2023	▼

***Financial reporting year (End Date):**

Month	December
Day	31
Year	2023

***Is this a revised version of a report already submitted this reporting year?**

Yes

No

Business number(s) (if applicable):

869429837RM0001

***Is this a joint report?**

Yes

No

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

Yes

No

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

Listed on a stock exchange in Canada

Canadian business presence (select all that apply):

Has a place of business in Canada

Does business in Canada

Has assets in Canada

Meets size-related thresholds (select all that apply):

Has at least \$20 million in assets for at least one of its two most recent financial years

Has generated at least \$40 million in revenue for at least one of its two most recent financial years

Employs an average of at least 250 employees for at least one of its two most recent financial years



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

Agriculture, forestry, fishing and hunting



Mining, quarrying, and oil and gas extraction



Utilities



Construction



Manufacturing



Wholesale trade



Retail trade



Transportation and warehousing



Information and cultural industries



Finance and insurance



Real estate and rental and leasing

Professional, scientific and technical services

Management of companies and enterprises

Administrative and support, waste management and remediation services

Educational services

Health care and social assistance

Arts, entertainment and recreation

Accommodation and food services

Other services (except public administration)

Public administration

Other, please specify:

***In which country is the entity headquartered or principally located?**

United States of America 

Annual Report

***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.**

Mapping activities	<input type="checkbox"/>
Mapping supply chains REF EXHIBIT A, B	<input checked="" type="checkbox"/>
Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains REF EXHIBIT C	<input checked="" type="checkbox"/>
Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains	<input checked="" type="checkbox"/>
Developing and implementing an action plan for addressing forced labour and/or child labour	<input checked="" type="checkbox"/>

Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily

Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour

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

Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour

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

Developing and implementing child protection policies and processes

Developing and implementing anti-forced labour and/or -child labour contractual clauses

Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists

Auditing suppliers

Monitoring suppliers

Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour

Developing and implementing grievance mechanisms

Developing and implementing training and awareness materials on forced labour and/or child labour

Developing and implementing procedures to track performance in addressing forced labour and/or child labour

Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour

Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks

Information not available for this reporting period

Other, please specify:

Please provide additional information describing the steps taken (if applicable) (1500 character limit).

Reference Exhibits A, B for example of Supply Chain Mapping for point 2 of previous section.

Reference Exhibit C for example of CBP Withhold Orders and Findings page for point 3 of previous section.

***Which of the following accurately describes the entity's structure?**

Corporation	<input type="checkbox"/>
Trust	<input type="checkbox"/>
Partnership	<input checked="" type="checkbox"/>
Other unincorporated organization	<input type="checkbox"/>

***Which of the following accurately describes the entity's activities? Select all that apply.**

Producing goods (including manufacturing, extracting, growing and processing)

in Canada	<input type="checkbox"/>
outside Canada	<input checked="" type="checkbox"/>

Selling goods

in Canada	<input checked="" type="checkbox"/>
outside Canada	<input checked="" type="checkbox"/>

Distributing goods

in Canada	<input checked="" type="checkbox"/>
outside Canada	<input checked="" type="checkbox"/>
Importing into Canada goods produced outside Canada	<input checked="" type="checkbox"/>
Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada	<input type="checkbox"/>

***Has the organization identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.	<input checked="" type="radio"/>
Yes, we have started the process of identifying risks, but there are still gaps in our assessments.	<input type="radio"/>
No, we have not started the process of identifying risks.	<input type="radio"/>

***Does the organization currently have policies and due diligence processes in place related to forced labour and/or child labour?**

Yes

No

***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.**

Embedding responsible business conduct into policies and management systems
REF EXHIBIT D

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

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).

Reference Exhibit D for point 1 of previous section.

***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.**

The sector or industry it operates in



The types of products it produces, sells, distributes or imports



The locations of its activities, operations or factories



The types of products it sources



The raw materials or commodities used in its supply chains



Tier one (direct) suppliers



Tier two suppliers



Tier three suppliers



Suppliers further down the supply chain than tier three

The use of outsourced, contracted or subcontracted labour

The use of migrant labour

The use of forced labour

The use of child labour

None of the above

Other, please specify:

***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.**

Agriculture, forestry, fishing and hunting

Mining, quarrying, and oil and gas extraction

Utilities

Construction

Manufacturing



Wholesale trade



Retail trade



Transportation and warehousing



Information and cultural industries



Finance and insurance



Real estate and rental and leasing



Professional, scientific and technical services



Management of companies and enterprises



Administrative and support, waste management and remediation services



Educational services



Health care and social assistance



Arts, entertainment and recreation



Accommodation and food services



Other services (except public administration)

Public administration

None of the above

Other, please specify:

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

Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.

Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

No, we have not taken any remediation measures.

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

***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?**

Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.

Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

No, we have not taken any remediation measures.

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.

***Does the organization currently provide training to employees on forced labour and/or child labour?**

Yes

No

***If yes, is the training mandatory?**

Yes, the training is mandatory for all employees.	<input type="radio"/>
Yes, the training is mandatory for employees making contracting or purchasing decisions.	<input checked="" type="radio"/>
Yes, the training is mandatory for some employees.	<input type="radio"/>
No, the training is voluntary.	<input type="radio"/>

***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?**

Yes	<input checked="" type="radio"/>
No	<input type="radio"/>

***If yes, what method does the organization use to assess its effectiveness? Select all that apply.**

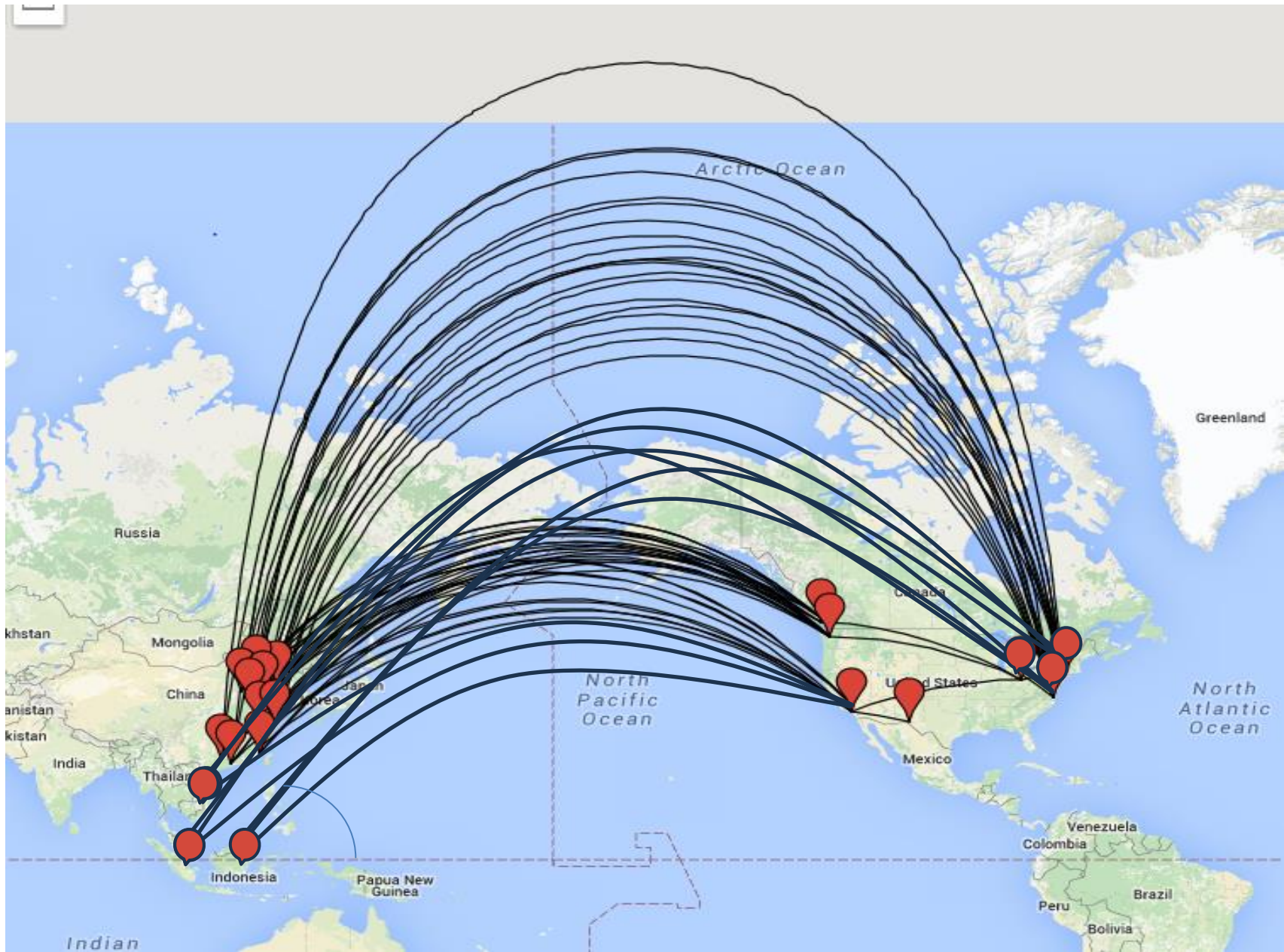
Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour	<input type="checkbox"/>
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Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses

Partnering with an external organization to conduct an independent review or audit of the organization's actions

Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators

Other, please specify:



BUSINESS PARTNER (Foreign Supplier/Ocean Carrier):

Importer Destination:

CARGO/DATA FLOW AND PARTNERS

Note: Please ensure that every business partner in the supply chain is accounted for. Please insert row for carriage or handling that is subcontracted by a business partner within this supply chain.

Partner Role	Partner Company Name	Process	Cargo Movement - if applicable	Name, Phone, Email, Address of main contact for Partner	C-TPAT Compliant? (Yes/No/Unknown)	Days cargo is "At Rest" at this stage	Transport Mode	If entity physically handles cargo, who selects them as a provider?
Foreign Manufacturer								
Freight Broker and Export Broker								
Foreign Carrier								
Consolidator								
U.S. Port of Entry								
Drayage								
Warehouse / Deconsolidator								
U.S. Carrier								
U.S. Terminal								
U.S. Customs Broker								
U.S. Distribution Center / Consignee								

Instructions:

Partner role: Please list description of partner's role in the supply chain (forwarder, carrier, broker, etc.)

Partner Company Name: Include the full legal name of the business partner

Process: Describe how business partner completes their responsibilities (i.e. production, packing, document production, transportation, storage, etc.)

Cargo Movement: Explain how business partner prepares the goods and handles movement (i.e. moving goods from point A to point B, point of departure, etc.)

Contact details of Partner: List contact information for location where the goods are handled or documents are processed.

C-TPAT Compliant: Indicate whether Partner is C-TPAT compliant. If yes, include SVI number.

[Company](#)
[Address](#)
[Address](#)
[Phone](#)

ENVIRONMENTAL AND SOCIAL RESPONSIBILITY POLICIES

OUR COMPANY IS COMMITTED TO EXHIBITING LEADERSHIP IN ENVIRONMENTAL AND SOCIAL AFFAIRS IN ALL OF ITS BUSINESS ACTIVITIES. THE REQUIREMENTS LISTED BELOW APPLY TO ALL OF THE COMPANY'S OPERATIONS. THE COMPANY SHALL SEEK TO ENFORCE THESE POLICIES TO THE EXTENT FEASIBLE, TAKING INTO CONSIDERATION THE MARKET, NEEDS OF THE COMPANY, NEEDS OF THE CUSTOMERS, COMMUNITY EXPECTATIONS, AND OTHER RELEVANT FACTORS.

ENVIRONMENTAL RESPONSIBILITY POLICY

GENERAL

- MEET OR EXCEED ALL APPLICABLE ENVIRONMENTAL LEGAL REQUIREMENTS FOR ALL COMPANY ACTIVITIES, PRODUCTS, AND SERVICES.
- BE AN ENVIRONMENTALLY RESPONSIBLE NEIGHBOR IN THE COMMUNITIES WHERE THE COMPANY OPERATES AND ACT PROMPTLY AND RESPONSIBLY TO CORRECT INCIDENTS OR CONDITIONS THAT ENDANGER HEALTH, SAFETY, OR THE ENVIRONMENT.

PREVENTION & LEADERSHIP

- RECOGNIZE THAT POLLUTION PREVENTION, BIODIVERSITY, AND RESOURCE CONSERVATION ARE KEY TO A SUSTAINABLE ENVIRONMENT AND SEEK TO INTEGRATE THESE CONCEPTS INTO THE COMPANY'S BUSINESS DECISION-MAKING.
- CONSERVE NATURAL RESOURCES BY REUSING AND RECYCLING MATERIALS, PURCHASING RECYCLED MATERIALS, AND USING RECYCLABLE PACKAGING AND OTHER MATERIALS WHERE FEASIBLE.
- UTILIZE PRODUCTS THAT ARE SAFE FOR THEIR INTENDED USE, ENERGY EFFICIENT, PROTECTIVE OF THE ENVIRONMENT, AND REUSABLE OR RECYCLABLE.
- UTILIZE PROCESSES THAT DO NOT ADVERSELY AFFECT THE ENVIRONMENT, INCLUDING DEVELOPING AND IMPROVING OPERATIONS AND TECHNOLOGIES TO MINIMIZE WASTE, PREVENT AIR, WATER, AND OTHER POLLUTION, MINIMIZE HEALTH AND SAFETY RISKS, AND DISPOSE OF WASTE SAFELY AND RESPONSIBLY.
- ENSURE THE RESPONSIBLE USE OF ENERGY THROUGHOUT THE COMPANY'S BUSINESS, INCLUDING CONSERVING ENERGY, IMPROVING ENERGY EFFICIENCY, AND GIVING PREFERENCE TO RENEWABLE OVER NON-RENEWABLE ENERGY SOURCES WHEN FEASIBLE.
- ASSESS THE ENVIRONMENTAL CONDITION OF THE COMPANY'S PROPERTY INTERESTS AND APPROPRIATELY ADDRESS THE ENVIRONMENTAL IMPACTS CAUSED BY THESE PROPERTIES.
- MINIMIZE THE ENVIRONMENTAL RISKS TO EMPLOYEES AND COMMUNITIES IN WHICH THE COMPANY OPERATES.

CONTINUED IMPROVEMENT

- STRIVE TO CONTINUALLY IMPROVE THE COMPANY'S ENVIRONMENTAL MANAGEMENT SYSTEM AND RELATED POLICY, PROGRAMS, AND PERFORMANCE BASED ON THE RESULTS OF PERIODIC REVIEWS AND TAKING INTO ACCOUNT REGULATORY CHANGES, COMPANY NEEDS, CUSTOMER NEEDS, TECHNICAL DEVELOPMENTS, SCIENTIFIC UNDERSTANDING, AND COMMUNITY EXPECTATIONS.
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SOCIAL RESPONSIBILITY POLICY

GENERAL

- MAINTAIN THE HIGHEST STANDARDS OF INTEGRITY AND CORPORATE GOVERNANCE PRACTICES TO ENSURE EXCELLENCE IN DAILY OPERATIONS AND TO PROMOTE CONFIDENCE IN THE COMPANY'S GOVERNANCE SYSTEMS.
- CONDUCT BUSINESS IN AN OPEN, HONEST, AND ETHICAL MANNER.
- RECOGNIZE THE IMPORTANCE OF PROTECTING ALL OF THE COMPANY'S HUMAN, FINANCIAL, PHYSICAL, INFORMATIONAL, SOCIAL, ENVIRONMENTAL, AND REPUTATIONAL ASSETS.
- ADVISE THE COMPANY'S PARTNERS, AND SUPPLIERS OF ITS SOCIAL RESPONSIBILITY POLICY AND WORK WITH THEM TO ACHIEVE CONSISTENCY WITH THIS POLICY.

STAKEHOLDER RELATIONS

- ENGAGE STAKEHOLDERS CLEARLY, HONESTLY, AND RESPECTFULLY.
- COMMITTED TO TIMELY AND MEANINGFUL DIALOGUE WITH ALL STAKEHOLDERS, INCLUDING BUT NOT LIMITED TO SHAREHOLDERS, CUSTOMERS, AND EMPLOYEES, LOCAL COMMUNITIES, GOVERNMENTS, REGULATORS, AND LANDOWNERS.

EMPLOYEE RELATIONS

- PROVIDE A SAFE AND HEALTHY WORKPLACE AND ENSURE THAT EMPLOYEES ARE PROPERLY TRAINED.
- ENSURE THAT EMPLOYEES AND WORKPLACES HAVE APPROPRIATE SAFETY AND EMERGENCY EQUIPMENT.
- TREAT EMPLOYEES FAIRLY AND WITH DIGNITY, TAKING THEIR GOALS AND ASPIRATIONS INTO CONSIDERATION.
- EMBRACE DIVERSITY IN THE WORKPLACE.
- APPLY FAIR LABOR PRACTICES WHILE RESPECTING THE NATIONAL AND LOCAL LAWS OF THE COUNTRIES AND COMMUNITIES IN WHICH THE COMPANY OPERATES.
- PROVIDE EQUAL OPPORTUNITY IN ALL ASPECTS OF EMPLOYMENT AND NOT ENGAGE IN OR TOLERATE UNLAWFUL WORKPLACE CONDUCT, INCLUDING DISCRIMINATION, INTIMIDATION, OR HARASSMENT.
- ALL EMPLOYEES ARE RESPONSIBLE AND ACCOUNTABLE FOR CONTRIBUTING TO A SAFE WORKING ENVIRONMENT, FOR FOSTERING SAFE WORKING ATTITUDES, AND FOR OPERATING IN A SOCIALLY RESPONSIBLE MANNER.

HUMAN RIGHTS

- STRIVE TO WORK WITH GOVERNMENTS AND AGENCIES TO SUPPORT AND RESPECT HUMAN RIGHTS WITHIN THE COMPANY'S SPHERE OF INFLUENCE.
- NO TOLERANCE FOR HUMAN RIGHTS ABUSES AND REFUSAL TO ENGAGE OR BE COMPLICIT IN ANY ACTIVITY THAT SOLICITS OR ENCOURAGES HUMAN RIGHTS ABUSE.

- STRIVE TO BUILD TRUST, DELIVER MUTUAL ADVANTAGE, AND DEMONSTRATE RESPECT FOR HUMAN DIGNITY AND RIGHTS IN ALL RELATIONSHIPS THE COMPANY ENTERS INTO, INCLUDING RESPECT FOR CULTURES, CUSTOMS, AND VALUES OF INDIVIDUALS AND GROUPS.

COMMUNITY

- ENCOURAGE AND PROMOTE COLLABORATIVE, CONSULTATIVE, AND PARTNERSHIP APPROACHES IN COMMUNITY INVESTMENT PROGRAMS.
- SEEK OPPORTUNITIES TO CONTRIBUTE TO LOCAL COMMUNITIES' QUALITY OF LIFE BY SUPPORTING INNOVATIVE PROGRAMS IN HEALTH, EDUCATION, SOCIAL SERVICES, AND THE ENVIRONMENT, AS WELL AS CULTURAL AND CIVIC PROJECTS.
- STRIVE TO PROVIDE EMPLOYMENT AND ECONOMIC OPPORTUNITIES IN THE COMMUNITIES IN WHICH THE COMPANY OPERATES.

CONTINUED IMPROVEMENT

- STRIVE TO CONTINUALLY IMPROVE THE COMPANY'S SOCIAL MANAGEMENT SYSTEM AND RELATED POLICY, PROGRAMS, AND PERFORMANCE BASED ON THE RESULTS OF PERIODIC REVIEWS AND TAKING INTO ACCOUNT REGULATORY CHANGES, COMPANY NEEDS, CUSTOMER NEEDS, TECHNICAL DEVELOPMENTS, SCIENTIFIC UNDERSTANDING, AND COMMUNITY EXPECTATIONS.

Corporate strategies, policies and guidelines must support this commitment to leadership in environmental and social affairs. Every employee and contractor of the Company must follow this policy and report any concerns to Company management. Management is expected to take prompt corrective action.
