Bill S-211 Fighting Against Forced Labour and Child Labour in Supply Chains



Laurentian University's 2024 Annual Report On Fighting Against Forced Labour and Child Labour in Supply Chains

Reporting entity's legal name: Laurentian University

Financial reporting year: May 1, 2023 to April 30, 2024

Identification of a revised report: N/A

Business number(s): 119009686RT0001

Identification of a joint report: N/A

Identification of reporting obligations in other jurisdictions: N/A

Entity categorization according to the Act: Entity (University)

Sector/industry: Public Sector / Higher Education

Location: Sudbury, Ontario, Canada

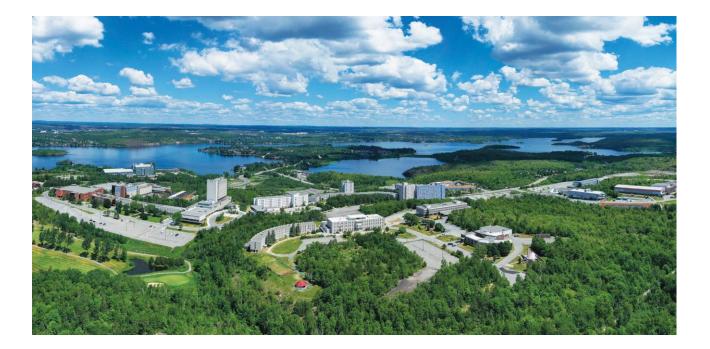
Introduction and Land Acknowledgement

We would like to acknowledge the Robinson-Huron Treaty of 1850. We also further recognize that Laurentian University is located on the traditional lands of the Atikameksheng Anishnawbek and that the City of Greater Sudbury, also includes the traditional lands of the Wahnapitae First Nation. We extend our deepest respect to Indigenous peoples - as a sign of our continued

relationship we will support Laurentian University's Truth and Reconciliation Task Force Recommendations.

Miigwech.

Ka ke ginwaamdanaa Aki Gaabijidebendaagwak Robinson Huron Naakinegewin ode 1850. Miinwa ginwaamdandaa Laurentian Chi-kinomaagegamik gewii teg maanpii gidaa kiimina Atikameksheng Anishinaabek debendaagwak miinwa Chi-odeno Sudbury miinwa gewii debendaagwak Wahnapitae Anishinaabe kiing. Gichipiitenmananig Anishinaabek- ga nakiitaanaa weweni maanpii Laurentian Chikinomaagegamik Debwewin miinwa Minadaapnagewin Nakii Naadmageh Makwataagziiwin. Miigwech.



About Laurentian University

Laurentian was incorporated on March 28, 1960, pursuant to An Act to Incorporate Laurentian University of Sudbury, S.O. 1960, c. 151 C. 154.

For over 60 years, Laurentian University of Sudbury ("Laurentian") has operated as a publicly funded, bilingual and tricultural post-secondary institution in Northern Ontario, providing high-quality, postsecondary education to domestic and international undergraduate and graduate students.

The bilingual and tricultural nature of Laurentian is unique in Ontario and its impact on outcomes in the region is vital and crucial. Laurentian is an important source of learning to Northern Ontario and the thousands of students who otherwise would have difficulty accessing post-secondary education.

Laurentian University's Strategic Plan 2024-2029 is a Plan for Connection, Innovation and Impact and is guided by the following values:

- Community;
- Integrity;
- Student Success;
- Stewardship; and
- Collaboration



As part of Laurentian University's Institutional Strategic Plan, the University's mission works to prepare the leaders and changemakers of tomorrow in a bilingual and tricultural environment that nurtures creativity and broadens understanding. It is driven to continuously generate, explore and refine ideas that contribute to the wealth of human knowledge that will shape a more prosperous, equitable and sustainable world. As stewards of public and private resources, the University accepts accountability for our performance and aims to ensure we evaluate the impact of our actions on our human, financial and environmental resources to ensure that the outcomes will be sustainable and form a solid academic foundation for our future scholarly endeavors.

In this report, we outline information as required under section 11(1) and 11(3) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act. More specifically, we describe the steps Laurentian has taken during the previous financial year 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 by the entity or of goods imported into Canada by Laurentian.

Reporting Entity and Structure

Laurentian University was incorporated in 1960 through The Laurentian University Act. The University is led by a bicameral system of governance consisting of two governing bodies, the Board of Governors and the Senate. The Board of Governors is responsible for the governance, conduct, management and control of the University and of its property, revenues, expenditures, business and affairs. The Senate is responsible for the educational policy of the University and, with the approval of the Board in so far as expenditure of funds is concerned, may enact bylaws and regulations for the conduct of its affairs.

Laurentian has a well-defined organizational structure that supports its academic and administrative functions. There are approximately 1,000 full and part-time employees working at Laurentian. All employees work in Canada and are subject to Canadian labour laws.

Activities and Supply Chain

Laurentian's core business activities revolve around provision of educational services, advancing research and development initiatives, and community engagement. As a component of these activities, Laurentian offers an array of textbooks and course materials, electronics, office supplies, as well as a selection of promotional merchandise and apparel.

Business activities related the importation of goods:

Laurentian purchases and in some cases, imports goods to support the administration of academic and student services, research and development, marketing and communications and facilities management. Related supply chain activities include:

- Acquisition of goods and services needed for University operations (information technology, office supplies, lab equipment, facilities management)
- Campus store sale of goods in Canada, a small proportion of which are imported (apparel, electronics, office supplies and promotional products)
- Athletics (apparel, equipment, and supplies for sports teams)
- Student Supplies (lab supplies, classroom supplies, art supplies)
- Acquisition of goods for research (lab supplies, chemicals, and equipment)
- Residences providing accommodation to students
- On campus food services

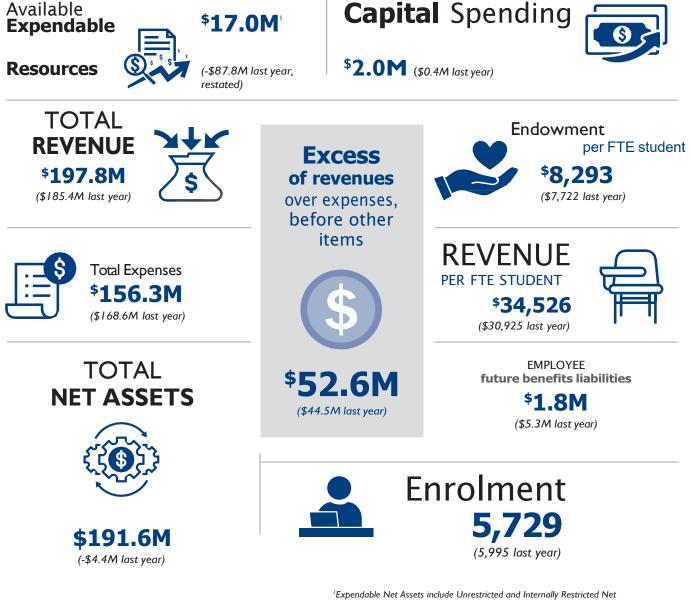
Laurentian University's total importing value for fiscal reporting year January 1, 2023, to April 30, 2024, was approximately \$730,800 and 14.79% of the imports were of Canadian origin.

Direct imports into Canada

Laurentian's categories of direct importations in the previous fiscal year were:

- Books/Textbooks
- Research Supplies
 - Lab supplies, reagents, and chemicals
- Apparel and promotional materials
- Scientific equipment
- Office supplies
- Electronic equipment

LAURENTIAN BY THE NUMBERS 2022-2023



'Expendable Net Assets include Unrestricted and Internally Restricted Net Assets (as outlined in the University's audited financial statements).

Per Audited Financial Statements 2022-2023

Policies and Due Diligence

The University has adopted policies and responsible business conduct due diligence practices which govern our activities and aim to reduce the risk of modern slavery in our operations and supply chain. These include:

- Ontario Broader Public Sector Procurement Directive
- Policy on Purchasing
- Supply Chain Code of Ethics
- Respectful Workplace and Learning Environment
- Sustainability
- Accessibility
- Decision-Making Requirements Associated with Current and Future Capital Projects

Ontario Broader Public Sector Procurement Directive

As an organization that is governed by the Ontario Broader Public Sector Procurement Directive, Laurentian University engages in ethical, fair, and transparent procurement practices which align with the Supply Chain Code of Ethics contained within the Directive. We continuously work with our supply chain partners to improve purchasing practices and to ensure the best value for money.

In support of this Directive, the University seeks out opportunities from collaborative purchasing groups whenever feasible. This includes partnering with the Ontario Education Collaborative Marketplace (OECM), initially established by the provincial government to promote collaboration, as well as participating in collaborative Vendor of Record (VOR) arrangements offered by Supply Ontario. The University is working with OECM to verify that awarded suppliers have furnished an attestation of compliance with ethical principles and employment standards, ensuring goods and services are free from forced or child labor, aligning with International Labour Organization practices.

The Directive also outlines requirements under the Building Ontario Business Initiatives Act (BOBIA) established by the Ontario government, as of April 1, 2024, that requires the University to give preference to Ontario businesses for the procurement of all goods and services, wherever feasible. In compliance with this Directive, Laurentian has implemented new procedures to ensure compliance and allow for trackable KPI's.

Policy on Purchasing

Laurentian University is committed to maintaining high standards for performance based on fair, ethical, legal, environmental, and professional business practices. The University, its Employees and agents shall procure goods and services in an open, fair and transparent manner and in a competitive environment, so that all transactions yield the optimal benefit to the University in the circumstances.

• Sustainability

Laurentian University Procurement Services, where practical, will take social and environmental factors into consideration alongside financial factors in making decisions on the purchase of goods and services.

Laurentian University is committed to fostering a strong culture of sustainability. In 2009, our President and Vice-Chancellor signed the Council of Ontario Universities pledge, <u>Ontario</u> <u>Universities: Committed to a Greener World</u>. By signing this pledge Laurentian University accepted responsibility to: "to assist in finding solutions to the challenges of environmental sustainability; to share knowledge about sustainability and climate change; and to incorporate, wherever possible, principles of sustainability into our own operations".

Sustainable initiatives at Laurentian University are driven and achieved by faculty, student and staff engagement and collaboration. Our mission is to promote environmental stewardship for the campus community in the hopes of continuously building a sustainable future to learn, work, live and play.

Accessibility

Laurentian University is committed to creating a campus community that is safe and inclusive for all individuals. Successful learning, living, and employment outcomes are the result of a shared responsibility and commitment on the part of students, employees, faculty, and senior administrators. As Laurentian continues to enhance its culture of inclusiveness, it will require the recognition and support of everyone on campus to ensure the removal of barriers to accessibility.

• Supply Chain Code of Ethics

Laurentian University is committed to acting in an ethical, legally compliant, and socially responsible manner and requires our staff to adhere to similar standards. We have a clear code of behavior for day-to-day activity undertaken on behalf of the University via the Respectful Workplace and Learning Environment Policy however, The Supplier Chain Code of Ethics sets out the minimum ethical standards and business conduct for staff, students or any individuals that procure goods or services on behalf of the University. Laurentian University Supply Chain Code of Ethics is integral to the University Policy on Purchasing, and the University's supply chain practices are guided by this Code of Ethics. The purpose of the Code of Ethics is to ensure an ethical, professional and accountable University supply chain, consistent with that of the Broader Public Sector (BPS).

• Request for Proposal, Tender Documents and Contractual measures Laurentian includes language in support of the policies and procedures outlined above relating to University Policies and Procedures and its expectations in supplier contracts.

Future Initiatives

Laurentian endeavors to review existing policies and procedures and is in the process of developing an action plan to improve our due diligence efforts. We plan to further evaluate risks in our supply chain, incorporate the policies and due diligence strategies into procurement of all high-risk categories, and provide communication and training throughout the institution.

Supply Chain Risks

Laurentian assessed the parts of its business and supply chains that carry a risk of forced labour or child labour using: (1) Canadian Collaboration of Sustainable Procurement (CCSP) guidance; and (2) the US Department of Labor's "<u>List of Goods Produced by Child Labor or Forced Labor</u>" (see page 38 of the 2022 list).

High Risk Categories	Sub-categories
Electronics Appliances	Computers, laptops, cellphones, TV's, printers Refrigerators, microwaves, dishwasher, etc.
Apparel / Garments	Uniforms, promotional apparel
Safety Gear	Work boots, hard hats
Promotional Products	Water bottles, mugs, gifts/trinkets
Office Furniture	Desks, chairs, shelves, etc.
Vehicles and Motorized Equipment	Fleet, vehicle components, forklifts, construction machinery, grounds equipment, etc.
Office Supplies (Paper)	Paper
Food & Beverage	Coffee, tea, other
Building's Internal Furnishings	Flooring, fixtures, textiles, Bricks, Copper, Glass, Minerals, Polysilicon/Solar Panels, Precursors (sodium carbonate, calcium carbonate), Rubber, Steel/Iron, Stone, Textiles,
Construction Materials	Timber

With respect to (1), CCSP has conducted an assessment to identify categories and subcategories in the public sector supply chain that are at high risk of forced and child labour. Based on these categories, Laurentian has completed a high-level assessment of related institutional spend and recognizes that supply chain risks may exist in activities surrounding the purchase of apparel/garments, promotional products, electronics, food and beverage and paper.

While each of these commodities represent a very low value in proportion to the overall total spend, the University recognizes there are risks in these areas.

Laurentian Activities

Laurentian does not manufacture or produce our own goods for sale/resale.

Imported Goods

Laurentian has assessed all direct import transactions in the past year to determine if any of the categories identified are being imported from countries at high-risk of child/forced labour. The following imported goods that carry a risk of child labour or forced labour:

- imported apparel/garments originated from high-risk countries
- imported promotional products originated from high-risk countries
- imported electronics originated from high-risk countries

Activities of Direct and Indirect Suppliers

Laurentian has identified potential risks of child labour or forced labour through the activities of our direct and indirect suppliers in the following areas:

• Apparel and Promotional Items:

The University purchases apparel, promotional products for resale and a low percentage of these goods were imported directly from other countries in the past year. While most of these purchases are from Canadian suppliers, we recognize that there is a risk of forced labour or child labour in the supply chains of our direct suppliers.

• Athletics Apparel:

The University purchases garments and apparel for use in the following areas:

- Sports Team Apparel and Uniforms
- Camp T-shirts
- Uniforms
- Safety Garments and Footware
- Other

• Food Services:

Laurentian has an agreement with one food service provider who supplies all food, beverage and labour for the University. A portion of this spend that includes the acquisition of food and beverage products could carry risk of forced or child labour.

• Other Direct Suppliers:

While a high percentage of goods are purchased directly from Canadian suppliers, University purchases could potentially carry a risk of forced or child labour through their indirect suppliers in the following categories:

- Electronics
- Purchases of Office Furniture, Promotional Products, Paper, Vehicles, Food and Beverage goods and services.

Measures taken to manage risks

• Food Services:

Language is embedded in our RFP documents for Food Services requires compliance with our policies and procedures including the Respectful Workplace and Learning Environment.

Our Food Service Provider is required to adhere to international and local labour standards. The service provider also requires the suppliers within their supply chain to comply with all applicable laws, and, in addition, have multiple policies and processes that expectations regarding human rights and labor rights and provide a Risk Assessment Plan. Their suppliers must adhere to codes and policies which specifically addresses forced labour and child labour. Other third-party service providers, such as Tim Hortons also have certifications in place as further outlined below.

 Tim Hortons: Utilizes The Enveritas Certification. The Enveritas Certification is a verification process that evaluates a wide range of social, environmental, and economic criteria, grounded in international protocols and conventions such as the International Labour Organization Conventions on Child Labor, Forced Labor, and Trafficking; the United Nations Conventions.

• Sports Team Apparel:

Language is embedded in our RFP documents for sports team apparel to ensure garment manufacturers provide a detailed history of any violations by their company; related to fair trade purchasing of or ethical apparel manufacturing during the five (5) year period immediately prior to the published date of the RFP. Our current apparel contract for the purchase of athletic team apparel ensures that our supplier adheres to this requirement. Our supplier has provided a detailed history that outlines the expectations and minimum employment standards requested in the RFP.

Ongoing and Future Measures

We will continue to primarily engage Ontario-based suppliers to ensure compliant labour sources. By advocating for the use Ontario suppliers with our University, we aim to minimize the risk of outsourcing good and services to a foreign suppliers that might use child or forced labour sources in their direct or indirect resources.

Laurentian is exploring other measures to assess and manage associated risks, such as implementing a Supplier Code of Conduct, as well as working towards integrating ethical questions and expectations into RFPs for the high-risk categories in areas not currently addressed and are relevant to our institution.

Remediation Efforts

No measures have been taken in this area.

Education and Training

Procurement training at Laurentian is an ongoing activity. Procurement staff have been educated on Bill S-211 and will be given additional professional training. Laurentian may also in develop ethical procurement training modules including forced labour and child labour that will be made available to Faculty and Staff.

Performance Measurement

Laurentian is currently reviewing and consulting on procedures to evaluate the efficacy of its efforts in preventing and mitigating the risks of forced labor and child labor across all its business operations and supply chains.

Relevant Key Performance Indicators are assessed annually to help safeguard against forced labour and child labour:

- % of local sourcing by Food Service Provider*
- Fair Trade Compliance by Food Service Provider*
- % of spend with Canadian suppliers
- % of spend of direct imports originating from high-risk countries

* Failure to meet the required KPI measurements results in a financial penalty to the supplier

Approval and Attestation

This report has been approved by the Laurentian University Board of Governors in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Signed:

Name:

Title: Chair, Laurentian University Board of Governors

May 30, 2024

Date:

I/We have authority to sign on behalf of Laurentian University

Laurentian University has been a source of pride for Greater Sudbury and Northern Ontario since its founding. For more than 60 years, Laurentian has been a vital partner in the success of thousands of individual students, faculty, and staff, and the local and regional communities for which it was established. Laurentian has always been at its best when it has understood how interconnected it is with the communities that it serves and harnessed the resilience, creativity and diverse knowledge of its people to create and deliver excellent education and innovative research for the benefit of these communities.

