



Forced Labour in Canadian Supply Chains

Updated May 28, 2025

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Introduction

This report is The Canadore College of Applied Arts and Technology's response to comply with Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("the Act") for the financial year ending March 31, 2025. The reporting entity covered by this statement is The Canadore College of Applied Arts and Technology, business number 108075755. The Canadore College of Applied Arts and Technology is obligated to submit a report to the Minister of Public Safety and provide a public report in response the Supply Chains Act by May 31 annually.

For the purposes of the Act, The Canadore College of Applied Arts and Technology ("Canadore College" or the "College") meets the Entity definition as it has a place of business in Canada, does business in Canada, has assets in Canada and meets the threshold for revenue, assets and employees. Canadore College meets the definition of Reporting Entity, as it sells goods and distributes goods in Canada, imports into Canada goods produced outside of Canada.

Guided by its purpose to become the college of choice for connecting people, education and employment through applied learning, entrepreneurship, leadership, and innovation, Canadore College strives to be a leader in everything it does and expects its representatives to act with accountability, commitment to excellence, integrity, respect, responsiveness and flexibility and transparency.

Forced labour and child labour is contrary to the College's statement of purpose, vision, and values, therefore Canadore College does not endorse any human trafficking and modern slavery within its organization or any organization with whom it conducts business with.

Further, Canada College is committed to the implementation of the Truth and Reconciliation Commission recommendations that are relevant to post-secondary education, the principles of freedom of expression, equality, diversity and inclusion (EDI) and is committed supporting the 17 Sustainable Development Goals (SDGs) of the United Nations Sustainable Development Accord by considering the SDGs in research, campus operations and curriculum development, with a goal to become carbon neutral by 2031.

1. Structure, Activities and Supply Chain

Ontario Colleges, including Canadore College, were established under the *Ministry of Training, Colleges and Universities Act* and continue under the *Ontario Colleges of Applied Arts and Technology Act, 2002*. Canadore College offers certificate, diploma, as well as post-basic programs, designed to provide additional or advanced skills that will enhance an existing knowledge base for which a certificate, diploma or degree has been awarded.

Canadore College was established in 1972 as an Ontario College of applied arts and technology, operates as a publicly-assisted college in the Province of Ontario. As a result, the College receives funding from the Provincial Ministries of Colleges and Universities ("MCU") and Labour, Immigration, Training and Skills Development ("MLITSD"). The College is an agency of the Crown, operates as a not-for-profit organization and provides post-secondary education to full-time and part-time students. College operations are guided by the following pillars to ensure alignment of decisions and actions:

- Student Success
- Program and Service Excellence
- Connection to Community

- Financial and Environmental Sustainability
- Innovation and Entrepreneurship

The North American Industry Classification System (NAICS) Canada 2022 Version 1.0 was used to classify the sectors applicable to Canadore College's operations, supply chain and related activities.

Canadore College operates in the following sectors, sub-sector and related industry group:

- (61) educational services, (611) educational services, (6112) Community colleges and C.E.G.E.P.s

The College, operating as an independent educational institution, engages in procurement to support and enhance the furtherance of the College's mandate and Statement of Purpose, with a focus on applied and experiential learning and research. As such, the College acquires and renews instructional equipment and learning resources in order to deliver relevant, high-quality education and training. Additionally, procurement activities support the College's construction of new campus assets and the renewing and modernizing of campuses through the repair and renovation of existing campus infrastructure.

2. Policies and Processes in Relation to Forced and Child Labour

For this reporting period, Canadore College did not have any express language in its Code of Ethics, Operating or Corporate Policy Manuals related to forced labour or child labour, however individuals involved with purchasing or other supply chain activities must comply with Canadore College's Code of Ethics and the laws of Canada and Ontario.

Broader Public Sector (BPS) Accountability Act – Procurement Directive

Under the BPS Procurement Directive organizations must adopt a Supply Chain Code of Ethics in accordance with their governance processes. This Code of Ethics establishes the conduct of all members of an organization involved with supply chain activities. The Code of Ethics is provided in detail below.

Requirements and guidance provided within the Procurement Directive covers the following areas: segregation of duties, approval authority, competitive procurement thresholds, information gathering, supplier pre-qualification, posting competitive procurement documents, timelines for posting competitive procurements, bid receipt, evaluation criteria, evaluation process disclosure, evaluation team, evaluation matrix, winning bid, non-discrimination, contract execution, establishing the contract, termination clauses, termination of agreement modifications, contract award notification supplier debriefing, non-competitive procurement, contract management, procurement records retention, conflict of interest, bid dispute resolution and other related policies (e.g. contract law, law of competitive processes, privacy legislation, accessibility legislation, etc.)

Code of Ethics

Canadore College requires all individuals involved in supply chain activities within and between BPS organizations, suppliers and other stakeholders to act and be seen to act with integrity and professionalism. Honesty, care, due diligence and respect for each other and the environment are integral.

Participants must not engage in any activity that may create, or appear to create a conflict of interest, such as accepting gifts or favours, providing preferential treatment or publicly endorsing supplier or products.

Supply chain activities must also be open and accountable, in particular, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for public money. All participants are expected to ensure public sector resources are used in a responsible, efficient, and effective manner.

Individuals involved in purchasing or other supply chain activities are expected to continuously improve supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share leading practices.

Collaborative Purchasing

Canadore College has entered into various Vendor of Record Agreements with several vendors that cover a number of goods and services. These agreements were all established using existing collaborative agreements established through:

- Ontario Education Collaborative Marketplace (OECM)
- Kinetic GPO
- Canoe Procurement Group of Canada
- Silver Group Purchasing
- Supply Ontario
- Ontario Colleges Purchasing Managers Association (OCPMA)
- Ontario University Professional Procurement Management Association (OUPPMA)
- Collaboration with Nipissing University and;
- Other approved collaborative contracts or associations that Canadore College is permitted to access.

In compliance with Chapter 5, Article 516 of the Canadian Free Trade Agreement (CFTA), Chapter 19, Article 19.15 of the Canadian-European Union Comprehensive Economic and Trade Agreement, Chapter 9, Article 9.17 of the Ontario-Quebec Trade and Cooperation Agreement (OQTCA), Canadore College also publishes award information regarding procurements covered under these agreements on Bonfire.

Additionally, Canadore College complies with the Ontario Ministry of Finance's Broader Public Sector Procurement Directives, the CFTA, the Canadian-European Union Comprehensive Economic and Trade Agreement, and OQTCA.

Operational Policy Manual

This policy manual provides internal controls over Canadore College's competitive procurement process. Purchases exceeding \$5,000 must be completed through a competitive bidding process. The Operational Policy manual defines roles and responsibilities and the process by purchasing threshold for goods and/or services (e.g. \$5,000 to 24,999, \$25,000 to \$99,999 and \$100,000+). Certain purchases or expenditures are excluded from this policy such as regular payments such as utilities or telephone or expenditures in which there is only one supplier.

Corporate Policy Manual

This policy manual applies to all individuals providing volunteer services to Canadore College, through membership of the Board of Governors, the Foundation, capital campaign cabinets and all other volunteers who provide services to the College. The purpose of this policy is to ensure that volunteers are able to compete in procurement processes for goods

and services. Canadore College wishes to respect the integrity of the procurement process by ensuring that volunteers do not receive any real or perceived advantage in the procurement process.

Individuals and their companies that provide volunteer service to the College will not receive any advantage over other companies or individuals in the procurement process and that every attempt will be made to ensure that volunteers are not exposed to information that could provide them with an unfair advantage in a procurement process.

Canadore College's Director of Finance and Controller is responsible for ensuring the policy is administered within the procurement process for goods and services.

All volunteers are required to sign an acknowledgement of this Conflict-of-Interest Procurement Protection Policy included in the Corporate Policy Manual.

3. Identification of Forced and Child Labour Risk

To understand where in the supply chain forced or child labour risks may exist, Canadore College carried out a risk assessment process. This process was guided by insights provided by the Walk Free Global Slavery Index, the OECD Due Diligence Guidance for Responsible Business Conduct, and by the US Department of Labor's List of Goods Produced by Child Labour or Forced Labour. In conducting this supply chain forced and child labour risk analysis, Canadore College was able to highlight potential risks of forced or child labour associated with certain goods and certain countries.

The risk identification exercise does not presuppose the actual use of forced or child labour within Canadore College's operations or supply chains, rather, it is aimed at recognizing potential scenarios where such risks might arise, thereby further enabling us to implement effective preventative measures. The College's assessment acknowledges that no industry is entirely exempt from the risks of forced and child labour and there are inherent vulnerabilities within certain sectors of the College's supply chain, particularly in regions where regulatory frameworks and enforcement mechanisms might not be robust.

The analysis conducted considered specific geographic regions that, according to the Walk Free Global Slavery Index and other credible sources, present a higher risk of forced and child labour practices. This geographic risk assessment, was combined with an assessment of at-risk-goods categories, further enabling us to apply a targeted lens to the College's risk assessment.

Risk Assessment Findings

Canadore College's supply chain expenditures are predominantly linked to countries with significantly lower risks, such as Canada, and the United States. Canada alone accounted for 97.0% of the total spend during the reporting period. Furthermore, no incidents of forced or child labor were identified throughout the reporting period.

Canadore College also cross referenced the data from the US Department of Labor's List of Goods Produced by Child Labour or Forced Labour. This is an important step in isolating specific goods from Canadore College's import portfolio that may be susceptible to forced or child labour. When this data was compared against the portfolio of products that were imported, no products were identified that are subject to an elevated risk of being associated with forced or child labour practices.

Overall, the findings from the College's risk assessment suggest that there is minimal exposure to forced and child labour risks within the supply chain in the context of overall expenditures.

4. Remediation of Forced and Child Labour

Given no instance of forced or child labour were identified for the 2024-2025 reporting year in Canadore College's supply chain, no remediation of forced and child labour occurred for the reporting period.

5. Remediation of Loss of Income

Given no instance of forced or child labour were identified for the 2024-2025 reporting year in Canadore College's supply chain, no remediation of loss of income occurred for the reporting period.

6. Employee Training

For this reporting period, Canadore College partnered with an external consultant to develop two distinct training programs. The first training session focuses on general awareness for a broader audience, while the second is technical in nature and is specific to the procurement team.

The procurement team completed the training in March 2025. The general awareness training will be incorporated into mandatory training for a broader audience, effective in the fiscal year 2025-2026.

Procurement policy training is available on an as needed basis and as part of onboarding new employees. Additional training is available at the request of departments and program areas.

7. Assessing Effectiveness

For this reporting period, Canadore College took significant steps to improve its capacity to address the risks of forced or child labour in its supply chains. The College partnered with an external consultant to develop two distinct training programs: a general awareness session for a broader audience and a more technical training tailored for the procurement team.

The procurement team completed training in March 2025. The general awareness training will be incorporated into mandatory training for a broader audience starting in fiscal year 2025–2026. Competitive Bidding Policy and Procedures training is also available on an as-needed basis, including during the onboarding of new employees. Additional training can be provided upon request from departments and program areas.

While these initiatives represent meaningful progress, the College acknowledges that it is still in the early stages of implementation. As such, a comprehensive assessment of the effectiveness of these measures is not yet possible. Future reporting periods will focus on evaluating the impact of these training programs and other related initiatives.

Policy manuals and procedures at Canadore College undergo an evaluation process minimally every three years as part of the Board's and management's regular policy review.

Canadore College is in the process of enhancing existing procurement policy language with respect to expanding on the guiding principles that govern procurement operations and expectations regarding ethical conduct and conflicts of interest in its procurement and supply chain.

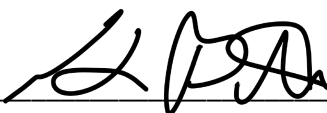
8. Approval and Attestation of the Report

In accordance with the requirements of the Act, and in particular Section 11, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable due 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: George Burton

Title: President and CEO

Date: May 28, 2025

Signature: A handwritten signature in black ink, appearing to be 'G. Burton', written over a horizontal line.

"I have the authority to bind The Canadore College of Applied Arts and Technology."