



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

MSH International (Canada) LTD. (“MSH Americas”)

**The Compliance Officer**

[complianceofficer@americas.msh-intl.com](mailto:complianceofficer@americas.msh-intl.com)



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## Introduction

The [Fighting Against Forced Labour and Child Labour in Supply Chains Act](#) is a Canadian law that aims to increase transparency and accountability in supply chains to combat forced labour and child labour. It requires large entities operating in Canada to report annually on their efforts to prevent and mitigate these exploitative practices.

## Our structure, operations, and supply chain

At MSH International (Canada) Ltd. (herein known as "MSH Americas"), we have a diverse supply chain encompassing various goods and services. We use third-party vendors to order our office supplies and IT equipment. We use third party vendors to order marketing material and we share that marketing material inside and outside of Canada with potential clients.

- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains: We annually review our vendors from a risk-based approach
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily: This is handled through the HR recruitment process and we do not employ anyone under 18 years old
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour: we have emailed vendors requesting what they do for prevention of forced labour/child labour

## Human rights statement

MSH International (Canada) Ltd. is committed to upholding human rights and ensuring our operations and supply chains are free from forced labour, child labour, and other exploitative practices. We condemn all forms of modern slavery and strive to promote ethical and responsible business conduct.

## Anti-money laundering (AML) statement

MSH Americas has robust anti-money laundering policies and procedures in place to prevent our operations from being used for money laundering or terrorist financing activities. We conduct due diligence on our business partners and transactions to mitigate these risks.

## Third-party suppliers' statement

All vendors, contractors and partners working with MSH International must adhere to the following assessment criteria:

- Vendors granted access to company information resources must read and sign MSH International vendor agreement/non-disclosure agreement/contractor agreement
- Vendors must be evaluated prior to the start of service and thereafter on an annual basis by MSH International associated relationship [manager/owner]
- High risk findings must be reviewed by someone with knowledge about the vendor/partner relationship and remediated immediately by a qualified individual
- A vendor risk assessment must be performed on all requested cloud providers before approval
- A vendor risk assessment must be reviewed and authorized prior to moving any data to a cloud provider. The scope of "cloud providers" include all SaaS, PaaS and IaaS product offerings
- Vendors with PCI-DSS compliance requirements must have their status reviewed on an annual basis
- Vendors with SOC2 compliance requirements must have their status requirements reviewed annually
- Vendors with ISO 27001 compliance requirements must have their status requirements reviewed quarterly

We recognize the importance of responsible supply chain management and expect our third-party suppliers to adhere to the highest ethical standards. We conduct annual assessments of our suppliers on an annual basis to ensure compliance with our policies and applicable laws.

## Identifying risks and mitigation

Like other financial institutions, MSH International (Canada) Ltd. faces potential risks related to forced labour and child labour in our supply chains. We have implemented measures to identify and mitigate these risks, including:

- Conducting risk assessments of our operations and supply chains
- Implementing due diligence processes for suppliers and business partners
- Providing training and awareness programs for employees
- Establishing grievance mechanisms for reporting concerns

## Remediation

MSH International (Canada) Ltd. encourages the reporting of any suspected violations of our policies or applicable laws. We have established a whistleblower hotline and a designated Compliance Officer to receive and investigate such reports. The Compliance Officer may be contacted at:

[complianceofficer@americas.msh-intl.com](mailto:complianceofficer@americas.msh-intl.com).

Appropriate remedial actions will be taken in response to confirmed violations.