



Southern Alberta Institute of Technology

Fighting Against Forced Labour and Child Labour Report

At Southern Alberta Institute of Technology (SAIT), our first principles are fairness, integrity, respect, safety and transparency (FIRST). We are committed to applying these FIRST principles in all we do, including our business dealings and relationships. We do not tolerate forced labour or child labour anywhere in our supply chain. It is important to SAIT that FIRST principles apply to the workers within and throughout our supply chains and we strive to make this a reality.

This is SAIT's first report pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. Our report outlines the measures we have in place and the efforts we have commenced to assess and address the risks of forced labour and child labour in our business and supply chain.

Our organisational structure and business operations

The Board of Governors of the Southern Alberta Institute of Technology (the Board) is the permanent governing body of SAIT and makes and administers policy. SAIT became a Board-Governed Institute April 1, 1982, and operates under the authority of the *Post-Secondary Learning Act* in Alberta. The Board sets the mission for SAIT, is accountable and responsible for the educational and financial governance of SAIT and is responsive to the needs of the communities SAIT serves.

SAIT is a polytechnic institute offering career programs in technology and trades. SAIT employs approximately 2,300 people and has enrolment of 19,000 students. SAIT prepares our students for their careers by offering skill-oriented programs through our nine schools, all focusing on a different field: MacPhail School of Energy, Advanced Digital Technology, Business, Construction, Health and Public Safety, Hospitality and Tourism, Manufacturing and Automation, and Transportation. Within each school, instructors bring their industry expertise to students who learn through a combination of theory and action-based learning.

SAIT also operates Applied Research and Innovation Services in four areas: Advanced Manufacturing and Materials, Unmanned Aerial Systems, Clean Unconventional Technology Solutions, and Green Building Technologies. SAIT conducts applied research in its 77,000 square feet of specialized research labs and facilities. We have full-time research staff dedicated to providing services that organizations need to take their products from concept to prototype.

Our supply chain and risks

We have assessed our risk profile within our own operations as low, based on country, sector and industry risks. All of our workers are employed in Canada, and we have fair and responsible employment practices in place to protect and promote workers' rights.

SAIT purchases a broad range of goods related to provision of educational services to students and applied research and innovation services. This includes office supplies, kitchen equipment, furniture, promotional items, drones and scientific research equipment. We also purchase technology including computers, mobile telephones and other products related to our applied research and innovation services. These goods are purchased primarily from reputable suppliers in Canada, the United States and Europe and manufactured in Asia, Europe, North America and South America.

We recognise that risks of forced labour may be present in our supply chain, mainly due to the location of certain manufacturers and the difficulty in identifying all raw material suppliers (particularly Tier 2 or 3 suppliers). Raw materials for computers, mobile phones and other products are sourced from numerous unknown sources. Since a majority of such workers are not employed directly by SAIT, we have less control and visibility over their working conditions and employment terms and we continue to tailor our risk management actions to address those risks. We are aware that

there is a higher risk of forced labour and child labour due to the higher prevalence of such practices in the raw materials industry and in certain countries (in particular, certain regions within South America and Asia).

SAIT also engages International agents who are authorized to assist future international students applying to SAIT. These agents are located in various countries worldwide. We recognize that there is an elevated risk due to the higher prevalence of forced labour and child labour in certain countries (including certain regions within South America and Asia).

SAIT strives towards mitigating these risks through high standards of due diligence and processes to monitor for and avoid forced labour in all environments in which SAIT operates and sources from, including developing and implementing those policies, processes and actions discussed in this report.

Our policies and procedures

FIRST PRINCIPLES: SAIT's FIRST principles of fairness, integrity, respect, safety and transparency apply throughout our organisation. These first principles consist of:

Fairness: We treat all people fairly and equitably, provide equal employment opportunities and engage in fair competition.

Integrity: We carry out SAIT business with honesty, integrity and due diligence. We honour commitments, are accountable for our actions, and follow through on promises and agreements.

Respect: We respect the dignity and human rights of people. We provide a safe environment where people can speak freely. We enhance human development in the workplace, the marketplace and the community.

Safety: We foster positive health practices and ensure safe, secure, environmentally sound working and learning environments.

Transparency: We conduct our work and communicate in a truthful and open manner. We disclose information in a timely way, respecting confidentiality and privacy. We engage in transparent accounting and financial reporting.

Our FIRST principles policy is available here: <https://www.sait.ca/about-sait/governance/ethical-principles>

Our Policies and Procedures: Within our organization, we have established policies and procedures to ensure our FIRST principles are applied to all our employees, which all employees must read and follow.

Our **Discrimination – Education Policy and Procedure** prohibiting discrimination against any applicant or associate based on SAIT protected characteristics. Our commitment to equal dignity and rights without discrimination applies to all persons involved in our operations and prohibits unlawful discrimination by any employee, including supervisors and coworkers.

Our **Respectful Workplace and Learning Environment Policy and Procedure** that sets out our core values and standards applicable to all directors, officers and individuals who are a part of the SAIT community. We have a responsibility to ourselves, our customers and our community to do the right thing by treating all members of the SAIT community with dignity and respect. To be successful in this endeavour, we've established our Respectful Workplace and Learning Environment Policy and Procedure to ensure we control possible hazards of discrimination and harassment that could arise in the workplace.

SAIT has established a **Conflict of Interest Policy and Procedure** to ensure our employees comply with the laws and regulations applicable to our business and to maintain the highest standards integrity in all their business relationships. We expect all members of the SAIT community to act fairly and impartially at all times in carrying

out their duties and cannot place themselves in a position where their judgement and/or impartiality may be reasonably questioned.

SAIT makes sure all employees and members involved in business shall be treated fairly and without reprisal when bringing forward information concerning a wrongdoing. As part of our **Wrongdoing Disclosure Policy and Procedure**, we expect and encourage all employees and members involved with SAIT to report any suspected violations or concerns as to compliance with laws, regulations, our Code of Conduct or other company policies to the Ethics Hotline, the designated officer or the public interest commissioner.

SAIT's Employee Policies and Procedures can be found on our website at: <https://www.sait.ca/about-sait/policies-and-procedures/employee-services>.

Our suppliers and FIRST Principles

SAIT seeks to do business with suppliers that value fairness, integrity, respect, safety and transparency. We have conducted an internal assessment of risks of forced labour and or child labour in our organization's activities and supply chains. Our risk assessment is threshold consideration in selecting and continuing our partnerships with our suppliers.

SAIT's due diligence process includes the implementation of contractual provisions with suppliers addressing their policies and procedures to identify and prohibit the use of forced labour and child labour in their activities and supply chains, requiring disclosure of any forced labour or child labour in the supplier's organization and supply chains, and confirming the supplier's compliance with *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. At present, this applies to SAIT's top 25 suppliers.

We are committed to continually reviewing and improving our approach to supplier due diligence with the aim of ensuring a more robust action plan to address forced labour risks

Training

We have issued communication throughout our campus to ensure all employees are aware of SAIT's obligations and commitments. We are enhancing our training program to make sure strategically targeted employees engaging in procurement are aware and capable of recognizing and reporting the risks of forced labour and child labour in our business and supply chain.

In order to further develop the above-mentioned policies, we plan to include information regarding forced labour risks in our employee onboarding materials (specifically, in our P2P - Procure to Pay Training). Taking a risk-based approach, we are also in the process of developing training for all employees who handle international transactions and imports on how to detect and report all forms of forced labour risks.

Remediation measures

Over the course of the reporting period, we have not identified any instances of forced labour or child labour in our business and supply chains, therefore, we have not been required to take remedial measures or to remediate any loss of income to vulnerable families.

Effectiveness in combatting forced labour risks

To date, SAIT has not yet assessed the effectiveness of our actions in preventing and reducing risks of forced labour in our activities and supply chain. Going forward, we will develop a system for evaluating our effectiveness in recording the number of staff trained, monitoring and assessing supplier compliance, and the number of reported breaches.

Approval

This report is made in accordance with Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and constitutes SAIT's forced labour report for the financial year commencing on April 1, 2023 and ending on March 31, 2024.

This report was approved by the Board of Governors of SAIT pursuant to Paragraph 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* on May 29th, 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 or 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.



By: _____

Dr. David Ross

President & CEO / SAIT, Board of Governor Member

Date: May 29th, 2024

I have the authority to bind SAIT