

2024 Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Introduction

This report has been prepared by St. George's School in response to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act) for our financial year ending June 30, 2023.

St. George's School is committed to promoting labour practices that protect the human rights of workers in our supply chains, including preventing and mitigating the risks of forced labour and child labour.

Organizational structure, activities, and supply chain

St. George's School is a leading independent day and boarding school for boys in British Columbia, Canada. We are located in Vancouver, on the territory of the Musqueam First Nation. Founded in 1930, we are an active member in local, national and international associations of educational institutions, including Independent Schools Association of British Columbia, National Association of Independent Schools, Canadian Accredited Independent Schools, The Association of Boarding Schools, and International Boys' Schools Association.

St. George's School provides educational services for boys from Kindergarten to Grade 12. Our Junior School offers tailored programs to students at Kindergarten, Primary Grade (Grade 1-3) and Intermediate Grade (Grade 4-7), respectively. Our Senior School offers academic programs that enable students to discover and develop their unique strengths, talents, and passions. We are committed to authentic learning and character development to fulfill our mission *To Build Fine Young Men. One Boy at a Time.*

St. George's School procures a range of products to support our educational programs, including classroom and office furniture, technology items, department equipment, printed materials, clothing, giftware and textiles. Through our St. George's School Retail Store, we sell and distribute branded items to our faculty, students and their families, including school uniforms, athletic uniforms and equipment, school bags, clothing and giftware.

In our financial year ending June 30, 2023, more than 90 percent of procurement spending was with local suppliers. We occasionally import products from outside of Canada to support our education activities. In our financial year ending June 30, 2023, the value for the imported items was under \$50,000 and was less than 10 percent of our total procurement spending.

Steps to prevent and reduce the risks of forced labour and child labour

In our financial year ending June 30, 2023, St. George's School has taken the following steps to prevent and reduce the risks of forced labour or child labour in our supply chain:

- Adopting a Retail Purchasing Policy to set environmental and social responsibility standards for the procurement of goods sold in St. George's School Retail Store.
- Adopting a Code of Conduct for Suppliers prohibiting the use of forced labour and child labour, which the suppliers of our branded garments, textiles and giftware are required to sign.

- Requesting audits or certifications from suppliers to assess compliance with our Code of Conduct for Suppliers and purchasing policies.

Policies and due diligence processes

Our **Strategic Plan 2023-2033** confirms St. George's School's core values, which include empathy, humility, integrity, respect, responsibility and resilience. The Plan advocates a unique learning pathway that aligns the education with physical, mental and emotional health and identity, a community-centered partnership that is based on shared principles and goals to deepen community connections, a global steward that commits to campus sustainability in all aspects of school life, and a prioritization in providing resources to support all employees to contribute to the life of the school.

To align with our Strategic Plan, our **Code of Conduct for Faculty and Staff** affirms our commitment to safe working conditions at our campuses, by setting an expectation that all faculty and staff have the right to work in an environment that aligns with our core values. The Code of Conduct expects our Head of School, members of the Senior Administrative team, faculty, staff and suppliers to uphold high moral and ethical principles and specifies the basic norms of behavior for those who conduct education activities or procure products on our behalf.

St. George's School has established a **Retail Purchasing Policy** that sets out the standards that we expect our suppliers to comply with when producing and supplying services and products to St. George's School Retail Store. Our expectations include business integrity, safe working conditions and fair wages, and prohibits the use of forced labour, child labour. This policy confirms our long-term commitment to environment and social responsibility. It requires that the goods we purchase are aligned with our goals to improve social and environmental standards and that all suppliers are committed to ensuring that the workers who make our products are fairly treated in a safe and healthy workplace. Any violation of our expectations could lead to the termination of the business relationship between St. George's School and the supplier.

We have also established a **Socially Ethical Code of Conduct for Suppliers** that suppliers of our branded garments, textiles and giftware are required to sign as a condition of doing business with St. George's School. The Supplier Code of Conduct sets out minimum standards for worker rights and environmental responsibility, and specifically prohibits the use of forced labour and child labour in the production of goods. St. George's School reserves the right to monitor compliance and may request full and open access to facilities where our products are made.

St. George's School's Senior Administration team is accountable for implementing these policies. Our Department of Human Resources and Head of School are responsible for managing risks associated with human rights. The Director of Human Resources meets regularly with our Senior Administrative team and the Health and Safety Committee to consider any risks to workers that are associated with our education activities. Our Head of Retail Services, who reports to our Director of Operations, is responsible for implementing our Retail Purchasing Policy and Supplier Code of Conduct.

Forced labour and child labour risk

St. George's School operates exclusively in Canada and conducts business with long-term reputable suppliers and contractors. Most of the goods we procure are from Canadian suppliers. We refuse to conduct

business with suppliers when there is publicly available information indicating that such suppliers have not respected human rights in their activities and supply chain.

For these reasons, we have identified the risk of forced labour and child labour in our activities and supply chains to be low. However, we recognize that there are risks of forced labour and child labour in the global supply chain, and in particular, in the apparel and textile industries. We are committed to conducting ongoing reviews of our procurement activities and suppliers to uphold our commitments to respect the human rights of workers in our supply chains.

Remediation measures and remediation of loss of income

To date, St. George's School has not received any complaints relating to forced labour or child labour in our operations or supply chain, and as such has not taken any remediation measures or remediation of loss of income to families as a result of forced labour or child labour.

Employee training

Given that their primary role is to focus on the education of our students, St. George's School faculty and staff does not receive training that specifically relates to the risks and indicators of forced labour or child labour in our supply chains. Maintaining current knowledge on supply chain risks is a key job responsibility and accountability of our Head of Retail Services.

Assessing effectiveness

St. George's School monitors compliance of our suppliers with the standards set out in our Code of Conduct, Supplier Code of Conduct and Retail Purchasing Policy. We have adopted internal audit mechanisms to assess our direct suppliers and certain indirect suppliers as a way to monitor and track the effectiveness of our approach to preventing and reducing the risks of forced labour or 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 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.

Dated in the City of Vancouver, British Columbia, this 28 day of May, 2024.



Shanni Eckford, Board Chair

I have the authority to bind St. George's School.