



**Annual Report  
on**

**Fighting Against Forced Labour and  
Child Labour in Supply Chains Act**

(commonly referred to as the Modern Slavery Act)

**Reporting Period:  
April 1, 2024 – March 31, 2025**

## 1. INTRODUCTION

The Salvation Army remains committed to eliminating all forms of modern slavery, including forced labour and child labour, from its operations and supply chains. Rooted in the principles of transparency, accountability and continuous improvement, The Salvation Army is continually aligning its practices, policies and processes in accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”).

This report outlines the ongoing measures and initiatives undertaken by The Salvation Army over the past fiscal year as part of its continuous compliance efforts with the Act. As one of Canada’s largest non-governmental direct providers of social services, The Salvation Army maintains a strong commitment to human rights, social justice and the protection of vulnerable populations. These values continue to guide its operations and inform its approach to ethical sourcing and procurement.

While a formal policy was introduced in the previous reporting period, this year The Salvation Army has further strengthened its commitment to ethical supply chain practices through the introduction of a Supplier Code of Conduct. This code establishes clear expectations for suppliers, contractors and service providers, requiring adherence to internationally recognized labour standards and human rights principles. It is designed to promote ethical behaviour across the supply chain and support The Salvation Army’s efforts to mitigate the risks of forced and child labour. Through the adoption of the Supplier Code of Conduct and its ongoing engagement with suppliers, The Salvation Army continues to demonstrate its commitment in ethical sourcing and social responsibility.

As outlined in last year’s report, The Salvation Army introduced a range of strategic initiatives towards combating modern slavery and human trafficking (MSHT). These efforts included the launch of a National Fight for Freedom Strategy focused on education, prevention, support for survivors and advocacy. The Salvation Army also introduced a modern slavery and human trafficking certificate program for staff members. Additional awareness was raised through targeted workshops, webinars and internal employee training, all aimed at strengthening organizational understanding and accountability. These initiatives reflect The Salvation Army’s enduring mission to promote human dignity and confront exploitation in all its forms.

Over the past fiscal year, The Salvation Army’s commitment and desire to combat modern slavery and human trafficking in Canada deepened and found new expressions. It was a year of meaningful impact, new opportunities and immense expansion.

As the territorial modern slavery and human trafficking response (MSHTR) committee completed their fourth year of engaging in The Salvation Army Fight For Freedom strategy and priorities, The Salvation Army focused on transformation and developing an integrated approach in our work. This meant embracing humility, engaging in collective remembrance and intentionally placing our eyes on God and his goodness while walking and working through the challenges and complexities

of what The Salvation Army does. It has been an amazing journey of learning, celebrating, adapting, pressing in and focusing.

In Canada, The Salvation Army is committed to serving people who are at risk and have lived experience, their families and friends, and reducing the demand. Through our established and well-respected survivor engagement, support and recovery programs, The Salvation Army provides ongoing support and services including:

- Victim Advocacy
- Crisis/Emergency Intervention
- Safety Planning
- Short and Long-Term Housing Supports
- Trauma Informed Care
- Survivor Peer Support
- Access Legal Assistance
- Life Skills Training
- Economic Training
- Education and Training
- Survivor Led Case Management
- Mental Health and Addictions Support
- Sex Buyer Accountability Programs
- Prevention and Protection Work

To learn more about The Salvation Army’s modern slavery and human trafficking response and impact in 2024, visit: [2024 - MSHT Impact Report - TSA Canada & Bermuda](#).

## **2. Overview of Entities Subject to the Report**

### **(a) Structure, Activities and Supply Chains**

#### ***Structure***

The Salvation Army began its work in Canada in 1882, just 15 years after Confederation, and has grown to become one of the largest non-governmental direct providers of social services in the country. From the beginning, the Army in Canada adopted founder William Booth’s philosophy that there is little point preaching “salvation” to hungry people. And so, the concept of “soup, soap and salvation” took hold, later to be developed into the comprehensive social service programs The Salvation Army operates today—many of them in partnership with various levels of government.

The Governing Council of The Salvation Army in Canada is a federally incorporated corporation that was created by a special Act of Parliament in 1909. The general objects and purposes of the corporation are:

- the administration of the temporalities and management of property and real estate of The Salvation Army.
- to receive and hold both real and personal property, to execute trusts thereof.
- to enter, make, perform and carry out contracts consistent with the charitable, educational and religious purposes of The Salvation Army; and

- to take and hold by lease, gift, purchase, grant, devise, or bequest any property, real and personal, for the objects of the said corporation.

Accordingly, The Salvation Army as a corporation may, throughout Canada, establish, build, lease, maintain, manage and operate:

- (a) buildings and places for meetings, religious or secular, of The Salvation Army.
- (b) offices for the transaction of its business.
- (c) homes for its officers and, subject to provincial laws, schools, and colleges for their education and training.
- (d) emergency, transitional and supportive housing programs.
- (e) hospitals, hospices and long-term care homes.
- (f) emergency, transitional and supportive accommodation services for women and families.
- (g) childcare, preschools, camps and resource centres for families.
- (h) immigrant and refugee services.
- (i) generally, any buildings necessary for carrying out the charitable, educational, religious or other benevolent objects and purposes of The Salvation Army.

The Salvation Army in Canada operates 267 community churches, 231 thrift stores, and 110 diverse social service institutions. These include emergency shelters, addiction and mental- health programs, long-term care and supportive housing for seniors, childcare centres, residences for individuals with cognitive disabilities, and correctional and justice services programs. The Salvation Army is supported by 1,476 active and retired officers (clergy), nearly 43,000 church members, more than 90,000 active volunteers, and a dedicated workforce of over 9,000 employees. More than 40 Canadian officers and employees serve internationally in countries around the world.

### ***Activities***

The Salvation Army gives hope and support to vulnerable people today and serves more than 2.9 million people each year, in 400 communities across Canada and more than 133 countries around the world.

The Salvation Army offers practical assistance for children and families, often tending to the necessities of life, providing shelter for homeless people and rehabilitation for people struggling with addiction. When the public gives to The Salvation Army, they are investing in the future of marginalized and overlooked people in communities. As one of the largest non-governmental direct providers of social services in Canada, The Salvation Army provides unparalleled support to society's most vulnerable. Social and community service programs focus on nurturing the capacities, skills and strengths of individuals thus instilling in them a

sense of dignity.

The Salvation Army's Christmas kettle campaign has raised funds for more than 125 years to meet its demand for services. The campaign has grown into one of Canada's most significant and recognizable annual charitable events.

To accommodate the changing times, The Salvation Army in Canada continues to evolve. While the same values and goals still exist, new, innovative and effective programs, such as community kitchens, skills training and addictions day-treatment programs, are addressing rising issues in the communities.

Last year over three million visits were made to The Salvation Army for assistance and social services. Please find statistics for the services The Salvation Army provided in 2024.

### **Addictions and Mental Health, Rehabilitation and Shelter**

- **8,350** shelters, addictions, detox, mental-health, supportive housing, healthcare and corrections beds made available each night across all social programs.
- **2.05** million bed days (the use of a bed) were used in total for the year across all social programs.
- **272** people graduated from addictions and rehabilitation programs.
- **4.8** million community and shelter meals were distributed.

### **Community Services**

- **2.1 million** visits for food, clothing or practical assistance.
- **2,900** children and teens attended Salvation Army summer camps.

### **Emergency Disaster Services**

- **87,600** visits for assistance when disaster struck.

### **International Development**

- **94** projects in **30** countries.
- **5,600** children helped through Brighter Futures sponsorship program.

### **Additional Statistics**

- **51,300** interactions through street outreach.
- **16,000** people referred for housing.
- **7,000** people referred for employment.
- **73** individuals removed from human trafficking situations.

- **20,200** prison visits.
- **1.44 million** visits to community and family services for food and non-food services such as school supplies and baby products.
- **195,000** school meals provided.
- **104,000** nutritional snacks and other food items provided.
- **42,000** drop-in day program visits for developmental disabilities individuals and care givers.
- **10,500** interactions with people attending language training, settlement services and refugee services.
- **345,000** visits for Christmas assistance including food hampers and toys.
- **3,000** interactions through celebrate recovery programs that support people in recovery from substance use.
- **6,600** interactions through drop-in day programs that deal with mental health and recovery.
- **88,000** interactions with people attending programs through long-term care facilities and senior supportive housing units.
- **826,000** volunteer hours.

### ***Supply Chains***

#### Trade Canada and Bermuda Store

Over the past fiscal year, the Trade store has continued to fulfill its central role of sourcing essential products to support the mission of The Salvation Army in serving vulnerable communities. The store maintained its core product offerings, including brand wear, official uniforms, promotional items and supplies for churches and branches, such as kettle stands.

With the introduction of a new uniform policy, there has been a strategic shift in focus from brand wear to official uniforms. Uniform sourcing remains stable, supported by a strong relationship with a Canadian tailor who provides made-to-measure garments, including tunics, skirts and pants. Off-the-rack uniforms continue to be sourced from its counterpart in the United States, who maintains a long-standing relationship with a trusted supplier. Brand wear is still procured from established Canadian suppliers, who utilize manufacturing partners in China and the United Kingdom to produce items such as blouses and shirts.

#### OTHERS Global Program

In 2024, The Salvation Army continued to uphold its commitment to ethical sourcing through OTHERS Global, a program initiated by the Army and rooted in fair trade principles. This initiative is designed to combat poverty by creating dignified, fairly compensated employment opportunities, particularly for women, in communities across Kenya and Bangladesh. Through the production of handcrafted goods such as bags, scarves, jewelry and homeware, artisans

connected to the Army's community work gained access to global markets. The program not only expands the reach of socially responsible products but also reflects the Army's belief in the inherent dignity of all individuals. A strict code of conduct guides the initiative, emphasizing non-discrimination, transparency, anti-corruption and environmental responsibility to ensure ethical practices throughout the supply chain.

In support of the OTHERS Global program, The Salvation Army significantly increased its direct purchasing from artisan groups in Kenya and Bangladesh in 2024. This year's total spend on ethically sourced products from these two countries rose by over 400% compared to 2023. This substantial growth not only reflects the Army's deep commitment to fair trade and ethical sourcing but also directly contributes to sustainable livelihoods for the artisans involved. By expanding its investment in this program, the Army continues to affirm its role in advancing economic empowerment and social justice through meaningful market engagement.

### Ministry Unit Purchases

Building on last year's approach, The Salvation Army continued to allow individual ministry units to procure goods primarily through Canadian suppliers and online purchasing platforms. This decentralized model remains effective in ensuring operational efficiency and responsiveness to local needs. In many cases, these Canadian suppliers work with overseas manufacturers, which extends our supply chain beyond national borders. In reviewing purchasing activities for the past fiscal year, where goods were shipped from outside of Canada, the majority of these purchases originated from developed countries or were made via Canadian online platforms through our business account. These purchases largely involved non-high-risk industries and products. As part of our ongoing due diligence, we reviewed our first-tier suppliers and found no evidence of forced labour or child labour within these supply chains.

### **(b) Policies and Due Diligence Processes**

Last year, The Salvation Army updated its procurement policy to strengthen its commitment to addressing forced labour and child labour in supply chains. This policy established clear expectations for suppliers and contractors, aligning with the Army's values and standards. It introduced due diligence requirements, including risk assessment processes and engagement with suppliers to ensure alignment with ethical labour practices. The policy also outlined steps for investigation and response in cases where violations are identified.

In 2024, the Army's procurement team took a further step in strengthening ethical procurement practices by introducing a Supplier Code of Conduct. This code is now a mandatory requirement for all potential vendors prior to participating in any request for proposals (RFP) handled through the procurement team. It sets out the Army's standards in critical areas such as forced labour, child labour, human trafficking, modern slavery, wages and benefits, working hours, health and

safety and both working and living conditions. By requiring agreement to these standards at the outset, the Army ensures that any prospective business partner aligns with its ethical principles before a partnership begins. This marks a crucial step in embedding human rights protections directly into the procurement process and strengthening accountability across the supply chain.

**(c) Identification and Management of Risks**

For the fiscal year ending March 31, 2025, The Salvation Army maintained its established methodology for assessing risks related to forced labour and child labour within its supply chain. This approach involved analyzing direct supplier expenditures and identifying the countries in which those expenditures occurred. The Salvation Army utilized the [U.S. Department of Labor's Better Trade Tool](#) to identify high-risk countries. A detailed examination of supplier invoices was conducted, with a focus on expenditures by country. Expenditures related to travel (such as airfare, hotels, taxi and car rental) and transactions in US dollars, British pounds, Australian dollars and Euros were excluded from the risk review.

**Scope:** The scope of this year's risk assessment covered the fiscal period from April 1, 2024, to March 31, 2025. The assessment included a comprehensive review of The Salvation Army's direct supplier invoices paid through accounts payable, as well as corporate card transactions. This process enabled the collection and analysis of financial data to evaluate potential risks associated with supplier activities and international transactions.

**Findings:** As in the previous fiscal year, analysis of expenditures revealed that 96.7 percent of The Salvation Army's goods and services were sourced from Canadian suppliers, with 3.2 percent coming from suppliers located in low-risk countries such as the United States, Australia, the United Kingdom and various European nations. Only 0.05 percent of expenditures involved suppliers based in countries identified as high-risk by the Better Trade Tool. Further review of these expenditures, including invoice and corporate card transactions, did not identify any instances of high-risk goods or services.

**Conclusion:** Based on this year's risk assessment, the likelihood of The Salvation Army's supply chain being exposed to forced labour or child labour remains extremely low. The Salvation Army remains committed to strengthening its due diligence processes by continuing to develop supplier assessments, policies, monitoring mechanisms and periodic reviews aimed at reinforcing ethical sourcing and compliance with human rights standards.

**(d) Remediation Measures**

As The Salvation Army has not identified any instances of forced labour or child labour within its supply chains during the reporting period, no remediation measures have been required. The Salvation Army remains committed to maintaining vigilant oversight and will continue to engage with suppliers to promote ethical practices and ensure compliance with labour standards.

**(e) Measure To Remediate Loss of Income**

In the absence of identified cases of forced or child labour, no remediation has been necessary to address loss of income related to such practices. Nonetheless, The Salvation Army recognizes the importance of ongoing due diligence and remains dedicated to proactive monitoring and supplier engagement to mitigate any potential risks.

**(f) Employee Training**

As part of our ongoing commitment to the Modern Slavery Act, The Salvation Army continues to prioritize education and awareness raising among our employees, particularly those engaged in procurement, supply chain management, compliance and purchasing at the local ministry unit level. We recognize that equipping our staff with the knowledge to identify and respond to the risks of modern slavery, including forced labour and child labour is a critical component of our broader strategy to ensure ethical and transparent sourcing practices.

In last year's report, we outlined plans to develop a tailored training program focused on these issues. This year, we have moved from planning to implementation. The following section outlines the actions taken to roll out the training, the scope of staff engagement and the outcomes achieved as we continue to strengthen our organizational response to modern slavery.

The Salvation Army's legal and procurement teams collaborated to develop a comprehensive online training program, specifically designed to educate staff on modern slavery in supply chains. The training includes engaging multimedia content with video, audio narration and visual aids to enhance accessibility, engagement and retention across a wide range of roles and learning styles.

This training is mandatory for senior management team, department heads, divisional leaders, ministry unit leaders and all staff with purchasing authority, given their direct involvement in sourcing decisions and supplier interactions. The training is also strongly encouraged for all other staff as building a shared understanding across the organization is essential to our mission. Furthermore, The Salvation Army is planning to incorporate this training as a mandatory component of the onboarding process for all new employees, embedding awareness and responsibility from the outset of their roles.

The training module covers the following key areas:

1. Introduction—the importance of modern slavery awareness and The Salvation Army's commitment to ethical practice.
2. Overview of the Fighting Against Forced Labour and Child Labour in Supply Chains Act.
3. Understanding modern slavery under the Act.
4. The Salvation Army's entity classification and reporting obligations.
5. Modern slavery by the numbers—key global statistics from the International Labour Organization (ILO).
6. Modern slavery risks in The Salvation Army's supply chains.

7. Spotting warning signs—practical guidance for identifying risks of child labour and forced labour.
8. Case study—a real-world scenario to support learning and critical thinking.
9. Preventive measures—actions to prevent modern slavery in The Salvation Army’s operations and supply chains.
10. Reporting obligations and how to report concerns.
11. Penalties under the Act.
12. Conclusion and call to action—reaffirming each employee’s role in identifying and preventing modern slavery.
13. Modern slavery awareness quiz—a final quiz to reinforce understanding and key takeaways.

The training has been very well received across the organization. Senior management and ministry unit leaders have shown strong support, recognizing the training as a vital tool in building organizational awareness and accountability. As a result, participation has been very satisfactory, with widespread engagement from staff across various departments and ministry units.

This program not only fulfills our compliance obligations but also strengthens our commitment to ethical sourcing and human rights. By investing in knowledge and capability, we are empowering our people to take meaningful action in identifying risks, protecting vulnerable individuals and upholding the values at the heart of The Salvation Army’s mission.

The Salvation Army has continued to strengthen its commitment to addressing modern slavery and human trafficking through its dedicated team of staff and the ongoing implementation of the national Fight For Freedom Strategy. This comprehensive strategy remains focused on five key areas: education, awareness and training, prevention and outreach, survivor support and recovery services and collaboration and advocacy. Training remained a central pillar, with expanded efforts to equip staff and community partners with the knowledge and tools to identify and respond to exploitation. The following statistics highlight the tangible outcomes and progress made across these focus areas in 2024.

### **Education, Awareness and Training**

- Provided awareness training at **31 community events** to **930 people**.
- **302 people** enrolled in our online, self-paced Introduction to Modern Slavery and Human Trafficking Certificate with **270 completions** since launched in 2022.
- Provided training to **605 people** at **18 workshops and webinars** on specific modern slavery and human trafficking topics.
- Provided training on modern slavery and human trafficking to **218 employees and officers**.

## Prevention and Outreach

- Provided **4,821 instances of outreach support** through case management meetings, accompaniment to services, access to support networks and court proceedings.
- **421 individuals** with lived experience received essential services, reinforcing our commitment to empowering and protecting survivors.

## Survivor Services and Recovery

- **524 survivors** were supported and served through our four MSHTR focused ministry units.
- **315 survivors** were female. **163 survivors** were LGBTQ2S+. **46 survivors** were male.
- **73 survivors** were helped to exit their human trafficking situation.
- **343 survivors** were experiencing sex trafficking and sexual exploitation.
- **169 survivors** were experiencing labour trafficking and labour exploitation.
- **12 survivors** were experiencing a forced marriage.
- **604 safety plans** created with victims.
- **299 victims and survivors** received crisis support interventions.
- **329 emergency and hygiene kits** handed out to victims and survivors.
- **4,813 nights of housing** provided to survivors.
- **285 survivors** engaged in life skills training.
- **95 survivors** received legal support.
- **58 survivors** engaged in ongoing trauma counselling.
- **44 survivors** participated in employment training.

## Collaborations and Advocacy

- Engaged in **55 internal and external partnerships**, collaborating to support survivors through collective programming and projects, provide education and awareness via classes and webinars, advance prevention efforts and referrals, address demand reduction strategies and strengthen advocacy initiatives.
- Participated in **13 local and national modern slavery and human trafficking task forces and coalitions**, reinforcing our commitment to a coordinated, multi-sector response.
- Contributed to two groundbreaking research projects, combining technology and survivor- informed strategies to strengthen anti-trafficking efforts.

## (g) Assessment of Effectiveness

The Salvation Army remains committed to evaluating the effectiveness of its efforts to prevent forced labour and child labour within its business operations and supply chains. This ongoing assessment includes the following components:

1. **Assessment of Supply Chains:** The Salvation Army continued its supply chain risk assessments, with a focus on identifying potential exposure to forced labour and child labour, particularly in cases where goods were imported from outside of Canada. This year's analysis confirmed that most goods were sourced from developed countries or through Canadian-based suppliers engaging non-high-risk industries. Moving forward, the Army will expand these efforts to include deeper reviews of procurement processes and supplier relationships, including mapping supply chains where feasible and enhancing visibility into second-tier suppliers.
2. **Implementation of Reporting Mechanisms:** The Salvation Army took steps to strengthen internal reporting mechanisms related to forced labour and child labour. Staff are encouraged to report any suspected incidents of non-compliance through the Army's existing Whistleblower Policy, which includes clear instructions and procedures for submitting a concern. This policy provides a confidential and secure channel for raising issues, ensuring reports are handled with integrity and without retaliation. These mechanisms are essential to fostering a culture of accountability and transparency throughout the organization.
3. **Training and Awareness:** In 2024, training development progressed significantly. Educational materials were created to raise awareness of forced labour and child labour risks and to help staff at the ministry unit level, as well as those involved in procurement and compliance, understand their responsibilities under the Act. These materials cover key topics such as recognizing risk indicators, understanding reporting obligations and applying ethical procurement practices in day-to-day operations. Ongoing training sessions are planned to ensure consistent understanding across the organization.
4. **Engagement with Suppliers:** A major milestone in 2024 was the implementation of a Supplier Code of Conduct. All potential vendors are now required to sign this code before participating in any request for proposals (RFP) handled through the procurement team. The code clearly outlines expectations around forced labour, child labour, human trafficking, wages and working conditions, health and safety and other ethical standards. This initiative strengthens supplier engagement by setting clear expectations from the outset and aligning all new partnerships with the Army's values and obligations under the Act.
5. **Collaboration with Stakeholders:** The Salvation Army remains open to collaboration with government bodies, peer institutions and industry partners to strengthen collective efforts to eliminate forced labour and child labour. The Army supports sharing of best practices, contributing to policy discussions and exploring partnerships that enhance supply chain transparency and accountability.
6. **Continuous Improvement:** To ensure the effectiveness of its approach, The Salvation Army continues to monitor and evaluate its policies, procedures and practices. The procurement policy and training programs are subject to regular review, and the recent adoption of the

Supplier Code of Conduct marks a significant step forward in strengthening safeguards. Moving ahead, the Army will continue refining these measures, addressing any identified gaps, and ensuring its approach remains both compliant and mission aligned.

### **3. Conclusion**

The Salvation Army remains steadfast in its commitment to combating forced labour, child labour and all forms of exploitation within its operations and supply chains. The steps taken in past fiscal year, including the implementation of a Supplier Code of Conduct, continued supply chain assessments, expanded training and increased ethical sourcing reflect the Army's proactive and values-driven approach to responsible procurement. By embedding human rights principles into policy, practice and partnerships, the Army not only aligns with legislative obligations under the Act but also upholds its long-standing mission to protect human dignity and promote justice.

As global risks evolve, The Salvation Army will continue to strengthen its practices, engage its stakeholders and assess its impact to ensure that its efforts are both effective and enduring. Through continued vigilance, collaboration and leadership, the Army reaffirms its role in creating a supply chain that respects and protects the rights of all individuals.

## 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.

I have the authority to bind **The Governing Council of The Salvation Army in Canada** as a member of the Governing Council.

Full Name Colonel John Chamness

Title Chief Secretary

Signature 54A462E80E414BD...

Date 23 May 2025