

Date: May 28, 2024

To: Digvir Jayas, President & Vice-Chancellor (*Ex-officio* Board of Governors Member)

Agenda Item	FORCED LABOUR IN SUPPLY CHAINS REPORT
Motion	<i>That the Board of Governors approve the 2024 Forced Labour in Supply Chains Report (Approved).</i>
Action Requested	Board Approval (Closed Session)
Board Committee	Finance Committee
Purpose	Effective January 1, 2024, government institutions (Federal Ministries, departments or Crown corporations) and Entities (corporation, trust, unincorporated organization, subject to minimum size thresholds) must, on or before May 31 of each year, submit a report to the Minister of Public Safety on several points related to forced labour in supply chain, with the goal of reducing the risk that forced labour or child labour is used at any step of the production of goods produced, purchased or distributed by the government institution.
Strategic Priority	Enhance the sustainability of the University (environmental, economic and social)
Risk Considerations	This report ensures that the University is compliant with applicable legislation.



Nancy Walker

Vice-President (Finance & Administration)

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Report Data

Identifying Information

1. **Entity Reporting:** Entity
2. **Entity Legal Name:** The Governors of the University of Lethbridge
3. **Financial Reporting Year:** April 1, 2023 – March 31, 2024
4. **Revised report:** No
5. **Business/Charity Number:** 119279248
6. **Is this a joint report?** No
7. **Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?** No
8. **Which of the following categorizations applies to the entity?**
 - Canadian business presence (select all that apply):
 - ✓ Has a place of business in Canada
 - ✓ Does business in Canada
 - ✓ Has assets in Canada
 - Entity Size Thresholds
 - ✓ At least \$20 million in assets for at least one of two recent financial years
 - ✓ At least \$40 million in revenue for at least one of two recent financial years
 - ✓ Employment of at least 150 employees for at least one of its two financial years
9. **Which of the following sectors or industries does the entity operate in?**
 - ✓ Educational services
10. **In which country is the entity headquartered or principally located?** Canada
11. N/A

ANNUAL REPORT (for entities)

1. **Steps the entity taken in 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 the entity? Select all that apply. (Required)**
 - ✓ Mapping activities

Mapping supply chains

 - ✓ Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

Developing and implementing an action plan for addressing forced labour and/or child labour

Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily

Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour

Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains

Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour

Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains

Developing and implementing child protection policies and processes

Developing and implementing anti-forced labour and/or -child labour contractual clauses

Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists

Auditing suppliers

Monitoring suppliers

Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour

Developing and implementing grievance mechanisms

Developing and implementing training and awareness materials on forced labour and/or child labour

Developing and implementing procedures to track performance in addressing forced labour and/or child labour

Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour

Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks

Information not available for this reporting period

Other, please specify:

2. **Please provide additional information describing the steps taken (if applicable) (1,500 character limit)**
3. **Entity's structure:** Registered Charity
4. **Entity's Activities**

- ✓ Importing goods into Canada produced outside of Canada, where importing does not include the purchase of goods from a third party considered to be the importer for the purposes of the Customs Act.
- ✓ Selling goods in Canada, where goods are subject to trade and commerce, except very minor dealings.

5. Additional Information on Entity's Structure, Activities and Supply Chains (1,500 character limit)

The University of Lethbridge is a public comprehensive and research University located in Southern Alberta, Canada. The University delivers post-secondary education services, research services and ancillary services as well as services to the broader Lethbridge community. The University is incorporated under the provincial Order in Council and is a registered charity. The University may import goods from outside of Canada to support activities carried out in the regular course of business. Selling of goods in Canada, where goods are subject to trade and commerce, is not a primary activity of the University. The university has custom-configured supply chain where the purchases of goods support University's primary activities (education and research) as well as day to day operations.

6. Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

- ✓ Yes

6.1. If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

Embedding responsible business conduct into policies and management systems

- ✓ Identifying and assessing adverse impacts in operations, supply chains and business relationships

Ceasing, preventing or mitigating adverse impacts

Tracking implementation and results

Communicating how impacts are addressed

Providing for or cooperating in remediation when appropriate

7. Additional Information on Entity's Policies and Due Diligence Related to Forced Labour

The University is compliant with Canadian law and international standards on protection of human rights. Consistent with the Convention on the Rights of the Child, the University of Lethbridge supports ratification and implementation of international standards that

- protect children from economic exploitation;
- from performing any work that is likely to be hazardous;
- or to interfere with the child's education;
- or to be harmful to the child's health or physical, mental, spiritual, moral or social development.

The University requires Supply Chain Management Professional (SCMP) for buyers. SCMP are responsible, under the professional Code of Ethics, to be cognizant of social rights extended to all people, including the conventions of the International Labour Organization with respect to Labour standards.

The University Code of Conduct includes provisions against unfair advantage through illegal conduct, abuse, or any other unfair dealing practice, with escalation mechanism outlined for concerns.

Safe Disclosure Policy

Supplier and Contractor Ethical Practices Policy

Procurement of Goods and Services Policy (Tendering evaluation)

8. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?

- ✓ Yes, we have started the process of identifying risks, but there are still gaps in our assessments.

8.1. If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.

The sector or industry it operates in

- ✓ The types of products it produces, purchases or distributes

The locations of its activities, operations or factories

- ✓ The types of products it sources

The raw materials or commodities used in its supply chains

- ✓ Tier one (direct) suppliers

Tier two suppliers

Tier three suppliers

Suppliers further down the supply chain than tier three

The use of outsourced, contracted or subcontracted labour

The use of migrant labour

The use of forced labour

The use of child labour

9. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries?

Agriculture, forestry, fishing and hunting

Mining, quarrying, and oil and gas extraction

Utilities

Construction

Manufacturing

- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- None of the above
- Other, please specify

10. Provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit)

The University did not identify significant purchases of supplies and materials from countries believed to be produced by child Labour or forced Labour using the information published by Bureau of International Labour Affairs <https://www.dol.gov/agencies/ilab/reports/child-Labour/list-of-goods>.

11. Any measures taken to remediate any forced labour or child labour in its activities and supply chains?

Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.

Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

- No, we have not taken any remediation measures.

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

11.1. If yes, which remediation measures has the entity taken? Select all that apply. (Required)

Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support

Compensation for victims of forced labour or child labour and/or their families

Actions to prevent forced labour or child labour and associated harms from reoccurring

Grievance mechanisms

Formal apologies

Other, please specify.

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit)

Through collegial governance process the University plans to identify additional disclosure and prevention measures, such as, but not limited to: employee and supplier attestations, legal contract templates and public procurement process changes to report on and mitigate potential purchases of materials and supplies where the supplier is believed to use child and forced Labour.

13. Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Required)

Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.

Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

No, we have not taken any remediation measures.

- ✓ Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable) (1,500 character limit).

Not applicable, per above.

15. Does the entity currently provide training to employees on forced labour and/or child labour? (Required)

- ✓ No
- Yes

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit)

n/a

17. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?

- ✓ No

Yes

18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).