

Fighting Against Forced Labour and Child Labour in Supply Chains Act

Annual Report

(Fiscal Year ending March 31, 2024)

Introduction

Banff Centre exists for the advancement of creative potential that enriches our world and understands that modern slavery, in any form, is antithetical to advancing human expression, wellness and capacity. As reported in this inaugural annual report, Banff Centre is committed to developing internal policies and process that reflect and support its responsibility to complying with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”).

Organization Structure, Activities and Supply Chain

Banff Centre is a public post-secondary institution continued pursuant to the *Post-Secondary Learning Act* (Alberta) and located in Banff, Alberta. Provincially mandated to provide non-parchment adult education in the arts, cultural leadership and indigenous leadership, Banff Centre is governed by a board of governors comprised of the President and CEO and up to fifteen members appointed by the Lieutenant Governor in Council (6) and the members of the board (9).

Banff Centre’s core activities include arts and leadership programming ranging from short-duration sessions and seminars to multi-week residencies and practicums. Banff Centre also operates a conference and hospitality business that provides participants with meals and accommodation during their programming and supports mission-aligned conferences attended by third-party conference organizers.

Banff Centre does not produce or export any goods. However, Banff Centre imports the following items on a regular basis, mostly from the US (but manufacturing may be in Asia) and a small portion from the UK, Europe or directly from China: electronics, audio-visual equipment (media hardware, duplicating equipment), photo equipment and supplies, printmaking equipment and supplies, sculpture equipment and material, costume parts and material, piano parts, theatre light and rigging equipment, promotional items such as ceramic mugs. Sometimes, Banff Centre may have larger orders imported from outside Canada. An example is the Jenny Belzberg Theatre seating that was manufactured in Colombia.

Policies and Due Diligence

Many of Banff Centre’s policies and procedures are publicly available on its website at <https://www.banffcentre.ca/policies-procedures>. As of the date of this report, Banff Centre does not yet have a policy specifically addressing forced labour and/or child labour. As of the date of this report, Banff Centre does not have any due diligence processes in place related to forced labour and/or child labour.

Supply Chain Risks

Currently, Banff Centre has reviewed the Act and is gathering information about how best to comply with the spirit and intention of the Act by reviewing the supply chain policies of other post-secondary institutions and the position of existing suppliers regarding forced labour and child labour.

As of the date of this report, Banff Centre has not yet determined the level of risk that forced labour or child labour is used at any step of the production of good that are imported into Canada by Banff Centre. Once this work has been completed, Banff Centre will be able to make decisions regarding how best to prevent and reduce such identified risks.

Remediation Measures

Banff Centre does not currently have any measures in place to remediate any forced labour and/or child labour or loss of income to the most vulnerable families that results from any measures taken to eliminate the use of force labour and/or child labour in Banff Centre's supply chain. Once Banff Centre has determined the level of risk that forced labour or child labour is used at any step of the production of good that are imported into Canada by Banff Centre, it can begin to establish remediation measures and processes.

Training

As of the date of this report, Banff Centre's Manager of Procurement and Supply Management has attended an information session hosted by the Calgary Public Purchasing Group regarding the Act and is monitoring updates in this area from a number of industry-based communication and information services.

Evaluation

Banff Centre is not yet able to evaluate its effectiveness in ensuring that forced labour and/or child labour are not being used in its supply chains. Banff Centre has identified that it must first complete the following activities, which it endeavors to do as soon as is reasonably possible:

- Conduct an assessment of risks of forced labour and/or child labour in the organization's activities and supply chains. If risks are identified, develop and implement an action plan for addressing forced labour and/or child labour.
- Gather information on worker recruitment and maintain internal controls to ensure that all workers are recruited voluntarily.
- Develop and implement 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.
- Develop and implement anti-forced labour and/or -child labour contractual clauses.

- Develop and implement anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists.
- Require 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.

Approval

This report has been approved by the Board of Governors (the governing body of Banff Centre) as of May 24, 2024, and will be reviewed annually.

Dated: May 27, 2024



Chris Lorway, President and CEO, Banff Centre