



# International Nameplate Supplies Limited

1420 Crumlin Road, London, Ontario, Canada N5V 1S1 1-800-565-3509 (519) 455-7647 fax; (519) 455-4409

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## Introduction

This report is International Nameplate Supplies Limited (“INPS”) response to Bill S-211, An Act to support the fight against forced labour and child labour in supply chains and to amend the Customs Tariff.

INPS satisfies the definition of an Entity within the Act by having a place of business in Canada, doing business in Canada, having assets in Canada and meeting both the revenue and asset thresholds.

The financial reporting year of INPS Canadian group of companies covered by this report is for various periods within 2023 and pertains to INPS Canadian group of companies including North American Transit Supply Corporation, Ultrahund Inc, INPS Environmental Products Inc. and Advanced Power Dynamics Inc.

## Structure, Activities and Supply Chain

### Structure

International Name Plates Supplies Limited was established in London, Ontario in 1966 and has various manufacturing facilities across North America. Our Canadian group of companies, consists of North American Transit Supply Corporation, Ultrahund Inc., INPS Environmental Products Inc. and Advanced Power Dynamics Inc.

### Activities

INPS business operations involve both manufacturing and wholesale trade. We import both raw material for future processing and finished goods directly for resale for graphic, transit, fleet, and original equipment manufacturer (OEM) solutions.

There are a total of 500 employees that work for INPS and are distributed across North America.

### Supply Chain

The main categories of goods procured by INPS include materials for our manufacturing processes. Our material suppliers are located in the United States of America (USA), followed closely by North America, with small quantities being purchased from overseas suppliers. Note, this analysis was performed over material suppliers which, for the purposes of this report, are those suppliers who account for at least 1% of INPS’ total procurement spend over the 2023 fiscal year.

## Policies and Due Diligence

INPS has the following policies and due diligence procedures in place to mitigate the risk of child labour and forced labour within our internal activities.

### Internal Policies

#### Human Rights Policy

This policy sets out guidelines to ensure employees are treated ethically and to protect the



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human rights of all employees associated with INPS' operations. The policy also applies to all suppliers that partner with INPS and requires all suppliers to uphold the requirements set forth in the policy within their supply chains. Key principles embedded within this policy include prohibition of all forced labour including transporting, harboring, recruiting, transferring or receiving employees through threat, force, coercion, abduction or fraud for labour or services. The policy explicitly states that all work must be voluntary, with employees having the right to terminate their employment at any time. Embedded within this policy is the minimum employable age for employees, which is fifteen (15) years and older.

Additionally, within this policy, there are provisions to prevent harsh or inhumane treatment of employees including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse towards employees, with commensurate disciplinary policies and procedures in support of these requirements.

## Workplace Harassment Policy

This program describes the various ways in which employees who have been subjected to harassment, discrimination or any form of unethical treatment can table their concerns/issues through a dedicated confidential channel to report all instances of unethical treatment for prompt resolution to prevent forced labour.

## Supply Chain Risk Assessment

A risk assessment over INPS' industry of operation, goods procured and countries wherein goods are procured from has been performed over material direct suppliers in 2023 fiscal year. This risk assessment used two separate indices to conclude on inherent risk of child and/or forced labour related to goods and countries - Walk Free's Global Slavery Index and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor.

INPS operates within the industry of manufacturing and wholesale trade and has a small portion of its procurement activity with overseas suppliers. Given the two indices noted above, there is identified risk of child labour and forced labour inherent to manufacturing and wholesale trade and the location of where some of its goods are procured. Therefore, we recognize that there may be potential inherent forced or child labour risks in our supply chain and are instituting measures to ensure adequate oversight and due diligence on our suppliers.

## Remediation of Forced and Child Labour

To mitigate the risk of child labour and forced labour within our supply chains, INPS currently has no mechanism at this time, but we are instituting the following measures for supplier due diligence:

1. Material suppliers have been asked for their policies on forced/child labour. We plan to increase this activity by asking more suppliers for their policies in the next fiscal period.
2. We are in the process of analyzing our supply pipeline to identify suppliers that may be at risk for forced/child labour.
3. Development of a supplier onboarding questionnaire is in the discussion stage. We will



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do our best to reduce the risk of child/forced labour by sending questionnaires to select material suppliers, we will rely on them to perform the same due diligence on their respective supply chains.

## Remediation of Vulnerable Family Income Loss

INPS is in the process of understanding and evaluating its supply chain related to the risk of child labour and forced labour. To date, INPS has not identified instances of the use of child labour or forced labour within their operations or those of suppliers. As we have not observed any child/forced labour activity, we have not taken any measures to remediate any loss of income. We will investigate any perceived child/forced labour activity and provide remediation on a case-by-case basis.

## Employee Training

Our stance on Child/Forced labour can be found in our policy documents available to all employees. INPS does not have training in place on the topic of child labour or forced labour, however we recognize the opportunity to enhance employee training relevant to this Act, and therefore, will be evaluating applicable training for staff in the foreseeable future.

## Effectiveness Assessment

Bill S-211, being a relatively new reporting requirement, has not been in effect long enough to quantify the effectiveness of our processes and policies.

In the upcoming fiscal year, we will keep track of employees trained, and questionnaires returned from suppliers to assess our effectiveness on compliance with the Bill S-211 Act.

## Attestation

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 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.

**Full Name:** David Humann

**Date:** 2024-05-22

**Title:** President

**Signature:** 

I have the authority to bind 'INPS Canadian Group of Companies' and this report covers financial year 2023 and applies to 'INPS Canadian Group of Companies'.