

## **Modern Slavery Report 2023-2024**

### **The Centennial College of Applied Arts and Technology**

*This Modern Slavery Report (the “**Report**”) addresses the period from April 1<sup>st</sup>, 2023 to March 31, 2024 and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “**Act**”). This Report is made on behalf of The Centennial College of Applied Arts and Technology, Suzhou Centennial College, Centennial Training International Pty Ltd., Centennial Training International Pte Ltd., Centennial College Vietnam Company Limited, Centennial College Far East Asia Office, Centennial College of Applied Arts and Technology – Liaison Office, Centennial Philippines Representative Office and Centennial LP (collectively “Centennial”, “the College”, “we” or “our”).*

#### **1. Introduction**

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. The College recognizes the important role that it has in ensuring that our operations and the supply chains that support them, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain.

This Report sets out the steps we have taken during fiscal year 2023-2024 to prevent and reduce the risk that forced labour or child labour is used within any part of the College’s business, supply chains or in goods imported into Canada by the College.

#### **2. Organizational Structure, Activities and Supply Chains**

Centennial was established in 1967 and is a college of applied arts and technology under the *Ontario Colleges of Applied Arts and Technology Act, 2002*. The College is an agency of the Crown and is a government not-for-profit organization that provides post-secondary, vocationally oriented education. We also undertake research and other related activities.

The College is organized into eight schools:

1. English and Liberal Studies;
2. Business;
3. Communications, Media, Arts and Design;
4. Community and Health Studies;
5. Engineering Technology and Applied Science;
6. Hospitality Tourism and Culinary Arts;
7. Transportation; and
8. Part-time Learning.

These eight schools are supported by six professional service groups.

Centennial is headquartered in Scarborough, Ontario. We have five campuses in the Greater Toronto Area and operate Suzhou Centennial College (“SCC”), which is the first Canadian college nationally approved to operate in China by the Chinese Ministry of Education, Jiangsu Provincial Government.

We have eleven satellite offices that primarily support student recruitment activities and which are located in China, India, Korea, Mauritius, Mexico, Panama, Philippines and Vietnam. We also have recruitment representatives in Indonesia and Nigeria.

Centennial’s supply chain consists primarily of businesses providing construction services and supplies, IT goods and services, laboratory equipment and supplies (e.g., small and large equipment, parts and other consumables), academic services (e.g., curriculum development, proctoring services etc.), food supplies, professional and consulting services, building services (e.g., cleaning, security etc.) and furniture.

We are a member of the Ontario Education Collaborative Marketplace (“OECM”), a not-for-profit collaborative sourcing partner for the education sector in Ontario and many of our purchases are made using OECM arrangements and/or through our membership in other group purchasing organizations. As a government not-for-profit organization, the College also has access to certain purchasing arrangements that have been negotiated and established by the Ontario provincial government.

In fiscal year 2023-2024, we procured goods and services from approximately 1,100 suppliers; 1,000 of these suppliers are located in Canada and just under 100 of them are located in the United States. Our satellite offices purchase office supplies, furniture and professional and facility management services from approximately 100 local vendors.

We also use the services of international student recruitment agents operating around the world. In fiscal year 2023-2024 approximately 85% of these services were conducted through roughly 800 student recruitment agencies located across Asia and Australia.

As part of our research and innovation activities, the College may also partner with organizations and suppliers on a number of projects. These organizations and businesses are primarily located in Canada.

The College had over 36,000 students enrolled in its programs during fiscal year 2023-2024 and has approximately 4,500 full-time and part-time employees working in Canada and 53 hired contract workers outside of Canada.

### **3. Our Policies**

Through our organizational and governance policies and procedures we communicate our values and expectations, setting a high bar for ourselves and our students and making it clear that we do not approve of human rights violations in any form including forced labour or child labour.

We are committed to conducting our operations in a transparent manner and strive to maintain high standards of integrity and accountability. Whether involved in teaching, research or the governance and administration of the College, all members of the Centennial community are expected to conduct themselves in an ethical manner and to comply with all the applicable laws of Canada and other countries in which they are working.

Our relevant policies and procedures are discussed in further detail below.

- Our Whistleblower Policy and Whistleblower Procedures provides all members of the College with a way to confidentially disclose perceived or suspected wrongdoing including wrongdoings related to forced labour or child labour.
- Our Research Ethics Policy governs any research activity that includes human subjects and outlines our commitment to ensure that participants in such activities are treated fairly, equitably and with respect and concern, including concern for their welfare.
- Our compensation procedures include the use of a job evaluation system and pay structure to ensure that our Canadian employees are paid fairly for the work they do. Our Canadian support staff and full-time teaching faculty are members of the Ontario Public Service Employees Union (“OPSEU”) and their employment is governed by the terms in their respective Collective Agreements. Employment terms for our Administrative employees are also set-out in a Terms and Conditions of Employment agreement.
- Students employed on campus are compensated based on an OPSEU Collective Agreement and unpaid student internships on campus are not permitted.
- Compensation for contract workers outside of Canada is established based on the standard wage policies of the respective country and individual capabilities and experience.

#### **4. Due Diligence**

We expect third parties we work with to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. We acknowledge that employees working for the businesses that supply us with goods and services are at potential risk of forced labour or child labour.

Many of our purchases are made through our OECM membership. The OECM suppliers we deal with are expected to comply with OECM’s Supplier Code of Conduct (the “Code of Conduct”) which requires them to abide by applicable labour and human rights legislation. The practices adopted by their suppliers must be verifiable and such verification may be conducted by way of supplier self-evaluation and/or audit by OECM at its discretion. Their suppliers may also be required to provide OECM with documents attesting to their compliance with the Code of Conduct and OECM may elect to visit the suppliers’ facilities.

In the next few years, we plan to require suppliers bidding on significant procurements (particularly procurements for higher risk goods and services) to attest to their compliance with

human rights, labour relations and workplace health and safety legislation and to describe the processes they have in place to prevent and/or detect forced and child labour in their own operations and/or their supply chain.

## **5. Assessing Our Risk**

In assessing the risk of forced labour and child labour in our own operations and in our supply chains, we considered the nature of our business activities, the workforce involved in those activities and the jurisdiction in which the activities take place.

We believe that the risk of forced and child labour occurring within our own operations is low. This conclusion is based on a number of factors including the fact that our workforce is comprised mainly of permanently employed and/or skilled workers that are governed by union-negotiated Collective Agreements and Canadian human rights, labour relations and workplace health and safety legislation. We comply with the requirements of our Collective Agreements and applicable legislation.

Our exposure to the risk of forced labour and child labour increases when we engage with third parties. This is particularly true for:

- Third parties engaged to provide building services (such as cleaning, security, food concession services, campus bookstore services, parking lot services) as these services may involve low skilled workers and/or may be subcontracted or further outsourced to other suppliers.
- Businesses that supply us with furniture, IT equipment or laboratory equipment and supplies that have been manufactured in certain jurisdictions where job competition may result in low wages and/or excessive overtime.

Our goal for the next few years is to manage these risks by requiring significant new building service providers and other suppliers to attest to their compliance with human rights legislation and to describe the processes they have in place to prevent and/or detect forced and child labour.

## **6. Our Commitments**

In fiscal year 2023-2024 we carried out the following actions to prevent and reduce the risks of forced and child labour:

- Canadian suppliers bidding on major building services provider contracts were required to agree to comply with legislation that provides certain termination and severance rights to employees who might otherwise be left without recourse when a building service provider changes.
- Suppliers bidding on construction projects with a budget of more than \$100,000 and certain other building service providers were required to provide evidence of their

“good standing” status with the Workplace Safety and Insurance Board (“WSIB”). WSIB provides wage-loss benefits, medical coverage and support to help employees get back to work after a work-related injury.

- Employees working in our procurement area received initial training on the requirements of the Act.

Our commitment and work to prevent and reduce the risk of forced and child labour will be ongoing. During fiscal year 2024-2025 we will aim to:

- Provide staff working within the procurement area with additional training to promote awareness of forced labour and child labour.
- Create guidance on forced and child labour for non-procurement staff involved in the purchasing of high-risk goods and services.
- Revise procurement documentation and processes to promote identifying and prohibiting the use of forced labour and/or child labour within our activities and supply chains.
- Update our standard supplier contract terms to include anti-forced labour and child labour contractual clauses.
- Develop a Supplier Code of Conduct that details the requirements and expectations we have for our suppliers.

Additionally, one of the priority actions of our 2022-2025 People Plan is to provide resources that educate and enable our people managers on their fiduciary and legislative obligations to address human rights and fair practices across the College. Material on forced labour and child labour will be included within these resources.

## **7. Our Progress and Effectiveness**

We regularly review concerns raised through our Whistleblower Policy and other informal mechanisms of employee feedback. To date no concerns or complaints have been identified and as such we have not taken any measures to remediate any forced or child labour or to remediate the loss of income to the most vulnerable families that results from any such measure. In the event that we discover any forced labour or child labour in our supply chains, the supplier will be notified of our findings and we may take appropriate remediation measures, including suspension or termination of our agreement with that supplier.

During the next fiscal year, the College will work to select certain key performance indicators with respect to human rights, including forced labour and child labour. Once these key performance indicators have been selected, they will be reviewed with our Executive Team on an annual basis.

## **8. Approval & Signature**

This Report was approved by Centennial’s Board of Governors in accordance with section 11(4)(a) of the Act on June 4, 2024 and has been submitted to the Minister of Public Safety and

Emergency Preparedness in Canada. This Report is also available on our website at <https://www.centennialcollege.ca/>.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for the Centennial. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



**Susan Caldwell**  
**Chair, Board of Governors**

**June 4, 2024**

I have the authority to bind **The Centennial College of Applied Arts and Technology**.