



Fight Against Forced Labour and Child Labour in Supply Chains

April 2025 – March 2026 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”). It outlines Ontario Tech University’s processes, measures and progress made in the 2025-2026 fiscal year to prevent and mitigate the risks of modern slavery across the University’s supply chain. It also reaffirms the University’s commitment 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.

Structure, Activities and Supply Chains

Ontario Tech University is a public academic institution established in 2002 as a corporation without share capital by the Government of Ontario. Since its founding, the University has developed a strong reputation for integrating technology into teaching and research, with a focus on innovation, career readiness, and societal impact.

The University operates under the oversight of its Board of Governors, which is responsible for oversight of its property and finances, and the conduct of its business and affairs. This includes responsibility for strategic planning, risk management, and financial stewardship. The Board has established University policies, processes, and governance structures to ensure its effective operation, enabling it to fulfill its mandate and achieve its institutional objectives. For the 2025–2026 fiscal year, the University operated with a substantial budget supported primarily by tuition revenue, government grants, and other funding sources.

The Chancellor serves as the ceremonial head of the University and confers degrees, diplomas, and certificates. The President and Vice-Chancellor is the University’s chief executive officer and is responsible to the Board for the leadership and administration of the institution, including the implementation of academic priorities and overall strategic direction. The President is supported by a senior leadership team responsible for overseeing both academic and administrative functions. Each member of this team provides leadership and advice within their respective areas of responsibility.

Ontario Tech University generally operates at the upper end of its supply chain, with multiple intermediary layers separating it from the earliest stages of raw material extraction and manufacturing. This positioning creates inherent challenges in fully tracing and mapping all tiers of the supply chain.

In carrying out its academic, research, and operational functions, the University relies on a broad network of suppliers and service providers across a range of sectors. These relationships support the procurement of goods and services required for teaching, research, and campus operations, including facilities maintenance, construction, and capital projects.

The vast majority of the University's purchases are for internal use. A small portion of goods, primarily textbooks, apparel, and sundry items and food products, is resold through the University's retail operations. These products are largely sourced from Canadian vendors and distributors. In limited cases, a small number of textbooks are purchased directly from independent U.S. publishers that do not have Canadian distribution channels due to their size.

In the 2025-2026 fiscal year, the University's total third-party expenditure on goods and services amounted to approximately \$79 million. Approximately \$400,000, were purchased for resale through the University's campus retail operations.

The University's supplier base is diverse and includes local businesses, independent contractors, construction and engineering firms, travel and accommodation providers, security services, and vendors supplying information technology equipment and other consumables. A substantial proportion of these suppliers are based in Canada. In the 2025-2026 fiscal year, approximately 86% of the University's purchase orders, by value, were issued to Canadian suppliers.

Goods imported by the University accounted for approximately \$1.3 million. Relative to the University's overall budget, imported goods represented approximately 1.6% of the University's total spending in 2025-2026.

Policies and Due Diligence Processes

At Ontario Tech University has comprehensive policies and due diligence processes in relation to forced labour and child labour including:

- **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.

The University is committed to enhancing its policies and due diligence processes related forced and child labour. In support of this commitment, the University:

- Strengthened University policies and due-diligence processes related to forced and child labour.
- Further aligned the Procurement Policy and Procedure with the requirements of the Act.
- Reinforced ethical sourcing expectations across the procurement lifecycle.
- Updated internal guidance materials to support consistent consideration of human-rights in supplier evaluation, contract development, and the review of higher-risk purchasing categories.
- Completed preparatory work to integrate the forthcoming OUPPMA sector training framework once released.
- Refined supplier due-diligence measures, including stronger validation requirements for international suppliers and improvements to supplier onboarding practices aligned with emerging human-rights awareness initiatives.
- Updated competitive bidding templates and purchase order terms to clearly prohibit forced and child labour, reinforce supplier accountability and strengthen subcontractor oversight.
- Continued to support the University's commitment to ethical and transparent supply-chain management.

Steps Taken to Assess, Manage, Prevent and Reduce Risks

Over the past fiscal year, the University continued to assess its operations and procurement activities for potential forced and child labour risks, with a review of purchasing patterns again confirming minimal exposure due to the low volume of international imports and the nature of the goods procured. No new risks were identified through this assessment.

In parallel, participation in sector initiatives led by OUPPMA and CASPAR strengthened institutional awareness of human-rights risks and enhanced the University's capacity to identify and manage potential concerns in future procurement cycles.

Over its past fiscal year, Ontario Tech University has continued to strengthen its approach to ethical procurement and the mitigation of human rights risks, including the risks of forced and child labour within its operation and supply chains. Our activities included the following key initiatives:

(i) Collaboration with OUPPMA to Develop a Provincial Training Framework

Building on previous efforts, the University has focused on sector collaboration and the development of training and awareness initiatives designed to enhance due diligence across the institution. The University actively participated in a sector wide initiative led by the Ontario University Professional Procurement Management Association (OUPPMA) to design a common training framework for procurement professionals on forced and child labour. This work aims to build shared provincial capacity to identify, assess, and address human rights risks throughout University supply chains.

The framework is structured as a multi module program to support progressive learning and strengthen compliance with Bill S-211 and other applicable ethical sourcing requirements. Key components include:

- **Module 1: Awareness of Human Rights in Supply Chains**
Provides foundational knowledge on procurement's role in preventing forced and child labour, outlines obligations under Bill S-211, and highlights indicators of elevated risk in global supply chains.
- **Module 2: Interacting with Internal Clients on Human Rights**
Supports procurement professionals in advising campus clients on legal, financial, and reputational risks, identifying high risk spend categories, and integrating ethical considerations into purchasing decisions.
- **Module 3: Interacting with Suppliers on Human Rights**
Offers guidance on setting expectations for suppliers, conducting due diligence, managing potential violations, and reinforcing the University's Supplier Code of Conduct.

This initiative represents a significant step forward in establishing consistent, sector wide standards for ethical procurement practices within Ontario's University system.

(ii) National Collaboration on Human Rights Awareness with CASPAR

In parallel with the provincial initiative, the University also participated in a national awareness project coordinated by CAUBO-ACPAU Sustainable Procurement/Approvisionnement Responsable (CASPAR) group, a Canadian forum focused on sustainable procurement in the post secondary sector.

This project involves the development of a human rights awareness video aimed at decentralized purchasers and other campus community members involved in buying activities outside of the central Procurement office. The video will:

- Increase awareness of forced and child labour risks and modern slavery concerns.
- Provide accessible guidance on ethical supply chain management.
- Support due diligence practices across campus, particularly among individuals involved in low value or distributed purchasing.

By contributing to this national initiative, the University is helping promote consistent understanding of human rights obligations across Canadian post secondary institutions.

(iii) Continued Integration of Ethical Sourcing into Procurement Practices

In addition to its collaborative initiatives, the University has continued to integrate ethical sourcing principles into its internal procurement processes. This included maintaining alignment of procurement templates, guidance materials, and documentation practices with the requirements of Bill S-211. Procurement staff also continued to share information with peer institutions and sector partners to support the ongoing development of best practices in ethical purchasing.

Remediation Measures

As the University did not identify any instances of forced labour or child labour within its operations or supply chain during the past fiscal year, no remediation measures were required. Likewise, no actions were necessary to address potential loss of income to vulnerable families, as no corrective steps to eliminate forced or child labour were undertaken. The University will continue to monitor its supply chain and remains prepared to implement appropriate remediation measures should any risks be identified in future assessments.

Training

The University continues to provide all required legislative training to employees, including guidance on ethical sourcing and procurement practices. As detailed above, the University also supported sector initiatives through OUPPMA and CASPAR to strengthen awareness of human-rights risks in supply chains, which will inform future training for procurement staff and decentralized purchasers.

Assessing Effectiveness

To assess the effectiveness of its policies and procedures regarding forced labour and child labour, Ontario Tech University implemented measures to establish a schedule for periodic reviews or audits of its practices. These reviews ensured ongoing compliance and helped identify opportunities for improvement. The University also worked closely with suppliers to evaluate the effectiveness of their efforts in addressing forced labour and child labour. This included monitoring supplier performance indicators related to labour practices and collaborating on improvement initiatives.

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

- Continued to assess the effectiveness of its efforts to prevent forced and child labour within University operations and supply chain.
- Review procurement documentation and processes to ensure continued alignment with the requirements of the Act,

- Maintained the ongoing use of standardized ethical-sourcing language in tendering and contract documents.
- Continued monitoring practices for international suppliers, including review of import activity or supplier attestations.
 - Confirmed that no issues were identified through supplier or import reviews.
- Encouraged the use of established vendor-of-record programs, such as Ontario Education Collaborative Marketplace (OECM), which incorporate their own due-diligence measures and support responsible sourcing.
- Supported effectiveness through participation in sector-wide initiatives to strengthen procurement awareness and capacity.
- Collaborated with OUPPMA on the development of a provincial training framework.
- Participated in the national awareness project led by CASPAR.
- Enhanced institutional understanding of human-rights risks within procurement and supply chain activities.
- Used insights from sector collaboration to inform ongoing improvements to procurement practices.
- Reinforced the University's ability to identify potential concerns, maintain compliant processes, and support continuous improvement in ethical supply-chain management.

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, 2026.

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.



Laura Elliott
Board of Governors Chair
May 19, 2026



Steven Murphy
President and Vice-Chancellor
May 19, 2026