



FANSHAWE

Fighting Against Forced Labour and Child Labour in Supply Chains Act Report

Fanshawe College

Introduction

At [Fanshawe College](#) (Fanshawe or the College) we recognize that modern slavery remains prevalent around the world. We are a leading Ontario college and a global community of individuals focused on making change in the world today and are committed to playing our role in mitigating all forms of modern slavery, including child and forced labour (Modern Slavery) within our operations and supply chains.

In addition to Fanshawe's strategic plan, [Fanshawe College Strategic Goals and Commitments 2020-2025](#) including [Revised Goals and Commitments](#) from 2022-2023 that identifies *improving environmental and social sustainability at Fanshawe through cross-college efforts aligned with the UN Sustainable Development Goals (SDGs) by developing an action plan with baseline measures (3.6)*, the College has launched various initiatives and is committed to evaluating its efforts in the upcoming years to enhance ethical practices in supply chain management. This report will serve to address these activities as set out in sections 11(1) and 11(3) of the **Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act)**.

Reporting Entity and Structure (Governance)

Fanshawe College is governed by a [Board of Governors](#) (the "Board") that is responsible for the governance of the College, including developing and overseeing the implementation of policies; setting the vision, mission, and direction for the organization; approving the College's annual business plan, budget and annual report; and ensuring the organization is effectively and appropriately managed to achieve its mandate.

Fanshawe College's governance framework is structured to ensure that it aligns with broader educational commitments and community responsibilities. The College operates under a set of guiding principles and plans that focus on inclusivity, representation, and accountability to its stakeholders, including students, faculty, and the surrounding community.

Fanshawe College has developed [Policies and Procedures](#) as a resource for staff, students and the wider College community. These documents are intended to guide decision-making around a number of topics, including student code of conduct, board governance and more. Policies and procedures are

developed to reflect Fanshawe's values and overall mission to provide pathways to success, an exceptional learning experience and a global outlook to meet student and employer needs.

The College employs approximately 2200 full and part-time faculty members, more than 1300 full and part-time staff members, and welcomes around 43,000 students each year, offering a variety of programs ranging from degree and diploma courses to certificates and apprenticeships.

Key Elements of the Governance Framework

Key elements of this governance framework include:

1. **Equity, Diversity, and Inclusion (EDI) Strategy:** This strategy, named "[A College Where We Belong](#)," emphasizes creating a sense of belonging across campuses. It aims to integrate EDI principles into the College's operations and academic environments. The strategy is guided by a task force that works on identifying priorities and setting goals based on the College's data and equity research.
2. **Indigenous Education Protocol:** Fanshawe has committed to improving and honoring Indigenous education through its Indigenous Education Protocol. This agreement involves prioritizing Indigenous education, respecting Indigenous governance structures, and implementing curriculum that reflects Indigenous intellectual and cultural traditions.
3. **Accountability and Engagement:** The College holds itself accountable through various mechanisms that engage both the internal community and external stakeholders. This includes regular reviews and updates of its strategic goals and community engagement initiatives.

These frameworks and protocols demonstrate Fanshawe College's commitment to governance that not only meets educational standards but also respects and integrates the diverse needs of its community. These strategies are designed to adapt and evolve in response to community needs and feedback, ensuring continuous improvement and alignment with educational and societal goals.

For more detailed information on Fanshawe College's governance, you can visit their official [website](#).

Supply Chains

Fanshawe College's procurement activities strive to adhere to all relevant public procurement regulations and applicable ethical sourcing practices. These activities span a wide array of goods and services, including construction, electronics, hospitality services, travel services, business equipment and supplies, laboratory equipment and supplies, books, printing services, and waste management. The central [Contract and Management Office \(CMO\)](#) oversees and monitors compliance with domestic directives, legislation, and international trade agreements. It also manages procurements through collaborative frameworks, notably with the [Ontario Education Collaborative Marketplace \(OECM\)](#) and other consortia, to leverage collective purchasing power and achieve cost efficiencies. In a decentralized environment, individual units handle procurement processes for transactions below the open competitive threshold (currently \$121,200) as defined by the [Broader Public Sector Procurement Directive](#).

Fanshawe College acknowledges the risk of modern slavery within its supply chains, recognizing that these risks may be heightened in certain areas due to factors such as geographic and material sourcing locations. There is a notable lack of visibility in some overseas markets, which may pose an increased

risk of modern slavery, particularly in secondary and further supply chain tiers and in the source materials used in the College's goods and services.

Fanshawe College's procurement activities are very diverse given the nature of its operations as a post-secondary institution. Accordingly, in the prior fiscal year, the College imported and purchased a significant number of goods. However, the vast majority of goods purchased by the College are purchased from Canadian suppliers. Our procurement activities included the purchase of apparel items, electronics, promotional products, office furniture, and paper-based materials.

Policies, Procedures & Due Diligence

The College has a number of policies and procedures which govern our activities and aim to reduce the risk of Modern Slavery in our operations and supply chains. Fanshawe incorporates social, governance, and ethical considerations into our current purchasing procedures, which are examined periodically. Employees are expected to consider the ethical and governance impacts of all purchasing decisions.

Information about some of the policies, procedures and due diligence measures are set out below:

Ontario Education Collaborative Marketplace OECM

The Ontario Education Collaborative Marketplace (OECM) incorporates sustainability and ethical practices in its supply chain selection through a strategic focus on Environmental, Social, and Governance (ESG) considerations. This approach is integral to their procurement processes. By embedding ESG principles into their sourcing criteria, OECM aims to prioritize suppliers who demonstrate sustainable practices and ethical business operations, including the assertion of no child or forced labor.

To seek compliance with these standards, OECM has developed a Supplier Code of Conduct that all partners are expected to adhere to. This code sets clear expectations for ethical behavior and sustainable practices. OECM's procurement process includes evaluations for compliance with this code, thereby fostering a supply chain that upholds the values of environmental stewardship and social responsibility, including the assertion of no child or forced labour.

Furthermore, OECM's Supplier Recognition Program (SRP) supports these efforts by acknowledging suppliers who excel in delivering sustainable and ethical services and products. This program not only motivates suppliers to maintain high standards but also promotes continuous improvement in sustainability and ethics across the supply chain.

As part of the OECM procurement process evaluation, the supply chain is evaluated, including for the presence of child and forced labour.

With the upcoming implementation of Workday, Fanshawe intends to add a number of supplier Agreements to this eProcurement functionality, focusing on the College's higher spend categories and Forced and Child Labour high-risk categories.

Local Buying

The Province of Ontario has recently enacted the [Building Ontario Business Initiatives Act](#), effective April 1, 2024, which will further prioritize Fanshawe's spending with Ontario-based businesses.

Ontario Colleges Purchasing Management Association (OCPMA)

The Ontario Colleges Purchasing Managers Association (OCPMA) is a collaborative organization dedicated to the sharing of best practices, policies, and procedures among Ontario colleges. OCPMA is currently working closely with [Reeve Consulting](#) to establish and meet sustainability goals, including ethical purchasing practices. This collaboration ensures that the supply chains of member institutions, such as Fanshawe College, are establishing supply chain activity that are free from forced or child labour.

Fanshawe College actively shares information and knowledge with other institutions through the Ontario Colleges Purchasing Managers Association (OCPMA) during regular business meetings. This collaborative communication helps identify supply chain, supplier, and geographic concerns related to forced and child labour. By working together, the colleges ensure that their supply chains adhere to the highest standards of ethical procurement, helping to reinforce Fanshawe's commitment to sustainability and social responsibility.

Supplier Code of Conduct (SCoC)

Fanshawe College is dedicated to maintaining ethical, legal, and socially responsible sourcing practices and expects the same commitment from its suppliers. The college is nearing the completion of its Supplier Code of Conduct (SCoC), which will establish the fundamental ethical standards and business practices required of all suppliers providing goods or services to the institution.

The SCoC has been developed drawing insights from the Canadian Government and cross-industry best practices. The standards set out in the SCoC address issues such as forced and child labour, fair treatment of employees, wages and benefits, worker health and safety, etc., that align with the International Labor Organization (ILO) and other applicable regulations such as the Act.

Fanshawe College employs a collaborative strategy in the development of its Supplier Code of Conduct (SCoC), engaging key suppliers to foster understanding and ensure genuine commitment. This approach emphasizes that compliance with the SCoC extends beyond mere formality, underlining it as a mutual responsibility. The SCoC is vital in aligning Fanshawe and its suppliers on regulatory compliance, risk management, and maintaining a reputable standing. Consequently, Fanshawe expects suppliers to formally acknowledge their adherence to the SCoC, underscoring its importance in the procurement process.

The SCoC is to be issued to vendors who are entering into an agreement or contract with Fanshawe, have a significant spend, or are deemed to fall into a high-risk category, commodity, or geographical location.

By the autumn of 2024, all new vendors to Fanshawe College are expected to have received a copy of the Supplier Code of Conduct (SCoC) and will be required to sign an attestation confirming their understanding of its terms and conditions. Additionally, the SCoC has been incorporated into the college's procurement procedures by including it in the Terms and Conditions of Purchase Orders.

Should a potential breach of the SCoC be reported, the Contract Management Office at Fanshawe will undertake appropriate due diligence into the alleged non-compliance. If a supplier is found to be non-compliant with the SCoC, they will receive a formal notice of non-compliance and will be required to implement corrective actions within thirty days of the notice. Fanshawe, at its sole discretion, reserves the right to terminate the agreement with any supplier that fails to comply with the SCoC.

Request for Proposal/Quote Processes

Supply chains and procurement hold significant potential for both positive and negative sustainability impacts. It is essential to emphasize the collective responsibility of every purchase, regardless of its scale.

To facilitate this impact and empower the Fanshawe community, a Request for Quotation (RFQ) template document was created that incorporates a mandatory evaluation criteria rating for Environmental, Social, and Governance (ESGs). This template helps to streamline the process of identifying and integrating ESG considerations into purchasing decisions even when the process is not facilitated by Fanshawe's Contract Management Office (CMO).

When facilitating higher value Request for Proposals (RFPs) on behalf of the College, the Contract Management Office helps to identify where there may be a high risk for ethical supply chain practices, based on the product category or commodity, and provides suggested questions to assess and evaluate in an RFP. This may include requesting information on systems, policies, practices, or codes of conduct to monitor compliance with human rights standards within their supply chain and/or operations.

New Enterprise Resource Planning (ERP) System

Fanshawe College is in the process of deploying a new Enterprise Resource Planning (ERP) system, Workday, which is set to enhance the digital capabilities of its Human Resources, Finance, and Student systems. This initiative is part of the college's broader strategy to align with its digital and data strategies, aiming to create a seamless and user-friendly experience across various operational facets. The multi-year ERP implementation underscores Fanshawe's dedication to elevating its technological infrastructure and operational efficacy.

A key component of this ERP, the Workday Procurement module, is designed to optimize the procurement of goods and services by integrating user profiles, business process controls, and comprehensive analytics into a unified system. This integration not only streamlines the entire indirect procurement process but also establishes consistency and provides real-time visibility into organizational spending trends.

With the implementation of Workday, there is an anticipated enhancement in the reporting capabilities concerning the college's procurement activities. This advancement will facilitate more detailed monitoring of supply chains, particularly those categorized as high-risk in terms of geography, commodity, or other sensitive criteria, thereby improving the identification and mitigation of risks associated with unethical labour practices, including child and forced labour.

Moreover, the Workday Procurement module will enable the use of 'punch-out catalogs' from a vetted list of preferred suppliers who meet Fanshawe's stringent ethical supply chain criteria. This approach

strives to enhance compliance with ethical standards but also promotes the engagement of local suppliers within the province, significantly diminishing the likelihood of child and forced labour in the supply chain.

Potential Risks in Our Supply Chains and Operations

The College considers that its operational forced and child labour risk to be extremely low. Out of 160 countries, Canada is ranked 17th lowest in terms of prevalence of Modern Slavery by the Global Slavery Index produced by Walk Free, an international human rights group focused on the eradication of modern slavery. Coupled with low jurisdictional risk, our employees consist of professionals, unionized employees and contract employees, all of which are subject to Canadian labour and employment standards.

However, we understand that our supply chains are part of broader, global supply chains. While Fanshawe College is not aware of any Modern Slavery in its supply chains, the College recognizes that Modern Slavery can occur in every industry, sector and geographic location. As such, there are certain potential risks of Modern Slavery occurring in the College's supply chain. Despite the majority of the Company's consumables originating from lower-risk regions such as Canada, the following procurement categories have been identified as higher-risk categories within our supply chains by the [US Department of Labor report: 2022 List of Goods Produced by Child Labor or Forced Labor](#):

- Electronics – approximate annual spend of \$3.56M
- Apparel – approximate annual spend of \$324k
- Promo products – approximate annual spend of \$338k
- Office furniture – approximate annual spend of \$2.41M
- Printing & Office supplies (includes paper) – approximate annual spend of \$752k
- Course materials (non-digital or paper based) – approximate annual spend of \$15k

It is encouraging to note that approximately 36% of the total spend in the above identified 'higher-risk' categories is managed through Ontario Education Collaborative Marketplace (OECM) contracts. The numerous established practices by OECM, as detailed in the above section, significantly reduce the risk of forced or child labour within the supply chain. Accordingly, the College views the risk of child and forced labour in its supply chains to be low on an overall assessment with the understanding that there are specific areas that carry an increased risk.

Fanshawe College is not aware of any instances of Modern Slavery in its supply chains or operations and, therefore, has taken no remediation steps, including those that relate to the remediation of the economic impacts of remediation efforts.

Training and Education

As an educational institution, Fanshawe College acknowledges its duty to increase awareness about modern slavery and to educate on associated risks and best practices. The college is integrating ethical supply chain management into its internal employee 'onboarding' training. This training includes a concise overview of the procurement process, emphasizing the importance of engaging with vendors

who uphold responsible labour practices and comply with Fanshawe's Supplier Code of Conduct (SCoC), where practical and applicable.

Monitoring Effectiveness

At present, we intend to continue to re-evaluate the need to implement measures to assess the effectiveness of the processes we have in place based on the evaluation of our risks as described in this Report.

Attestation for Fanshawe College

In accordance with the requirements of the *Canada's Fighting Against Forced Labour and Child Labour in Supply Chains 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.

A handwritten signature in black ink that reads "Jenny Ruz". The signature is written in a cursive, flowing style.

Jenny Ruz, Vice-President, Finance and Administration, May 30, 2024.
I have the authority to bind Fanshawe College.