



COUNCIL RESOLUTION

Title:	Squamish Nation Modern Slavery Act Report 2023/24
Resolution No.	24120
Subject:	Approval of Squamish Nation Modern Slavery Act Report for fiscal year 2023/24.
Moved By:	Councillor Shayla Jacobs – Sumkwaht
Seconded By:	Councillor Stewart Gonzales – Sempúlyan
Meeting Held At:	320 Seymour Blvd, North Vancouver, BC, V7J 2J3
Meeting Date:	2024-05-30


WHEREAS,

- A. As required under the Public Safety Canada legislation “Fighting Against Forced Labour and Child Labour in Supply Chains Act (Supply Chains Act)”, entities meeting applicable criteria must publish a report each financial year that discloses the steps they have taken to prevent and reduce the risk that forced labour or child labour is used in their operations and/or supply chains;
- B. As Squamish Nation meets the criteria, staff have prepared the Modern Slavery Act Report for the 2023/24 fiscal year in accordance with requirements set out by Public Safety Canada; and
- C. To comply with the Public Safety Canada legislation, Squamish Nation Council (“**Council**”) has reviewed the Modern Slavery Act Report for the 2023/24 fiscal year (attached).

THEREFORE, BE IT RESOLVED THAT:

- 1. Council accepts and approves the Modern Slavery Act Report for the 2023/24 fiscal year for submission and publication to the Squamish Nation website.

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Councillor Deborah Baker
K'ana



Councillor Stewart Gonzales
Sempúyan



Councillor Shayla Jacobs
Sumkwaht

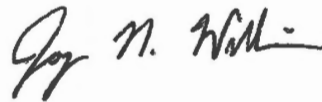


Chairperson Dustin Rivers
Sxwchálten iy Xelsílem

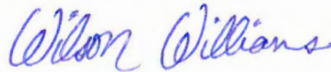


Councillor Kristen Rivers
Tiyáltelut

Councillor Ann Whonnock
Syexwáliya



Councillor Joyce Williams



Councillor Wilson Williams
Sxwíxwtn

A quorum of the Squamish Nation Council consists of the Chairperson & four (4) Councillors.



Skwxwú7mesh Úxwumixw

Squamish Nation

Modern Slavery Act Report (Fiscal Year 2024)

Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) requires that entities describe actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This is a joint report for Squamish Nation (the “Nation”). This report refers to the 2024 fiscal year end, being March 31, 2024.

At the Nation, advancing social equity is a key focus. We recognize our responsibility to respect and protect the human rights of all people who support and interact with our Nation, comprised of Nation members, employees, suppliers and customers. Our Nation members trust that the programs we deliver are supported by suppliers that provide safe, fair, and ethical working conditions for their workers. As such, we expect our business partners and suppliers (as well as their contractors, agents, subcontractors, sub-agents and labour agencies) to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

Squamish Nation Structure, Activities and Supply Chains

Structure

Squamish Nation, a Canadian First Nations government, was formed in July 1923. The registered office for the Nation is 320 Seymour Boulevard, North Vancouver, BC, Canada V7J 2J3. The Nation is divided into four divisions as follows:

- K’iyáxan Ch’áwch’aw (Community Services)
- Nexwníwmain Ch’áwch’aw (Territory & Culture Services)
- Nexwnínlhewá7nem Ch’áwch’aw (People Services)
- Xetxítayus Ch’áwch’aw (Corporate Services)

Activities

Squamish Nation is responsible for overseeing the management of assets and revenues generated within its jurisdiction, aimed at serving the needs of the Squamish People. This entails the provision of various programs and services tailored to the community's requirements, spanning various sectors such as healthcare, education, cultural preservation, and economic development. Additionally, the Nation acts as the primary representative of its people in fostering relationships and engaging in diplomatic exchanges with other Canadian governmental bodies and industries that operate within its territorial boundaries. This role involves advocating for the interests and rights of the Squamish People, ensuring their voices are heard and respected in intergovernmental discussions and collaborative endeavors aimed at promoting mutual understanding, sustainable development, and the preservation of cultural heritage.

Governance

The Nation is composed of an elected Council including one Chairperson and seven Councillors, an elected Band Manager, and a Nation Administration overseen by the Chief Administrative Officer. The Nation has a robust governance structure in place to ensure our Human Rights programs, policies and practices are operationalized and effective. Entity-wide oversight is provided by the Strategic Priorities and Budget Committee (“SPBC”) whose mandate is development and implementation of the Nation’s enterprise risk management. Specifically, the SPBC is to monitor significant risks to Squamish Nation’s operations and make recommendations to the Council on proposed plans to

mitigate the risks identified or, where appropriate, to manage or transfer those risks.

Supply Chain

A supply chain refers to an entity's 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. The Nation does not operate under the traditional supply chain model. The majority of the Nation's operations include delivering programs and services rather than physical products. In the Nation's case, the supply chain entails acquiring the necessary resources and capabilities to effectively deliver services.

Operating under mostly a service-based model, selection of vendors is undertaken with careful consideration not only for quality and cost-effectiveness but also for the ethical practices. Ongoing development is underway within the Nation's procurement practices, including centralization of purchasing.

Squamish Nation policies and due diligence processes in relation to forced labour and child labour

The Nation engages with suppliers through various procurement vehicles such as competitive tenders, sole source procurement, or direct awards. Each of these procurement vehicles have special provisions or controls to uncover forced labour and child labour.

1. *Competitive tenders*: Depending on the good or service the Nation procures through a competitive tender. For example, the Nation requires finance modernization consulting services. The Nation developed RfX and contract documents requires that each bidder would provide the names and qualifications of each member of their proposed team, who would be working directly with the Nation for the engagement. The Nation would review the resumes of each of the proposed team member to ensure the qualifications of that team member is compliant with relevant employment legislation.
2. *Sole Source/Direct Awards*: The Nation's contracts require that suppliers or the supplier's project team are individually listed in the contract. The supplier would also provide information regarding their project teams qualifications, and how they are connected with the supplier (i.e., direct employment, or contractor). The Nation does not allow assignments or subcontracting of any services, unless such subcontracting request is assessed by the Nation.

Colleague Code of Conduct

The Nation's Code of Conduct policy (the "Code") reflects our values of respect, integrity, dedication, and accountability. Central to the Code is the promotion of a human rights-conscious environment, where every individual within the organization is encouraged to adopt a perspective that prioritizes the protection and advancement of human rights. This entails not only adhering to legal mandates but also proactively seeking opportunities to integrate human rights considerations into daily business practices and decision-making processes.

The Human Resources Department oversees the implementation, enforcement, and regular updates of the Code, ensuring its alignment with evolving legal standards, societal expectations, and internal best practices.

Supplier Code of Conduct and Contractual Obligations

Currently, no supplier code of conduct exists, however the Nation has the following provisions in their contract documents:

1. *Representation and Warranties*: all information, statements, documents and reports furnished or submitted by the supplier to the Nation in connection with a contract are in all material respects true and correct, and that the supplier holds all permits, licenses, approvals and statutory authorities issued by any government or government agency that are necessary for the performance of the supplier's obligations under the contract, and that the supplier maintains all permits, licenses, approvals and statutory authorities issued by any government or government agency that are necessary for the performance of the supplier's obligations under the contract
2. *Assignment*: The supplier must not assign any of the supplier's rights or obligations under a contract without the Nation's prior written consent. Upon providing written notice to the supplier, the Nation may assign to any person any of the Nation's rights under the contract and may assign to any "government corporation", as defined in the Financial Administration Act, or any related entity, any of the Nation's obligations under the contract.
3. *Subcontracting*: The supplier must not subcontract any of the supplier's obligations under the contract to any person without the Nation's prior written consent. No subcontract, whether consented to or not, relieves the supplier from any obligations under this Agreement. Approved subcontractors must comply with the contract in performing the subcontracted obligations.

Whistleblowing Policy

The Nation has a Whistleblowing Policy for which the purpose is to facilitate the disclosure of wrongdoing that is contrary to the interest of the Nation. The policy sets out guidelines for the reporting and investigation of serious misconduct where there are no procedures in place for doing so and provides protection from retaliation to those who report serious misconduct in good faith.

The protocol for reporting serious misconduct within the organization is designed to ensure transparency, accountability, and fairness in addressing such matters. Employees are entrusted with a significant responsibility to promptly report any instances of serious misconduct they become aware of, thereby upholding the integrity and ethical standards of the organization.

Enterprise Risk Management

The enterprise risk management (ERM) process aims to support various sectors of the business in handling suitable levels of risk tolerance. It achieves this by employing a structured methodology and tools to assess, gauge, and oversee critical risks, encompassing aspects such as workplace health and safety and adherence to regulatory requirements. ERM serves as a foundational resource alongside other strategic business planning processes. These combined insights are instrumental in the identification of emerging risks within the companies' operational landscape.

Risk of forced labour or child labour being used and the steps we have taken to assess and manage that risk

At the Nation, we are aware that global supply chains present a risk of forced labour and child labour. Our proactive approach to risk management involves continuous monitoring and evaluation of our labour practices and business operations. Our approach involves thorough assessment to pinpoint areas where such risks may exist, whether within our own operations or within the networks of our direct or indirect suppliers. By regularly enforcing and assessing our processes and remaining vigilant to emerging challenges, we ensure our commitment to upholding human rights and ethical standards.

Remediation of any forced labour or child labour

To date, no instances of forced labour or child labour have been identified within our activities and supply chains at the Nation. However, in the event that any such occurrences are discovered they would be addressed through our established incident management and escalation process in our Code.

Remediation of 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

To date there have been no identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

Training

In accordance with federal Legislation on Harassment and Violence Prevention, the Nation is required to provide mandatory Respectful Workplace training for all employees including, temporary and seasonal workers. This training covers the following topics:

- Elements of the Squamish Nation Respectful Workplace Policy
- The Relationship between harassment, violence and human rights protections under the Canadian Human Rights Act, specifically including Discriminatory Harassment;
- How to recognize, minimize and prevent harassment and violence;

The Nation is constantly updating training programs to align with legislation and other operational needs. Respectful Workplace training is facilitated by external consultants and Nation employees are required to re-take it every three years.

Effectiveness assessment

To reduce and prevent the risk of forced and child labour within our operations and supply chains, we assess the effectiveness of our actions to continuously improve our efforts to fight against forced labour and child labour.

Activity	Measuring Effectiveness
Governance	<ul style="list-style-type: none"> · Periodic review of Code of Conduct and review of contract templates, as required, to address mitigation of modern slavery risk · Due diligence applied to vendor selection assessed by results of due diligence procedures in RFPs · Required training for all levels of employees tracked by attendance
Engagement	<ul style="list-style-type: none"> · Senior management participation and engagement on human rights efforts · Prioritization of ESG to ensure commitment and accountability · Engagement with industry peers to continuously improve policies and practices
Monitoring	<ul style="list-style-type: none"> · Tracking of corrective actions and remediation of any forced or child labour risks identified · Monitoring media reports related to risk of forced or child labour and actioning as required

Approval and Attestation

The Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Council of Squamish Nation.

In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for the entity or entities listed above. Based on our knowledge, and having exercised reasonable diligence, we 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.