
2024 Modern Slavery Act Report

Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023

Identifying information

This report is submitted by Saskatchewan Abilities Council Inc. (operating as SaskAbilities), a single entity, as required in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, also known as the Modern Slavery Act (the “Act”). The period to which this report relates commenced on January 1, 2024 and ended on December 31, 2024. This is not a revised version of a previously-submitted report.

SaskAbilities’ vision is to work together to build inclusive communities for people of all abilities. Our mission is to support people experiencing disability with programs and services to enhance their lives. Our values are: (1) We treat people with respect, honesty and compassion; (2) Our programs and services are client-centred, goal-oriented and accountable; and (3) We value teamwork, excellence and innovation.

Policy Statement with respect to human rights

SaskAbilities fully supports the objectives of the Act and opposes the use of all forms of forced/child labour, including in our operations and our supply chains. Respect for human rights is fundamental to our values and to the well-being of the communities in which we operate.

As set out in the United Nations Guiding Principles on Business and Human Rights (“**UNGPs**”), business enterprises have a responsibility to respect internationally recognized human rights. The responsibility to respect human rights requires that business enterprises: (a) Avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur; and (b) Seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products, or services by their business relationships, even if they have not contributed to those impacts.

In 2024, SaskAbilities continued to assess the potential for our operations to cause, contribute to, or be directly linked to adverse human rights impacts, including forced/child labour. Currently, we are of the view that there is low risk that our operations have caused or contributed to adverse human rights impacts.

SaskAbilities is headquartered in Saskatoon, Saskatchewan. We acknowledge that we are on Treaty 6 Territory and the Homeland of the Métis people.

Steps taken to prevent and reduce risk of forced and child labour

What steps have been taken to prevent and reduce the risk that forced labour and/or child labour is used at any step in the production of goods? – Section 11(1)

Respect for human rights is fundamental to our values and to the well-being of the communities in which we operate. In fully supporting the objectives of the Act and opposing the use of all forms of forced/child labour, including in our operations and our supply chains, in 2024 SaskAbilities undertook a number of actions to prevent and reduce the risk of forced/child labour being used in operations or in the production of goods.

In 2024, SaskAbilities took the following steps to promote the objectives of the Modern Slavery Act:

- Formed a committee comprised of employees to assist with action items and preparation of the annual Modern Slavery Act report for the Government of Canada
- Gathered information on SaskAbilities' suppliers by:
 - Determining the type of supply provided
 - Determining primary country of origin
 - Identifying the top six suppliers to confirm a supplier code of conduct is in place
- Developed a written supplier code of conduct and affirmation that was:
 - Mass emailed to SaskAbilities' suppliers
 - Included in Canada Post mail to suppliers
 - Shared with new suppliers that came on board after the mass email was sent
- Educated employees about the Act:
 - During regular team meetings
 - During annual staff consultation sessions held with employees across the province, including question and answer opportunities
 - By mass email informing employees of SaskAbilities' supplier code of conduct and reminding them of the important role of all employees in preventing and reducing the risk of forced/child labour in operations and supply chains
- Monitored employee recruitment:
 - For evidence of forced/child labour
 - By adding a question to the interview process that directly asks candidates if they are seeking employment by their own choice as well as being free to make their own decisions
 - By providing guidance to employees conducting interviews on how to respond and actions to take if a candidate indicates they may be a victim of forced/child labour.

Structure, activities, supply chains

Structure of SaskAbilities – Section 11 (3)(a)

SaskAbilities is a registered charity that operates under the authority of *The Non-profit Corporations Act, 2022*, of Saskatchewan. It is dedicated to providing programs and services to individuals experiencing disability in Saskatchewan and serves people of all ages and abilities. Operating as a single entity, SaskAbilities has assets over \$20 million and employs about 450 individuals across Saskatchewan.

Activities involving supply chains – Section 11 (3)(a)

In delivering its mission and realizing its vision, SaskAbilities operates business centres that provide manufacturing in sewing, wood products, metalwork, and commercial/industrial assembly fields. A range of products provide work experience and training for individuals in real-work settings and provide revenue to assist with program and service delivery. Products include custom crating, stakes, lath, manufacturing of coveralls, veterinary linens, ringette equipment and clothing, real estate signs, bulk mail services, packaging and sorting of high-volume materials. Products are mostly sold within the province of Saskatchewan and within Canada; however, some wood materials are shipped to the United States and Europe.

In addition to business centres, SaskAbilities manufactures and customizes Orthopaedic products and also distributes a variety of assistive devices and equipment to individuals throughout the province of Saskatchewan. Products and equipment include prosthetic devices, braces, splints, customized foot products, specialized

wheelchair seating, wheelchairs, walkers, tub transfer devices, commodes, safety poles, and customized pediatric wooden equipment. Orthopaedic products and assistive devices and equipment are sold and/or distributed in Saskatchewan only.

Approximate sales and distribution volume is \$12 million.

Supply chains – Section 11 (3)(a)

SaskAbilities uses supply chains to:

- Provide raw materials for products and materials that are manufactured, sold, and/or distributed by SaskAbilities
- Provide finished goods or nearly-finished goods for customization, sale and/or distribution
- Provide finished goods for re-sale and/or distribution.

Most supply chains are located within Canada; however, some raw materials, finished, or nearly-finished goods are sourced from the United States, China, Taiwan, Mexico, and Europe.

Approximate supply chain volume is \$10 million.

Policies and due diligence processes

What policies and due diligence processes are in place related to forced and/or child labour? – Section 11(3)(b)

SaskAbilities does not currently have policies or procedures in place specifically related to forced/child labour; however, in 2025, SaskAbilities intends to consider updating and/or developing new policies and procedures, including due diligence policy.

In 2024, SaskAbilities introduced a supplier code of conduct, began educating employees about the Modern Slavery Act, and monitored human resource activities for evidence of forced/child labour in its operations and supply chains.

Activities and supply chains that carry risk of forced and child labour

Has the organization identified activities and supply chains that carry a risk of forced and/or child labour being used? – Section 11 (3)(c)

SaskAbilities has long-standing relationships with many of its suppliers, the majority of which are located in Canada and the United States. SaskAbilities purchases one particular type of supply directly from a supplier in Taiwan and has done so by wire transfer for many years. This supplier has their own supplier code of conduct and also has received SaskAbilities' supplier code of conduct.

SaskAbilities purchases medical and accessibility-related equipment from larger suppliers in the United States. Some of this equipment is manufactured and/or assembled in Mexico. These larger United States suppliers that SaskAbilities purchases directly from have supplier codes of conduct in place.

Measures to remediate forced or child labour

Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains? – Section 11(3)(d)

SaskAbilities has not taken measures to remediate forced/child labour as no forced/child labour has been identified in activities or supply chains.

Measures to remediate loss of income to vulnerable families

Has the organization taken any measures to remediate the loss of income to the most vulnerable families that results from any measures taken to eliminate the use of forced labour or child labour in its activities and supply chains? – Section 11(3)(e)

Having not identified any forced/child labour in its activities and supply chains, SaskAbilities has also not identified any loss of income to vulnerable families resulting from measures taken, as no measures were taken.

Training for employees on forced and/child labour

Does the organization currently provide training to employees on forced labour and/or child labour? – Section 11(3)(f)

In 2024, SaskAbilities educated employees about the Modern Slavery Act in a variety of ways. Requirements of the Modern Slavery Act were discussed during regular team meetings, information was shared at annual staff consultation sessions held with employees across the province, and also employees were provided with a copy of SaskAbilities' supplier code of conduct and reminded of their important role in preventing and reducing the risk of forced/child labour in operations and supply chains. SaskAbilities will continue to educate employees about the Act, ways of identifying instances of forced/child labour in operations and supply chains, and how they can help mitigate the use of forced/child labour.

Assessing effectiveness

Does the organization currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and/or child labour are not being used in its activities and supply chains? – Section 11(3)(g)

SaskAbilities does not currently have policies and procedures in place to assess its effectiveness in ensuring that forced/child labour is not being used in activities and supply chains. Policies and procedures in relation to the Modern Slavery Act are being considered in 2025.

Approval and attestation

Approval of the annual Modern Slavery Act report by the governing body of SaskAbilities' – Section 11(4)(a).

At the March 5, 2025 meeting of the Board of Directors of SaskAbilities, the following motion was unanimously passed:

That, in accordance with Section 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, the Board of Directors reviewed and approved SaskAbilities' Modern Slavery Act report prepared for the period January 1, 2024 to December 31, 2024.

An attestation shall be signed by a member of the governing body of SaskAbilities – Section 11(5)(a)(b).

At the March 5, 2025 meeting of the Board of Directors of SaskAbilities, the following motion was unanimously passed:

That, in accordance with Section 11(5)(a)(b) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, the Board of Directors authorizes the President of the Board to execute and deliver the attestation regarding SaskAbilities' Modern Slavery Act report prepared for the period January 1, 2024 to December 31, 2024.

Attestation

I attest, on behalf of the Board of Directors of Saskatchewan Abilities Council Inc., that the Board of Directors reviewed the information contained in its Modern Slavery Act report prepared for the period January 1, 2024 to December 31, 2024; that the Board of Directors exercised reasonable diligence in reviewing the report; and that the information contained in the report is true, accurate, and complete.

This report is prepared pursuant to the criteria for a single entity and is approved by:



Andy Livingston
President of the Board of Directors
Saskatchewan Abilities Council Inc.
March 5, 2025