



CBC/Radio-Canada Fighting Against Forced Labour and Child Labour In Supply Chains 2024 Report





This report is made pursuant to the reporting obligations laid out in *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the *Act*), which came into effect on January 1, 2024. CBC/Radio-Canada is committed to identifying, addressing and preventing forced labour and child labour in our supply chains and activities. This is the first report in which we set out the work undertaken during the financial year ended March 31, 2024, to address forced labour and child labour in our supply chains and activities.

About Us

Who We Are

We are Canada's national public broadcaster and we are guided by the *Broadcasting Act*.

Our Vision

Your Stories, Taken to Heart

Our Mission

CBC/Radio-Canada celebrates Canadian culture and supports democratic life through a wide range of content that informs, enlightens and entertains.

Our Values

- Integrity
- Creativity
- Relevance
- Inclusiveness

Our legislated mandate is to inform, enlighten and entertain all Canadians. *The Broadcasting Act* further states that our programming should:

- Be predominantly and distinctly Canadian;
- Reflect Canada and its regions to national and regional audiences, while serving the special needs of those regions;
- Actively contribute to the flow and exchange of cultural expression;
- Be in English and in French, reflecting the different needs and circumstances of each official language community, including the particular needs and circumstances of English and French linguistic minorities;
- Strive to be of equivalent quality in English and in French;
- Contribute to a shared national consciousness and identity;
- Be made available throughout Canada by the most appropriate and efficient means and as resources become available for the purpose; and
- Reflect the multicultural and multiracial nature of Canada.



As Canada's national public broadcaster, we are inspired daily by our mission, vision and values to connect all Canadians and to showcase our stories, culture and news to Canada and the world. Our head office is in Ottawa. Our two main networks are based in Toronto (English) and Montreal (French), with community-based locations across the country, including 27 television stations, 88 radio stations and one digital-only station. We have five discretionary television channels and four Canada-wide radio networks, two in each official language. Internationally, we have five permanent foreign bureaus, and we have the capacity to set up pocket bureaus in other locations as needed.

Our people

We employ over 7,000 employees¹ from a multitude of backgrounds and cultures. Our people are an integral part of our success in reflecting contemporary Canada.

Our supply chain and activities

We broadcast news and entertainment across Canada and globally, on television, on radio and on our digital platforms.

Our programs are produced by us and by the Canadian independent production companies we commission. Our supply chain for producing content includes suppliers of equipment, props, set construction materials, vehicles and support services.

We also acquire program licences from third parties for movies, series, documentaries and comedies, where our suppliers are Canadian, American and international studios and other distributors of finished content. We also acquire sports rights and we broadcast sports, including the Olympic Games, from the countries where the games are played.

Considering our activities, our supply chain includes suppliers of facilities, information technology, media technology, professional services, and other goods and services.

¹ *Permanent, temporary and contract employees*



Our Approach to Tackling Forced Labour and Child Labour

Governance

We are committed to tackling the risks of forced labour and child labour in our supply chains and activities. We have established a Steering Committee composed of representatives from our legal, procurement and finance departments. The Steering Committee will ensure a rigorous governance framework is in place to govern all analysis and decisions concerning the risk of forced labour and child labour.

Our approach is evolving as we gradually increase our understanding of where our risks lie.

Our policies

We promote policies that highlight our ethical commitment with our people and vendors.

Procurement

All procurement activities align with the following principles:

- They are transparent, fair, unbiased and non-discriminatory.
- They are competitive and optimize market potential to achieve the best value.
- They align with the Corporation's sustainability and equity, diversity and inclusion objectives.
- They are consistent, cost-effective and efficient.
- They minimize risk by having defined rules, operational requirements and internal controls.
- They are recorded and documented.

The Supply Chain Management (SCM) department has authority and accountability over all procurement activities and shares responsibility with business units to perform and execute the full array of procurement activities in line with our policies and these principles.

Sourcing methods are determined based on balancing both business efficiency and risk mitigation. Key factors in the evaluation of the risks associated with a procurement activity include the total financial value of a contract and qualitative factors such as the impact on the Corporation's core operations, business continuity, security and safety, reputation and brand, and confidential, personal and strategic information.



Our terms and conditions with suppliers require them to:

- Comply with all applicable laws and industry standards and practices.
- Not assign or otherwise transfer any of their contractual rights or obligations without our prior written consent.

In 2023, we launched our Directive on Sustainable Procurement that requires the Corporation to take into account social and environmental considerations in our procurement processes, such as ecolabels or ethical certifications. The Directive builds on our [Procurement Policy](#), which aims to align with our sustainability and equity, diversity and inclusion objectives. We updated the [website for suppliers](#) that hosts all of our policies and relevant resources in a single place to include a section on Sustainable Procurement and a direct link to our [Vendor Code of Conduct](#).

We have also launched a toolkit on our procurement intranet to ease access to information, training resources and change management tools.

Vendors

In 2023, we launched our [Vendor Code of Conduct](#) in order to set out the expectations CBC/Radio-Canada has (including in relation to labour and human rights) of our vendors, suppliers, service providers and consultants, as well as their employees and representatives (each, a “Vendor”). We want to make sure our suppliers uphold the [International Labour Organization \(ILO\)](#) conventions, the [UN Guiding Principles](#) on Business and Human Rights, and regional or national legislation governing working conditions.

More specifically, the following pillars are expected to be upheld by our vendors:

- Freely chosen employment - Vendors shall not use any form of forced or involuntary labour, slavery or human trafficking. All work must be voluntary, and their employees shall be free to leave or terminate their employment at any time.
- Child labour - Vendors shall not permit labour or hire of employees under the legal age of employment.
- Wages, benefits and working hours - Vendors shall pay their employees according to applicable wage laws, including minimum wage, pay equity, overtime hours and mandated benefits. Working hours shall not exceed the maximum set by local law.
- Discrimination and harassment - Vendors shall prohibit discrimination based on grounds set out in the *Canadian Human Rights Act*.
- Freedom of association - Vendors shall respect the right of employees, as set forth in local laws, to associate freely and to bargain collectively.



When the Vendor Code of Conduct came into effect in August 2023, an email to current CBC/Radio-Canada vendors was sent to inform them of this change and to encourage them to adhere to the principles. The Vendor Code of Conduct is included as an obligation in the Standard Terms and Conditions in our contracts and purchase orders.

Our procurement team can be contacted at Codeofconduct@cbc.ca to answer any questions pertaining to the interpretation or application of the Code. This email can also be used to report any suspected violations of the Code. No such reports were made in 2023-2024. No communication or report has been issued which allows us to note that our stakeholders have not reported any concerns in our supply chains.

Activities

Our policies and Vendor Code of Conduct flow from the Corporation's [Code of Conduct](#). The Code outlines the values, ethical principles and expected behaviours applicable not only to all CBC/Radio-Canada employees but also to the companies that have a contract with CBC/Radio-Canada, including freelancers, independent producers, service providers and consultants. The Code of Conduct includes requirements to comply with laws and policies applicable to CBC/Radio-Canada. In addition, it sets out clear mechanisms to report concerns, breaches or wrongdoings.

Due Diligence Processes in Relation to Forced Labour and Child Labour in our Supply Chains and Activities

In 2023-2024, the Steering Committee started gathering data and developing a methodology to analyze our supply chain and activities with the help of the Risk Management team. We also conducted a market scan of available solutions to facilitate the identification of risks in supply chains.

Starting in 2024-2025, we will conduct a risk assessment of our supply chain to identify where risks pertaining to forced labour and/or child labour reside.

This assessment will allow us to develop an action plan based on the higher risks we identified in our supply chain.

Any child or forced labour higher-risk situation will be reviewed with the Risk Management team for proper mitigation solutions and reporting requirements.

Our training

We require all of our employees to complete mandatory training on the Code of Conduct. We do not currently have specific training on forced labour and/or child labour. Beyond this, training needs are tailored to suit employees' key functions and responsibilities. We also offer online training to our employees on the following procurement activities:



- What is sustainable procurement?
- The environmentally sustainable approach.
- Diversifying the supply chain.
- Vendor Code of Conduct.

The Vendor Code of Conduct training provides an overview of the Code and is available to all employees.

Measuring our Performance

CBC/Radio-Canada is committed to tackling risks of forced labour and child labour in its activities and supply chains.

In 2023-2024 no violations of the Vendor Code of Conduct were reported to us.

Starting in 2024-2025, we will create an action plan in order to measure our performance. The activities foreseen in 2024-2025 are as follows:

- Create a governance framework.
- Gain a better understanding of our higher-risk supply chain areas by conducting a supply chain risk assessment.



Activities and Supply Chains at Higher Risk of Forced Labour or Child Labour

As stated above, CBC/Radio-Canada has not currently identified the key areas posing a higher risk of forced labour or child labour.

In 2024-2025 fiscal year, CBC/Radio-Canada will be conducting a risk assessment to identify where greater forced labour and child labour risk exist.

Approval and Attestation

The report was approved pursuant to subparagraph 11(4)(b)(ii) of the *Act* by the Board of Directors of CBC/Radio-Canada.

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.

Michael Goldbloom
Chair of the Board
May 17, 2024
I have authority to bind CBC/Radio-Canada

Catherine Tait
President and Chief Executive Officer
May 17, 2024
I have authority to bind CBC/Radio-Canada