



# Fight Against Forced Labour and Child Labour in Supply Chains

April 2023 – March 2024 Annual Report



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## About this Report

This report is prepared pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) (in effect since January 1, 2024). It sets out the commitment, renewed annually, by the University of Ontario Institute of Technology (“Ontario Tech University”) targeted by the legislation to prevent modern slavery, child labour, forced labour, and human trafficking in all activities and relationships with partners.

## About Us

Ontario Tech University is a forward-thinking institution, committed to embracing and shaping the future. The university is dedicated to upholding compliance through integrity, ethical behavior, and good governance. The university values integrity by promoting equity, fairness, kindness, and ethics. Encouraging innovation and striving for excellence can shape Ontario Tech University’s approach to sourcing goods and services. Furthermore, the university’s commitment to social change can impact procurement practices by seeking suppliers that adhere to ethical and sustainable standards. Integrating ethical considerations into its procurement processes contributes to the fight against forced labour and child labour.

## Steps Taken to Prevent and Reduce Risks

Over the last fiscal year, Ontario Tech University began compiling a comprehensive list of all suppliers we directly purchase goods from outside of Canada. This will allow us to review and take appropriate measures to prevent and reduce risk related to forced and child labour.

- We will contact each identified supplier outside of Canada to affirm its commitment to ethical sourcing practices, specifically regarding forced and child labour, request written attestations from suppliers affirming non-engagement or support of forced labour or child labour.
- We will continue to collaborate with industry peers by engaging with other universities, and relevant industry associations to share best practices, collaborate on ethical sourcing initiatives, participate in industry working groups or forums dedicated to addressing issues related to forced and child labour.
- We will integrate the outcomes of supplier mapping, attestations, and due diligence processes into the university’s procurement policies and procedures, ensuring that ethical sourcing considerations are embedded throughout the procurement lifecycle, from supplier selection to contract management.

## Structure, Activities and Supply Chains

Ontario Tech University is defined as a corporation without share capital and consisting of the members of its Board of Governors. Ontario Tech University has policies, processes, and structures in place to promote effective operation of the university to allow it to fulfill its mandate and meet its objectives.

As a university we follow the Broader Public Sector Procurement Directive. We import goods into Canada from outside the country to meet various operational needs. We procure laboratory equipment such as specialized instruments, chemicals, and supplies internationally to support our science and research departments. Additionally, we import technology and electronics such as computers, software, and audio-

visual equipment from global manufacturers to aid in administrative functions, classrooms, and student services. We also source maintenance supplies, equipment parts, and facilities management materials from global suppliers to ensure the proper upkeep of our campus buildings and grounds. These imports are essential for maintaining the high standards of education and services we provide for our students and staff.

Our Campus Store currently sells apparel and sundry supplies which are purchased from Canadian vendors and distributors. A very small percentage of textbooks are purchased from independent US publishers who have no Canadian distributor due to their small size.

## Policies and Due Diligence Processes

At Ontario Tech University we have comprehensive policies and due diligence processes in relation to forced labour and child labour. The following policies and procedures at the university include:

- **Procurement of Goods and Services Policy**
  - The university aspires to maintain the highest ethical, legal, environmental, managerial and professional standards in the management of resources that have been entrusted to it as a publicly funded institution. These standards can only be achieved in an environment that promotes and supports sound fiscal management and accountability, risk minimization, long-term sustainability, and social responsibility. To this end, the Procurement of Goods and Services policy is designed to define and guide in the management and control of financial expenditures in an open, fair, and transparent manner and in accordance with the broader regulatory requirements.
- **Procurement of Goods and Services Procedures**
  - The purpose of these procedures is to complement the Procurement of Goods and Services Policy by serving to define and guide individuals in fulfilling their responsibilities and obligations throughout each phase of the procurement process. These procedures are consistent with the Broader Public Sector Procurement Directive, Supply Chain Code of Ethics, Canadian Free Trade Agreement, Canada-European Union Comprehensive Economic and Trade Agreement, and have been developed to ensure that all goods and services are acquired by the university through a process that is open, fair and transparent.
- **Procurement Policy: Supply Chain Code of Ethics**
  - The purpose of the University's Supply Chain Code of Ethics is to define acceptable behaviours and standards that should be common for everyone involved with supply chain activities, such as planning, purchasing, contracting, logistics and payment. The code is not meant to supersede other university value statements or policies but rather to supplement them with supply chain-specific standards of practice.
- **Policy on Responsible Conduct of Research and Scholarship**
  - The purpose of this policy and its related procedure is to set out the standards, requirements and responsibilities that apply to the responsible conduct of research and scholarship at the university.
- **Respectful Campus Policy**
  - The Respectful Campus Policy outlines the university's commitment to promote and sustain a respectful and inclusive campus in accordance with the Ontario Human Rights Code, the Accessibility for Ontarians with Disabilities Act, and the Occupational Health and Safety Act. The purpose of the policy is to ensure the campus community is familiar with their various rights, roles, responsibilities, and obligations as they relate to preventing and responding to all forms of harassment and discrimination.

- **Ethical Conduct Policy**
  - The purpose of this policy is to promote standards of ethical conduct that advance integrity and accountability, and support the university's mission, vision and values.
- **Safe Disclosure Policy**
  - The university is committed to ethics, integrity, and compliance in all its activities. The purpose of this policy is to set out the principles for Good Faith disclosure of Improper Activity and to describe the university's response to concerns from such disclosures. The policy reflects the university's commitment to accountability and ethical conduct and supports the ability of university members to disclose concerns in good faith, without fear of reprisal. This policy is intended to address only disclosures that cannot be addressed under other policies or procedures that govern the subject matter of the disclosure.
- **Safe Disclosure Procedures**
  - The purpose of these procedures is to establish the processes for making and reviewing and/or investigating a Good Faith Disclosure under the Safe Disclosure Policy.

We are committed to enhance our policies and due diligence processes regarding forced and child labour, the university will:

- Revise the Procurement Policy & Procedure to require validation of suppliers outside Canada for compliance with forced and child labour standards. The definition of 'child' will encompass legal definitions and the minimum age for employment in respective countries.
- Update the supplier setup process to mandate self-attestation from all suppliers outside of Canada, confirming non-utilization of forced and child labour in their supply chains.
- Amend purchase order terms & conditions and competitive tendering documents to explicitly state that suppliers and subcontractors must refrain from engaging in or supporting child labour or any form of forced labour, such as indentured labour, bonded labour, or involuntary labour of prisoners.

## Steps Taken to Assess and Manage Risk

In 2024, we undertook an analysis of our operations and procurement practices particularly with respect to international imports and concluded that we have no supply chain risks with respect to forced labour or child labour particularly taken into account our de minimis (1.26%) import activity in fiscal year 2023 – 2024 and the sectors which these imports are coming from.

## Remediation Measures

As the university has not identified any forced labour or child labour in its supply chain, we have not taken any measures to remediate any forced labour or child labour or to remediate any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities or supply chains.

## Training

The university provides all legislatively required training to its employees as well as additional training on procurement and business ethics as applicable to the unit.

## Assessing Effectiveness

To assess the effectiveness of its policies and procedures regarding forced labour and child labour, Ontario Tech University will implement the following measures to establish a schedule for periodic reviews or audits of the organization's policies and procedures related to forced labour and child labour. This ensures ongoing compliance and identifies areas for improvement. We will also work closely with suppliers to assess the effectiveness of their actions in addressing forced labour and child labour. This can involve tracking supplier performance indicators related to labour practices and collaborating on improvement initiatives.

Ontario Tech University will assess its effectiveness in preventing forced and child labour by:

- Incorporating language and evaluation criteria into public tendering opportunities, especially in cases of elevated risk, to examine vendors' supply chain activities as part of the selection process.
- Including a strict adherence clause in agreements with suppliers, mandating the avoidance of child and forced labour in their supply chains. Breaching this clause may result in financial penalties or termination for cause.
- Actively investigating vendors from outside Canada with elevated risk by conducting internal investigations using web resources and requesting attestations from vendors affirming non-engagement or support of child and forced labour.
- Utilizing Ontario Education Collaborative Marketplace (OECM) and Ministry of Government and Consumer Services (MGCS) vendor of records whenever possible. These vendors have measures in place to address forced labour and child labour within their competitive tendering processes, providing additional assurance of ethical sourcing practices.

## Approval and Attestation

This report has been approved in accordance with the provisions of section 11(4)(a) of the Act by the Board of Governors of Ontario Tech University for the fiscal year ending March 31st, 2024.

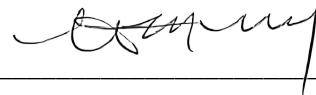
In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity list above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

**I have the authority to bind the University of Ontario Institute of Technology.**



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Laura Elliot  
Board of Governors Chair  
May 16, 2024



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Steven Murphy  
President and Vice-Chancellor  
May 16, 2024