

Bill S-211 – Forced Labour in Canadian Supply Chains

Formal Report

Hi-Tech Seals Inc.

Entity Information

Legal Name: Hi-Tech Seals Inc.

Business Number: 122781925

Headquarters: Edmonton, Alberta, Canada

Branches: Calgary (AB), Winnipeg (MB), Newmarket (ON), Ste. Julie (QC)

Financial Reporting Year: January 1, 2023 – December 31, 2023

Revision Status: No, this is not a revised report.

Joint Report Status: No, this is not a joint report.

Supply Chain Legislation Reporting: No, the entity is not subject to reporting requirements under supply chain legislation in another jurisdiction.

Business Categorization

Canadian Business Presence:

- Has a place of business in Canada
- Does business in Canada
- Has assets in Canada

Size-Related Thresholds:

- Has at least \$20 million in assets for at least one of its two most recent financial years
- Has generated at least \$40 million in revenue for at least one of its two most recent financial years

Sectors/Industries:

- Manufacturing
- Wholesale trade



Activities and Supply Chain

Structure: Corporation

Activities:

- Producing goods in Canada and outside Canada
- Selling goods in Canada and outside Canada
- Distributing goods in Canada and outside Canada
- Importing into Canada goods produced outside Canada

Supply Chain Overview:

Hi-Tech Seals is a privately owned corporation that specializes in the distribution of elastomeric and plastic seals and components. The company also manufactures specialized components through CNC machining, knife-cutting, urethane casting, and kit assembly. Hi-Tech Seals partners with manufacturing facilities in North America, Europe, and Asia.

Measures Against Forced and Child Labour

Steps Taken to Prevent and Reduce Risks (2023):

- Mapping activities
- Mapping supply chains
- Monitoring suppliers
- Developing and implementing grievance mechanisms

Detailed Description of Steps Taken:

Hi-Tech Seals has monitored and identified the locations of strategic trading partners globally. The company continuously assesses supply channels to ensure partners conform to ethical expectations. Efforts include tracing raw material origins, visiting supplier factories, and using a third-party provider, Grant Thornton, for ethical business practice reporting.

Policies and Due Diligence Processes:

- Embedding responsible business conduct into policies and management systems
In 2024, Hi-Tech Seals formalized and documented its approach to ethical behaviors in supply channels. The company implemented a Supplier Code of Conduct, which is provided to all vendors. This document outlines expectations, reporting obligations, and consequences for non-compliance.



Risk Identification and Remediation

Risk Identification:

- No, the entity has not started the process of identifying risks related to forced or child labour.

Identified Risks in Sectors/Industries:

- None identified.

Measures to Remediate Forced or Child Labour:

- Not applicable, no forced or child labour identified.

Measures to Remediate Loss of Income to Vulnerable Families:

- Not applicable, no loss of income to vulnerable families identified.

Training and Effectiveness Assessment

Training on Forced and Child Labour:

- No formal training provided in 2023.
In 2024, Hi-Tech Seals has initiated the development of an in-house training program to educate staff on forced and child labour, making it a mandatory part of employee development.

Effectiveness Assessment Policies:

- No, the entity currently does not have policies and procedures in place to assess the effectiveness of ensuring that forced or child labour are not being used in its activities and supply chains.

Conclusion

Hi-Tech Seals Inc. is committed to ethical business practices, with significant steps taken in 2023 to map and monitor its supply chain. The company has implemented a Supplier Code of Conduct and is developing training programs to further enforce ethical standards. While no forced or child labour risks have been identified, Hi-Tech Seals is proactively working to refine its processes and enhance staff training in 2024.

