

Date: April 15, 2026
To: NBS Board of Directors
From: NBS Finance & Audit Committee
Re: Board Approval - Compliance Requirements for Bill s-211

The Canadian Parliament passed Bill S-211 or the **Fighting Against Forced Labour and Child Labour in Supply Chains Act** on May 3, 2023, to protect vulnerable populations from human rights abuses and exploitation. The bill took effect on January 1, 2024.

This compliance report is due before May 31, 2026 and it will be based on information around goods imported by the School's retail store, The Shoe Room, a related and subordinate business, during the 2024/2025 fiscal year. The report centres around a lengthy questionnaire that NBS completes and which the Finance and Audit Committee has reviewed. Since the first reporting on May 31, 2024, NBS has taken immediate steps to initiate effective process, requiring all suppliers to submit an attestation, prior to fulfillment, that forced and/or child labour is not employed in the manufacture of their goods.

Board approval is required to submit the final report.

MOTION:

That, on the recommendation of the Finance & Audit Committee, the NBS Board approves submission of the annual report to the Minister of Public Safety and Emergency Preparedness in compliance with Bill S-211, or the **Fighting Against Forced Labour and Child Labour in Supply Chains Act**, to be submitted before May 31, 2026.

Upon a motion duly made by Fabio Mascarin and seconded by Karlee Vukets, and on the recommendation of the Finance & Audit Committee, it was resolved that the NBS Board approve the submission of the annual report to the Minister of Public Safety and Emergency Preparedness, in compliance with Bill S-211, the Fighting Against Forced Labour and Child Labour in Supply Chains Act, to be filed no later than May 31, 2026

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.



Name: Andrea Stars Krisnnappa
Board Position: Board Chair
Date:

**Annual Report to Public Safety Canada
May 2026**

Re: Bill S-211 - *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Part 1 - Submission information

1. This report is for: (Mandatory)

- An entity

2. State the legal name of the reporting entity or government institution (Mandatory)

Canada's National Ballet School/L'Ecole nationale de ballet du Canada

3. Reporting year (Mandatory)

May 31, 2026

4. Financial year covered by report (Mandatory)

September 1, 2024 – August 31, 2025

**5. Is this a revised version of a report that was already submitted this reporting year?
(Mandatory)**

- No

**6. For entities only: Business number(s) (if applicable, provide the business number of
the entity completing this questionnaire):**

Ontario Corporation # 128497

7. For entities only: Is this a joint report? (Mandatory)

- No

8. For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Mandatory)

- No

9. For entities only: Which of the following categories apply to the entity? Select all that apply. (Mandatory)

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

10. For entities only: In which of the following sectors or industries does the entity operate? Select all that apply. (Mandatory)

- Retail trade
 - Sporting goods, hobby, musical instrument, book, and other retailers
- Educational services
- Arts, entertainment and recreation
 - Performing arts, spectator sports and related industries
- Other, please specify:
 - Professional arts training (dance), NPO/Registered Charity

11. For entities only: In which country is the entity headquartered or principally located? (Mandatory)

Canada

11.1 If in Canada: In which province or territory is the entity headquartered or principally located? (Mandatory)

Ontario

Part 2 - Annual Report

Reporting for entities

1. Which of the following accurately describes the entity's structure? (Mandatory)

- Corporation

2. Which of the following accurately describes the entity's activities? Select all that apply. (Mandatory)

- Importing into Canada goods produced outside Canada

3. 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. (Mandatory)

- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Developing and implementing an action plan for addressing 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
- 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
- Monitoring suppliers
- Developing and implementing training and awareness materials on forced labour and/or child labour
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

4. Please describe the steps the entity has taken to prevent or reduce risks of forced labour or child labour in its supply chains (if applicable) (3,000 character limit).

Steps taken to prevent/reduce the risk that forced or child labour is used in our vendor's supply chains:

- Conducted research into vendor processes, production and business policies/procedures
- Developed process/procedures for identifying and mitigating risk with NBS The Shoe Room staff, NBS Senior Leadership and NBS Finance and Audit Committee (committee of the Board of Directors).
- Consulted with sector experts to validate process and procedures
- Conducted discussions and learning sessions with all staff working at NBS The Shoe Room on the issue and ways to identify/mitigate the risk

5. Does the entity currently have policies and/or due diligence processes in place related to forced labour and/or child labour? (Mandatory)

- Yes

5.1 If yes, which elements of the policies and/or due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Mandatory)

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing potential and actual adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating potential and actual adverse impacts
- Tracking implementation and results

6. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Mandatory)

- Yes, we have identified parts of our activities and/or supply chains that carry risks to the best of our knowledge and will continue to identify emerging risks.

6.1 If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Mandatory)

- Tier three suppliers

7. Has the entity 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. (Mandatory)

- Manufacturing
 - Apparel manufacturing
- Retail trade
 - Clothing, clothing accessories, shoes, jewelry, luggage and leather goods retailers
 - Sporting goods, hobby, musical instrument, book, and other retailers

8. Please provide details on the parts of the entity's activities and supply chains where the entity has identified a risk of forced labour or child labour and describe the actions taken to assess and manage those risks (if applicable) (3,000 character limit).

Canada's National Ballet School (NBS) is the largest arts training organization in Canada, and is a non-profit, charitable organization. NBS offers training/education through Professional Ballet Programs, Comprehensive Dance Programs and Community Dance Programs. NBS has identified potential risk through its retail business The Shoe Room (TSR) – a ballet boutique located in Toronto, ON. TSR operates with 10-12 dedicated staff annually, in a single, brick and mortar location (406 Jarvis Street, Toronto) with an online store. Products are purchased through a combination of suppliers and vendors within and outside of Canada, the majority being small business or medium-sized companies. There is potential risk that goods being imported include forced and/or child labour in their production; however, NBS has assessed the risk as minimal, given the size and nature of the companies, and based on research into the companies' processes and business operations.

TSR is regarded as a related business, linked to NBS' charitable purpose (re: Policy Statement CPS-019 on Government of Canada website). TSR is a necessary concomitant of NBS' charitable programs; focused on providing dancewear, shoes and equipment to NBS students and the general public as a source of revenue for NBS. TSR offers pointe shoe fitting services in person and virtually, to democratize access for dancers. All revenues are re-invested into the charitable organization and growing NBS' mission.

TSR's staff complement represents approximately 4% of the total NBS workforce; The Shoe Room facility represents 1.9% of the square-footage of the NBS campus; and revenue from The Shoe Room represents roughly 5% of NBS' annual revenues.

NBS' established processes/procedures/best practices to assess and manage risk:

- NBS commits to only conducting business with suppliers/vendors who attest to not having child/forced labour as part of their production chain
- As part of this attestation process, all existing vendors/suppliers are required to attest to this annually in writing and new vendors/suppliers are required to attest to this in writing before any business is conducted
- All vendors are held accountable to informing NBS should production processes change to include forced and/or child labour.
- If it is discovered that a vendor/supplier's production incorporates forced and/or child labour, NBS will cease all business and report the company
- All staff working at The Shoe Room engage in training/knowledge translation activities on the issue and are contributing to the process of risk mitigation and forced/child labour identification
- NBS' Senior Management and Board of Directors provide oversight and are engaged in this process

9. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Mandatory)

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

10. Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Mandatory)

- 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.

11. Does the entity currently provide training to employees on forced labour and/or child labour? (Mandatory)

- Yes

11.1 If yes, is the training mandatory? (Mandatory)

- Yes, the training is mandatory for some employees.

12. Does the entity 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? (Mandatory)

- Yes

12.1 If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Mandatory)

- Setting up a regular review or audit of the entity's policies and procedures related to forced labour and child labour
- 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