

## ANNUAL REPORT

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This annual report for the 2023 financial reporting year has been created by Cambrian College of Applied Arts and Technology (“**Cambrian College**” or the “**College**”) for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “**Act**”).

### **Our Commitment**

Cambrian College is committed to following the principles of fairness, transparency, and competition, while adhering to applicable trade agreements and the Broader Public Sector Procurement Directives set out by the Management Board of Cabinet and the Government of Ontario. The College is committed to preventing and reducing the risk that forced labour or child labour is used in the production of goods that Cambrian College imports into Canada.

### **Categorization, Sector and Industry**

#### **Cambrian College is an entity under the Act**

Cambrian College is an educational institution with campuses in Sudbury, Espanola, and Little Current, Ontario.

In terms of the Act’s threshold requirements, Cambrian College had at least \$20 million in assets for at least one of its two most recent financial years, it had generated at least \$40 million in revenue for at least one of its two most recent financial years, and it employed an average of at least 250 employees for at least one of its two most recent financial years.

#### **Our Operations**

Established in 1967, Cambrian College is a publicly funded post-secondary institution serving educational needs in Northern Ontario and beyond. It is one of 24 colleges in Ontario, with campuses in Sudbury, Espanola, and Little Current. The College has a vibrant global community of more than 4,700 learners studying in over 80 full-time and part-time programs. Cambrian College offers traditional, online, and flexible delivery programming year-round. The College serves a student population that is reflective of the rich diversity of today’s global workplaces.

## **Structure, Activities, and Supply Chains**

### **Our Structure**

Cambrian College is a corporation and was established pursuant to Section 2(1)2 of O. Reg 34/03 under the *Ontario Colleges of Applied Arts and Technology Act, 2002*. The College is overseen by a Board of Governors.

### **Our Supply Chain**

Cambrian College sells, distributes, purchases and imports into Canada goods that are produced outside of Canada. The College purchases and imports necessary goods, including specialized or scientific goods and equipment such as power supplies, automotive and other teaching materials.

Any purchases made by Cambrian College are centralized to its Purchasing Services team, who is responsible for determining the appropriate type of procurement and competition that best suits what is being purchased; and what is required by law, regulation, and/or applicable policies. To purchase the required goods, the College utilizes vendor of record agreements through various group purchasing organizations, Ontario Education Collaborative Marketplace (“**OECM**”) and Supply Ontario, where feasible. The College also conducts competitive processes to procure the required goods. In the previous fiscal year, Cambrian College’s main import suppliers were primarily located in the United States.

Finally, the College sells certain goods including apparel, textbooks, and food and distributes certain prototypes to various companies in mining and hospital sectors.

### **Steps taken by Cambrian College in Prior Financial Year**

In addition to the policies and due diligence processes set out below, Cambrian College took the following steps to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada:

- Cambrian College’s budget framework allows it to preplan its procurements, which allows the College to conduct competitive processes that align with the Broader Public Sector Directives and trade agreements.
- In its previous fiscal year, Cambrian College began gathering information on its vendors and imported goods to start the process of mapping its activities and supply chain. The College has also begun collecting information on its vendors to better align with *Building Ontario Businesses Initiative Act, 2022*.

- Through its internal and external job postings, the College can gather data on who applies to roles and how they are selected. The College also has a Social Insurance Number verification process. This helps to ensure that all employees hired by the College can work in Canada and are paid, thus mitigating the risk of child labour.
- Cambrian College's investments portfolio managers review the College's portfolio to mitigate the risk that the College has investments in high-risk regions.

### **Policies and Due Diligence Processes**

Cambrian College has policies and due diligence processes that embed responsible business conduct into its policies and management systems. For example:

- Where feasible, the College utilizes the vendor of record agreements with various group purchasing organizations such as OECM and Supply Ontario, which impose requirements on its suppliers for ethical procurement. For example, OECM requires its suppliers and subcontractors to implement and document ethical business best practices, including producing goods without the use of child labour.
- The College's Procurement Policy includes a section on "Supply Chain Code of Ethics", which affirms the College's commitment to fair and transparent supply chain and to improve supply chain policies and procedures.
- The College's existing construction and trade contracts, such as electrical services and plumbing, specifies that the workers must be competent, qualified, and experienced. This mitigates the risk of child labour and helps to ensure that the contractor hires workers that are paid at a rate higher than the minimum wage.

### **Forced Labour and Child Labour Risks**

Cambrian College has started the process of identifying risks of child labour and forced labour. The College has identified that there may be risks in: (i) the types of products it sources; (ii) the suppliers further down the supply chain than tier three; and (iii) the activities and supply chains related to retail trade. No specific instances of forced or child labour have been identified to date.

To assess and manage such risk, Cambrian College plans to educate its workforce, discourage its workforce from associating with high-risk suppliers, and incorporate clauses that help to mitigate the risk of forced or child labour in its contracts with suppliers. The College also expects that by procuring more of its goods from Ontario to be better aligned with the *Building Ontario Business Initiative Act, 2022* will help to ensure that the risk of forced or child labour in its supply chain is mitigated.

Finally, the College also has two committees who are working on aiding the College in working towards some of United Nation's 17 Sustainable Development Goals. While these are still in the preliminary stages, Cambrian College anticipates implementing action items over the next fiscal year that will be supported by its procurement process.

### **Remediation Measures**

Cambrian College has started the process of identifying child labour and forced labour risks, but it has not begun the process of remediating any forced labour or child labour in its activities or supply chains.

### **Remediation of Loss of Income**

Cambrian College has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, the College has not undertaken any income remediation measures.

### **Training Provided to Employees**

Cambrian College provides regular employee training, including but not limited to training on Ontario's *Human Rights Code*, workplace violence, workplace harassment, and cultural diversity. In 2023, the College did not provide training to its employees on forced labour or child labour. However, in the subsequent reporting year, Cambrian College will assess what additional training specific to forced labour and child labour may be appropriate for its employees.

### **Assessing Effectiveness**

Cambrian College does not currently have specific policies or procedures in place to assess its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its supply chain. Going forward, the College will explore methods it can use to assess its effectiveness, including setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour and working with suppliers to measure the effectiveness of their actions to address forced labour and child labour.

### **Approval and Attestation**

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 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.



**IN WITNESS WHEREOF** the authorized signing officer(s) of Cambrian College of Applied Arts and Technology have executed this report as of the effective date of the signatures set out below.

**SIGNED**

) **CAMBRIAN COLLEGE OF APPLIED ARTS AND**  
) **TECHNOLOGY**

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)   
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May 27, 2024

**Date**

) **Name:** Kristine Morrissey

) **Title:** President

) I have authority to bind Cambrian College of

) Applied Arts and Technology