Government of Canada | Gouvernement du Canada

Thank you for submitting your annual report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Complete the questionnaire and submit your report

The next reporting deadline for the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act) is May 31, 2025. Reports are submitted to Public Safety Canada through the online questionnaire. Questionnaire responses and annual reports must reference the activities undertaken during the entity's or government institution's previous financial year.

If an entity or government institution is unsure whether they are required to report, refer to guidance on the application of the Act for entities or government institutions.

Purpose of the questionnaire

To submit their annual report, entities and government institutions must complete this questionnaire. The questionnaire collects information that responds to the Act's reporting requirements and is the mechanism for submitting an annual report to Public Safety Canada.

Questionnaire responses are used internally by Public Safety Canada to track submissions and catalogue reports. Submission information collected through the questionnaire supports the search function in the online repository of annual reports. Public Safety Canada may also use questionnaire responses for analytical purposes.

Entities and government institutions subject to the Act may refer to the list of questions and examples within the questionnaire when developing their annual reports. The reporting exercise, over time, is expected to improve entities' and government institutions' capacity to identify, prevent, reduce and address forced labour and child labour risks.

Completing the online questionnaire

The questionnaire is completed using information from activities undertaken during the entity's or government institution's previous financial year before the May 31 reporting deadline. There is no prescribed level of detail required for the responses. However, entities and government institutions must ensure that their responses to the questionnaire are accurate and that the information is consistent with their annual report.

In the case of a joint report, only the entity submitting the report should complete the questionnaire on behalf of all entities covered by the report. A joint report should only be submitted if the information provided generally applies to all entities covered by the report.

The questionnaire is considered complete if all of the mandatory fields have been filled out and a report has been uploaded at the end of the questionnaire that meets the following requirements of the Act:

- Contains information addressing each of the requirements in subsections 6(1) and 6(2), for government institutions, or in subsections 11(1) and 11(3), for entities;
- For entities, has received the necessary approvals and includes the signed attestation;
- For government institutions, is submitted in both official languages;
- Is a PDF file that does not exceed 100MB in size.

Public Safety Canada recognizes that the online questionnaire does not allow entities and government institutions to elaborate on all answers within the questionnaire. Entities and government institutions are encouraged to respond to the best of their ability and provide further clarification and detail within the annual report, as necessary.

At the end of the questionnaire, entities and government institutions must upload their annual report in PDF format, and select “submit”. Entities and government institutions will receive a confirmation email following submission, and will have the option to download a copy of their responses to the questionnaire.

Language requirements

Entities must complete the questionnaire and submit the PDF report at the end of the questionnaire in one of the two Canadian official languages. It is recommended, however, that reports be submitted in both English and French, in order to make reports accessible to the broader Canadian public. Entities that opt to submit their report in both Canadian official languages can upload two separate PDF files at the end of the questionnaire. Requests for translated copies of reports may be directed to the responsible entity.

Government institutions may complete the questionnaire in either Canadian official language, but are required to submit the PDF version of their report in both English and French, as per the *Official Languages Act*. At the end of the questionnaire, government institutions must upload their reports in both English and French as separate PDF files before they select “submit.”

Publication requirements

On providing a report to Public Safety Canada, entities must publish their report in a prominent place on their website.

Reports submitted to Public Safety Canada will also be made publicly available in a searchable online catalogue which is updated on an ongoing basis.

Only the PDF reports and select information submitted through the online questionnaire will be published on the Public Safety Canada website.

Public Safety Canada is not responsible for reports submitted by entities, which may or may not meet federal standards related to accessibility and official languages.

Failure to report

Failure to submit an annual report in accordance with the Act is considered an offence under subsection 19(1).

Knowingly making a false or misleading statement or providing false or misleading information is considered an offence under subsection 19(2).

All offences under subsections 19(1) and 19(2) are punishable on summary conviction and a fine of not more than $250,000.

Data Management Disclaimer

Questionnaire responses will be stored by Public Safety Canada and will be disposed of in accordance with the Policy on Service and Digital, the *Access to Information Act*, the *Privacy Act* and the *Library and Archives Act*. The report itself will be added to the Public Safety Library's collection and will be subject to the Public Safety Canada Library Collection Development Policy.

Public Safety Canada may proceed with the manipulation or translation of answers to align the bibliographical data of the report to Treasury Board Secretariat (TBS) Standard for Managing Metadata and Public Safety Canada Library cataloguing and description procedures.

In addition to the TBS standards for managing metadata, the library maintains a bilingual cataloguing style that reflects Library and Archives Canada's own policy on the Directive on the Official Language of Description (canada.ca). Specifically, metadata is entered in the language of submission, in order to present a "true and accurate representation of that publication".

In instances where an entity submits two reports: one in French, and one in English, these resources are divided and catalogued separately, with metadata being entered once in French, and once in English, to accurately reflect the contents of each.

If a singular bilingual publication is submitted, then we will enter all metadata twice in the same record, once in French, and once in English. In all scenarios, the goal is to accurately reflect the language contents of the published work within the metadata itself.

Privacy Notice Statement

Personal information is collected by Qualtrics on behalf of Public Safety Canada for the purpose of verifying information contained in reports submitted under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act).

Public Safety Canada requires entities and government institutions required to report under the Act to complete the questionnaire. Please note that information entered in any open text box field could be identifiable depending on the information provided. In order to protect privacy, entities and government institutions must not add personal information of any kind in these open text areas.

Personal information will be managed and administered in accordance with the *Access to Information Act,* the *Privacy Act* and any other applicable laws. Public Safety Canada may use the personal information provided in the questionnaire responses for policy development purposes, but the information may also be used for investigative purposes.

For more information on Public Safety Canada's privacy practices related to online activities, please refer to Public Safety Canada's Terms and conditions.

You have the right to the protection of, access to and correction of your personal information. Find instructions for obtaining information through Public Safety Canada's Access to Information and Privacy (ATIP).

Any questions, comments, concerns or complaints you may have regarding Public Safety Canada's handling of your personal information may be directed to our Access to Information and Privacy Coordinator by emailing atip-aiprp@ps-sp.gc.ca. If you are not satisfied with Public Safety Canada's response to your privacy concern, you have the right to file a complaint with the Privacy Commissioner of Canada regarding the institution's handling of your personal information.

*I have read and understand the information above.

PART 1

Submission Information

In order to protect privacy, entities and government institutions must not provide personal information of any kind in the open text box fields of this questionnaire.

Public Safety Canada recognizes that some aspects of the online questionnaire may limit an entity or government institution's ability to elaborate on complex information or provide detailed responses. Entities and government institutions are encouraged to respond to the best of their ability and provide further clarification and detail in the annual report, as necessary.

An entity submitting a joint report on behalf of multiple entities (e.g., its subsidiaries) may complete **Part 1: Submission Information** using information that reflects its own circumstances and operations. However, any information provided in **Part 2: Annual Report** should reflect the activities of all entities covered by the joint report. In cases where the information applicable to each entity differs significantly, each entity should submit its own report and complete the online questionnaire separately.

*This report is for :

Note: Government institution has the same meaning as in section 3 of the *Access to Information Act*.

- [x] An entity
- [ ] A government institution

*State the legal name of the reporting entity or government institution:

Note for entities: You must use an alphanumeric naming convention. Do not include acronyms. If you are an entity submitting a joint report, only the legal name of the entity submitting the report should be included in this field. Do not list all entities covered by the report, you will be asked to identify the names of the entities covered in the report later in the questionnaire.

Birla Carbon Canada Ltd.

Characters remaining: 976

*Reporting year:

Select from the drop down menu the applicable **reporting deadline** for which you are submitting a report):
Note: this may not reflect the financial reporting year.

May 31, 2025, deadline

*Financial year covered by report (Start Date):

Note: All reports must reference the activities undertaken during the entity or government institution's previous financial year. Reports may be submitted on or before May 31. As such, the submission date of the report will determine which financial year you are reporting on.

Month: April

Day: 1

Year: 2024

*Financial year covered by report (End Date):

Note: All reports must reference the activities undertaken during the entity or government institution's previous financial year. Reports may be submitted on or before May 31. As such, the submission date of the report will determine which financial year you are reporting on.

Month: March

Day: 31

Year: 2025

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

Note: The previous version will be deleted and users will be unable to recover the previously submitted version.

- [ ] Yes
- [x] No

Business number(s) (if applicable, provide the business number of the entity completing this questionnaire):

Corporate file number: 2016210276 Federal Business No. 101058428 RC 0002

Characters remaining: 928

*Is this a joint report?

- [ ] Yes
- [x] No

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

- [ ] Yes
- [x] No

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

Note: If none of these categories apply to your organization, you may not be required to report. Please visit Public Safety Canada's guidance for entities to confirm your obligations under the Act before proceeding with your submission.

- [ ] Listed on a stock exchange in Canada

Canadian business presence (select all that apply):

- [x] Has a place of business in Canada
- [x] Does business in Canada
- [x] Has assets in Canada

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

- [x] Has at least $20 million in assets for at least one of its two most recent financial years
- [x] 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

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

- [ ] Agriculture, forestry, fishing and hunting
- [ ] Mining, quarrying, and oil and gas extraction
- [ ] Utilities
- [ ] Construction
- [x] 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:

*Manufacturing

- [ ] Food manufacturing
- [ ] Beverage and tobacco product manufacturing
- [ ] Textile mills
- [ ] Textile product mills
- [ ] Apparel manufacturing
- [ ] Leather and allied product manufacturing
- [ ] Wood product manufacturing
- [ ] Paper manufacturing
- [ ] Printing and related support activities
- [ ] Petroleum and coal product manufacturing
- [x] Chemical manufacturing
- [ ] Plastics and rubber products manufacturing

- [ ] Non-metallic mineral product manufacturing
- [ ] Primary metal manufacturing
- [ ] Fabricated metal product manufacturing
- [ ] Machinery manufacturing
- [ ] Computer and electronic product manufacturing
- [ ] Electrical equipment, appliance and component manufacturing
- [ ] Transportation equipment manufacturing
- [ ] Furniture and related product manufacturing
- [ ] Other manufacturing

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

Canada

***In which province or territory is the entity is headquartered or principally located?**

Ontario

Part 2

Annual Report

In order to protect privacy, entities must not provide personal information of any kind in the open text box fields of this questionnaire.

Public Safety Canada recognizes that some aspects of the online questionnaire may limit an entity's ability to elaborate on complex information or provide detailed responses. Entities are encouraged to respond to the best of their ability and provide further clarification and detail in the annual report, as necessary.

Information provided in response to **Part 2: Annual Report** should reflect the activities of all entities covered by the report submitted at the end of the questionnaire.

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

- [x] Corporation
- [ ] Trust
- [ ] Partnership
- [ ] Other unincorporated organization

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

Note: If an organization is not involved in any of the following activities, then it may not be required to report under the Supply Chains Act, even if it meets the definition of **entity**. Entities that do not engage in these activities but wish to submit a report in the interest of transparency may do so by selecting 'Other' below and further describing their activities in the PDF report.

- [x] Producing goods (includes manufacturing, extracting, growing and processing) in Canada
- [ ] Producing goods (includes manufacturing, extracting, growing and processing) outside Canada
- [ ] Importing into Canada goods produced outside Canada
- [ ] Controlling an entity engaged in producing goods in Canada
- [ ] Controlling an entity engaged in producing goods outside Canada
- [ ] Controlling an entity engaged in importing into Canada goods produced outside Canada
- [ ] Other

***What steps has the entity taken in its 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
- [ ] Mapping supply chains
- [ ] Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- [ ] Contracting an external 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
- [ ] Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- [x] Addressing practices in the organization's activities and supply chains that may cause or contribute to the risk of forced labour and/or child labour
- [x] 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
- [x] Requiring suppliers to have policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains

- [x] Developing and implementing child protection policies and processes
- [x] 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
- [x] Monitoring suppliers
- [ ] Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
- [x] Developing and implementing grievance mechanisms to address complaints in the workplace
- [x] Developing and implementing training and awareness materials on forced labour and/or child labour
- [ ] Developing and implementing procedures to track effectiveness 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

Please provide additional information describing the steps taken (if applicable) (3,000 character limit).

Please note that information entered could be identifying information. In order to protect privacy, entities must not provide personal information of any kind in the open text box fields of this questionnaire.

In this regard, Birla Carbon adopted and published its consolidated Code of Global Business Ethics and Compliance Standards (the “Code of Conduct” or “Code”) in 2014, which codifies our commitment to (i) conducting our business ethically and in accordance with all applicable laws; (ii) adhering to standards of safety and care for the protection of our Employees, the public, and the environment; and (iii) promoting these policies through education, supervision, and regular reviews. We require all our employees to complete annual training on the Code and certify that each employee, has received, reviewed, and understands the Code and his or her obligation to report any violations thereof. In FY 2025, we added In FY 2025, we added a discreet module to our online Code of Ethics training program specifically aimed at equipping our employees and contractors to recognizing, report, and prevent force labour, child labour, and human trafficking. Further, Birla Carbon maintains a robust Hotline program for reporting suspected violations of the Code or applicable laws. Moreover, we have implemented a robust enterprise due diligence program whereby we screen all our suppliers, contractors, consultants, and vendors for legal and ethical violations, and we have incorporated a provision into our standard Terms and Conditions of Purchase similarly requiring our approved suppliers to comply with such laws as well as to Birla Carbon’s policies, including those regarding safety, security, and ethical business practices.

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

- [x] Yes
- [ ] No

***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.**

- [x] Embedding responsible business conduct into policies and management systems
- [x] Identifying and assessing potential and actual adverse impacts in operations, supply chains and business relationships
- [x] Ceasing, preventing or mitigating potential and actual adverse impacts
- [ ] Tracking implementation and results
- [ ] Communicating how impacts are addressed
- [ ] Providing for or cooperating in remediation when appropriate

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

Note : Entities are being asked to **indicate if they have considered the ways in which their activities and supply chains could potentially cause, contribute to, or be linked (directly or indirectly) to actual or potential forced labour or child labour**. Identifying parts of an entity's activities and supply chains that carry a risk does not indicate that forced labour or child labour was or is actually being used.

- [ ] Yes, we have identified parts of our activities and/or supply chains that carry a risk to the best of our knowledge and will continue to identify emerging risks.
- [x] Yes, we have started the process of identifying parts of our activities and / or supply chains that carry risks, but there are still gaps in our assessments.
- [ ] No, we have not started the process of identifying parts of our activities and / or supply chains that carry risks of forced labour or child labour being used.

***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.**

- [ ] The sector or industry it operates in
- [ ] The types of products it produces 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
- [x] 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

***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.**

- [ ] 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
- [x] None of the above
- [ ] Other, please specify:

Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the organization has taken to assess and manage that risk (if applicable) (3,000 character limit)

Please note that information entered could be identifying information. In order to protect privacy, entities must not provide personal information of any kind in the open text box fields of this questionnaire.

Birla Carbon Canada utilities contractors in certain circumstances, and these may be vulnerable to the use of forced labour.

Characters remaining: 2875

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

- [ ] Yes
- [ ] No
- [x] Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

***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?**

- [ ] Yes
- [ ] No
- [x] 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 entity currently provide training to employees on forced labour and/or child labour?**

- [x] Yes
- [ ] No

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

- [x] Yes, the training is mandatory for all employees.
- [ ] Yes, the training is mandatory for employees making contracting or purchasing decisions.
- [ ] Yes, the training is mandatory for some employees.
- [ ] No, the training is voluntary.

***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?**

- [ ] Yes
- [x] No

***Upload report (Required) (100MB limit):**

Upload your report, including the signed attestation, in PDF format

Canada Forced and Child Labour in Supply Chains Act Report (BC CAN 5-29-2025) SIGNED.pdf

0.9 MB

application/pdf

Upload report in second Canadian official language (Optional) (100MB limit):

Upload your report, including the signed attestation, in PDF format

Drop files or click here to upload

* I confirm that the attached report is approved and attested, as required under subsection 11(4) and subsection 11(5) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

*Please identify the name, title and email address of the person authorized to fill out this questionnaire.

(Note: Public Safety Canada may use the contact information provided should it require additional details regarding the submission. Info will be used as per the privacy note statement.)

Name:

Richard J. Paris, Jr.

Title:

Deputy General Counsel, Assistant Secretary

Email address:

richard.paris@adityabirla.com

*Do you wish to submit your responses to this questionnaire? (If you wish to amend your answers, please click the "Previous" button.)

Yes

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