

# Fighting Against Forced Labour and Child Labour in Supply Chains Act: 2023 Annual Report

## 1. Introduction

This report (the “Report”) is made pursuant to *sections 9 and 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for the fiscal year starting July 1, 2022, and ending June 30, 2023.

## 2. Structure, Activities and Supply Chains

Bow Valley College (the “College”) is a corporation known as “The Board of Governors of Bow Valley College” per *section 43 of the Post-Secondary Learning Act, Alberta*. It is a publicly funded comprehensive community college with campuses in Calgary, Airdrie, Okotoks, Banff and Cochrane. It has more than 15, 000 full-time and part-time students and employs over 752 salaried employees, including those providing teaching, administrative and professional services.

As a post-secondary institution, our principal supply needs include academic resources, health-related supplies, technology supplies and office supplies. A central purchasing team (the “Purchasing Team”) supports the entire College and ensures that our procurement activities comply with our policies and procedures and applicable procurement laws and regulations. Although some non-tangible purchases are made outside of our procurement processes, we are committed to sourcing goods and services locally, so our employees are encouraged to make these purchases, whenever possible, from companies located in Canada. First and foremost we follow the Canadian Free Trade Agreement and New West Partnership Trade Agreement.

## 3. Policies and Due Diligence Processes Concerning Forced Labour and Child Labour

The College prioritizes purchasing goods and services from reputable Canadian suppliers. Since 2018, the College’s Campus Services team has led a sustainable purchasing program with a vision that every purchase made by the College shall contribute to a supply chain that promotes positive environmental, social, and economic health.

For all procurements over \$75,000, the College conducts a due diligence process, including assessing the supplier’s social, economic, and environmental impacts. The College’s [Purchasing Policy](#), in particular, our Sustainable Procurement Procedure, outlines our approach to ethical procurement, including goods produced ethically and under fair working conditions. Our Sustainability Office reviews and scores all competitive bids with a minimum weighted sustainability score of 5%. A sustainability questionnaire is drafted for the unique

context of each competitive bid, and the sustainability weighting increases for goods with a reputation for forced labour and child labour (such as textiles).

We also have a [Supplier Code of Conduct](#) (the “Supplier Code”), which the College requires all suppliers to review and agree to. The Supplier Code, for example, states that our suppliers and their subcontractors shall be guided by the International Labour Organization’s (“ILO”) labour standards and that they shall not use child or forced labour. Our contracts also include clauses requiring suppliers to comply with all applicable laws and operate in a socially, economically and environmentally responsible way.

#### **4. Parts of Our Business and Supply Chains that Carry a Risk of Forced Labour or Child Labour and Steps We have Taken to Assess and Manage That Risk**

We do not utilize forced or child labour in our operations. The College conducts a thorough pre-employment screening, including verifying the age and immigration status of all our employees. In addition, all our employees are hired and provided with remuneration, benefits and work conditions that comply with applicable laws and regulations.

We endeavour to work with and procure goods from companies that share our commitment to socially responsible business practices. No specific instances of the use of forced or child labour were identified this fiscal year. However, the following were identified as having a risk of forced or child labour being used in the supply chain:

- Purchase of electronics; and
- Purchases made outside our standard procurement processes, including online purchases and purchases made by our international recruitment agents.

The College intends to conduct a further review to analyze and mitigate the above-identified supply chain risks. We intend to also continue to develop and refine our processes for identifying and mitigating the risks of forced and child labour in our supply chain.

#### **5. Measures Taken to Remediate Any Forced Labour or Child Labour and Loss of Income**

No remediation measures were taken as we did not identify any specific instances of forced or child labour in our activities or supply chains.

#### **6. Training Provided to Employees on Forced Labour and Child Labour**

The College is an active member of the Association for the Advancement of Sustainability in Higher Education (“AASHE”). We are also a member of the Sustainable Purchasing Leadership Council (“SPLC”) and an active participant in the SPLC’s Higher Education Peer Learning Circle. Our SPLC membership allows us to stay current on best practices in sustainable

purchasing, and all College employees can access SPLC's resources using their Bow Valley College email addresses. However, no training was provided to employees on forced and child labour.

**7. Assessing The Effectiveness of Our Forced and Child Labour Prevention and Mitigation Measures**

As mentioned above, we do not utilize forced or child labour in our operations. Concerning prevention and mitigation measures in our supply chains, our Purchasing Team takes the lead in evaluating suppliers when we purchase goods over \$75,000. We include in our request for proposals a sustainability section, which is an opportunity for the College to assess a supplier's commitment to environmentally and socially responsible practices. Our Sustainability Office is typically part of our procurement vetting panel and is primarily responsible for reviewing a potential supplier's ethical and environmental practices.

Going forward, we intend to explore retaining a third-party verifier to assess the effectiveness of our forced and child labour prevention measures. We intend to also continue to have internal discussions on additional steps we can take to prevent and reduce the risk of forced or child labour in our supply chains.

**8. Approval and Attestation**

This Report was approved by the Board of Governors of Bow Valley College on May 29, 2024, in accordance with *section 11 (4) (a)* of the Act and signed on its behalf by:



Misheck Mwaba, P.Eng., Ph.D.  
President & CEO

Date: May 30, 2024