

## Response Summary:

# Forced labour in Canadian supply chains: submit a questionnaire

## Data Management Disclaimer

Entities and government institutions must complete this questionnaire if they have reporting obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act). If an entity or government institution is unsure whether they are required to report, refer to guidance on [how to prepare a report](#).

Entities must have their completed report approved by the appropriate governing body or bodies.

Completing this questionnaire, including attaching the PDF version of the entity's or government institution's report, is mandatory. The questionnaire is considered complete if all of the mandatory fields have been filled out and a report has been uploaded that meets all of the following requirements:

- Contains information addressing each of the legal 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;
- Does not exceed 10 pages in length, or 20 pages for reports provided in both Canadian official languages; and
- Is a PDF file that does not exceed 100MB in size.

For more information, please refer to the [guidance](#).

Failure to complete the questionnaire is considered an offence under subsection 19(1). All offences under subsections 19(1) and 19(2) are

punishable on summary conviction and a fine of not more than \$250,000. The questionnaire must be completed using information from activities undertaken during the entity's or government institution's previous financial year before the reporting deadline of May 31, 2024.

There is no prescribed level of detail required for the responses. Entities and government institutions should use discretion in determining the appropriate level of detail proportionate to the size and risk profile of the entity or government institution.

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

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 Canada 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 Standard on Metadata and Public Safety Canada Library cataloguing and description procedures.

Entities and government institutions are also required to publish their report in a prominent place on their website, in accordance with section 8, for government institutions, and subsection 13(1), for entities. Learn more on [how to prepare a report](#).

An entity's failure to publish a report in a prominent place on its website is considered an offence under subsection 19(1).

Entities must complete the questionnaire and submit their report 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. Requests for translated copies of reports may be directed to the responsible entity.

Government institutions may complete the questionnaire in either official language, but are required to submit the PDF version of their report in both English and French, as per the *Official Languages Act*.

Privacy Notice.

## **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)*.**

**Participation in this questionnaire is mandatory for entities and government institutions that are required to report under the Act. Please note that information entered in any open text box field could be deemed 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 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](mailto: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.*

Q1.

### Identifying Information

Please note that information entered in any open text box field could be deemed 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.

\*This report is for which of the following?

- Entity

Q2. \*Legal name of reporting entity or government institution:

D&H Canada ULC as a wholly owned subsidiary of D&H Distributing Co.

Q3. \*Financial reporting year (Start Date):

<b>Month</b>	May
<b>Day</b>	1
<b>Year</b>	2023

Q4. \*Financial reporting year (End Date):

<b>Month</b>	April
<b>Day</b>	30
<b>Year</b>	2024

Q5. \*Is this a revised version of a report already submitted this reporting year?

**Note that Public Safety Canada is only accepting revised reports at this time. The previous version will be deleted and users will be unable to recover the previously submitted version.**

Error rendering response (QID13, Ref.ID cdc95948-b938-428e-adf4-0baf9b890e21): java.lang.NullPointerException

**Q7. Business number(s) (if applicable):**

N/A

**Q8. \*Is this a joint report?**

- Yes

**Q9. \*If yes, identify the legal name of each entity covered by this report.**

D&H Canada ULC  
D&H Distributing Company

**Q10. Identify the business number(s) of each entity covered by this report, (if applicable).**

**Q11. \*Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?**

- Yes

**Q11b. \*If yes, indicate the applicable law(s). Select all that apply.**

- California's Transparency in Supply Chains Act

**Q12. \*Which of the following categorizations applies to the entity? Select all that apply.**

- Has a place of business in Canada
- Does business in Canada
- Has assets in Canada
- 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
- Employs an average of at least 250 employees for at least one of its two most recent financial years

**Q13. \*Which of the following sectors or industries does the entity operate in? Select all that apply.**

- Wholesale trade
- Retail trade
- Transportation and warehousing

**Q14. \*In which country is the entity headquartered or principally located?**

- United States of America

**Q16.**

## **Annual Report**

**\*What steps has the entity taken in the 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.**

- 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
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- Developing and implementing child protection policies and processes
- 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
- Monitoring suppliers

**Q18. Please provide additional information describing the steps taken (if applicable) (1500 character limit).**

D&H's policies and principals relating to the prevention and reduction in the use of forced labour or child labour at any step of the production of goods are set forth in its Supplier Code of Conduct which can be found here: <https://www.dandh.com/v4/view?pageReq=suppliercodeofconduct>. D&H's Vendor partners acknowledge that the Supplier Code of Conduct sets out audit standards that D&H may use to determine whether Supplier is meeting the requirements set out in the Code of Conduct.

**Q19. \*Which of the following accurately describes the entity's structure?**

- Corporation

**Q20. \*Which of the following accurately describes the entity's activities? Select all that apply.**

- in Canada
- outside Canada
- Importing into Canada goods produced outside Canada
- Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

**Q25. \*Has the organization identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

- Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

**Q22. Please provide additional information on the organization's structure, activities and supply chains (1500 character limit).**

D&H has been a leader in the North American distribution market for 105 years, supporting many technology-led industries. D&H has corporate offices/logistics centers in Pennsylvania, Atlanta, Chicago, California, Tampa, Vancouver, and Toronto. D&H supports over 20,000 channel partners, including corporate resellers, national service providers, the largest consumer retail and eetail partners, federal and SLED solution providers, and managed services partners. In alignment to its North American partner base, D&H supports a portfolio of over 400 vendors and services manufacturers/OEMs.

**Q23. \*Does the organization currently have policies and due diligence processes in place related to forced labour and/or child labour?**

- Yes

**Q23b. \*If yes, which of the following elements of the due diligence process has the organization implemented in relation to forced labour and/or child labour? Select all that apply.**

- Embedding responsible business conduct into policies and management systems

**Q24. Please provide additional information on the organization's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1500 character limit).**

D&H's Supplier Code of Conduct, which outlines its expectations and policies regarding forced labour and child labour can be found at <https://www.dandh.com/v4/view?pageReq=suppliercodeofconduct>.

**Q25c. \*If yes, has the organization 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, sells, distributes or imports

**Q26. \*Has the organization 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.**

- Other, please specify::  
Technology Supply Chain

**Q27. Please provide additional information on the parts of the organization'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) (1500 character limit)**

D&H recognizes the need for technology companies to drive awareness and corporate action as it relates to combatting forced labour in their supply chains. As a distributor of technology products, D&H maintains and enforces and Supplier Code of Conduct (<https://www.dandh.com/v4/view?pageReq=suppliercodeofconduct>). D&H fully vets its vendor partners to corporate integrity, responsible product sourcing, and the safety and wellbeing of workers across the global supply chain.

**Q28. \*Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

- Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

**Q29. Please provide additional information on any measures the organization has taken to remediate any forced labour or child labour (if applicable) (1500 character limit).**

N/A

**Q30. \*Has the organization taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?**

- 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.

**Q31. Please provide additional information on any measures the organization has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable) (1500 character limit).**

N/A

**Q32. \*Does the organization currently provide training to employees on forced labour and/or child labour?**

- Yes

**Q32b. \*If yes, is the training mandatory?**

- No, the training is voluntary.

**Q33. Please provide additional information on the training the organization provides to employees on forced labour and child labour (if applicable) (1500 character limit).**

D&H makes courses available on Supply Chain Transparency.

**Q34. \*Does the organization 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?**

- No

**Q35. Please provide additional information on how the organization assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable) (1500 character limit).**

D&H's principles regarding forced labour and child labor are reflected in its Supplier Code of Conduct ("Code of Conduct"), which establishes the standards that D&H expects its Suppliers to adhere to, regarding:

- Supplier's treatment of workers;
- workplace safety;
- the impact of Supplier's activities on the environment; and
- Supplier's ethical business practices.

The Code of Conduct applies to all Suppliers that provide products to D&H for resale. Supplier is responsible for compliance with the standards set out in this Code of Conduct throughout its operations and throughout its entire supply chain.

D&H's vendor partners are required to self-report any violations of the Code of Conduct and may not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behavior.

D&H may immediately terminate its business relationship (including any purchase orders and contractual agreements) with a Supplier/Vendor who fails to comply with this Code of Conduct.

**Q36a. \*Upload report (Required) (100MB limit):**

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

[\[Click here\]](#)

**Q36b. Upload report in second Canadian official language (Optional) (100MB limit):**

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

N/A

**Q37.**

- **\*** 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.