

1 **PURPOSE**

This annual report for the April 1, 2023 – March 31, 2024 financial reporting year has been created by Lambton College of Applied Arts and Technology (the “College”) for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “Act”).

2 **OUR COMMITMENT**

The College is committed to preventing and reducing the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, including goods that the College imports into Canada.

3 **CATEGORIZATION, SECTOR, AND INDUSTRY**

Our Operations

The College is a public college of applied arts and technology. It has campuses across Sarnia, Mississauga, Toronto, and Ottawa. Lambton has more than 70 post-secondary programs and apprenticeships and also offers post-graduate, part-time and training programs. The College sells goods directly in Canada and imports goods into Canada that are produced outside of Canada. Additionally, the College sells goods through its on-campus and online bookstore that is run and operated by the College.

4 **STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS**

Our Supply Chain

The College is a publicly funded Crown agency that administers post-secondary and continuing education programs and apprenticeships. Pursuant to this, the College sources goods including but not limited to apparel and related products, classroom supplies, lab supplies and equipment for academic and research departments, furniture, and various office supplies from both domestic and global suppliers.

Steps Taken by the College in 2023

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, or of goods imported into Canada, the College undertook an internal

assessment of the risks of forced labour and/or child labour in its activities and supply chain. Specifically, the College and its leadership started the process of reviewing and evaluating its internal policies and procedures with respect to the issues of child labour and forced labour. The College also maintains related policies and due diligence processes that were in force throughout 2023 and are set out in more detail below.

5 POLICIES AND DUE DILIGENCE PROCESSES

The College's Policies and Processes

In 2023, the College maintained several policies and processes which affirm its commitment to abiding by applicable forced labour and child labour laws, including:

- a) The College's Recruitment & Selection Policy contains a robust hiring process that involves checking all candidate references using a reference check software. Additionally, certain jobs at the College require a formal criminal record check and/or a vulnerable sector check. The policy requires when completing a "Recommendation to Hire Form", three reference check forms and proof of verification of the applicants' educational qualifications must be provided to the Hiring Manager.
- b) The College also leverages the supplier network of a collaborative sourcing partner in the Ontario education and public sector. Suppliers within this network are subject to the sourcing partner's Code of Conduct, which requires supplier compliance with applicable domestic and foreign laws, including with respect to health and safety, labour and employment and human rights, and expressly requires suppliers to be able to demonstrate that their workplaces do not accept child labour; that employees are free to raise workplace concerns without fear of reprisal; and; apply employment standards that meet or exceed legal and regulatory requirements.
- c) The College's Human Resources department reserves the right under the Required Background Check Policy to run a background check and make it a condition of hire for new employees who are working in a vulnerable sector. The policy also gives the College the right to cease consideration of a candidate for a role if they do not provide a background check. Employees may also be required to attest to the fact that they have completed a background check with the College. In conjunction with the Recruitment and Selection Policy described above, this policy helps to verify and reduce the likelihood that workers employed in vulnerable sectors by the College are under Ontario's legal working age.
- d) The College's Purchasing Policy ensures that those with access to the College's funds to purchase goods and services must comply with various ethical standards with respect to the procurement process. For example, there must be compliance with the Broader Public Sector Procurement

Directive, which explicitly states that supply chain activities must be open and accountable. Purchases over a certain monetary threshold must also be approved by the College's Board of Governors, further promoting accountability, and allowing for a thorough review of purchases.

- e) The College's Supply Chain Code of Ethics emphasizes and requires due diligence, transparency, and accountability in its dealings with suppliers. This policy also puts an obligation on the supplier to comply with any and all applicable laws both in Canada and Ontario.
- f) Employees of the College are responsible for obtaining and maintaining an employee identification card that has the employees name and employee number on it. The College also reserves the right to check employee identification cards when acting in an official capacity. Additionally, the College maintains that it will only issue key cards to individuals who have legitimate and official requirements, with supervisor approval. This helps limit the potential of unidentified workers on campus who the College has not had an opportunity to vet.

6 FORCED LABOUR AND CHILD LABOUR RISKS

The College has not started the process of identifying risks of forced labour and child labour that may exist in its supply chain. It is aware that there may be higher risks associated with certain regions, goods and industries.

7 REMEDATION MEASURES

The College has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

8 REMEDICATION OF LOSS OF INCOME

The College has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains.

9 TRAINING PROVIDED TO EMPLOYEES

In 2023, the College did not provide training to its employees on forced labour or child labour. Moving forward, the College will be assessing what related training may be appropriate.

10 ASSESSING EFFECTIVENESS

As outlined above, the College’s hiring procedure, purchasing policy, supply chain code of ethics, and badge/employee card system do reduce the risk that child labour and/or forced labour is present in the College’s activities and supply chain. The College does not currently have specific policies and procedures in place to assess its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its supply chain. However, it will be considering what methods of assessment may be appropriate in the future.

11 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 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.

IN WITNESS WHEREOF the authorized signing officer(s) of Lambton College of Applied Arts and Technology have executed this report as of the effective date of the signatures set out below.

SIGNED)	
)	LAMBTON COLLEGE OF APPLIED ARTS AND TECHNOLOGY
)	
May 27, 2024)	Per: _____
_____)	Name: Tania Lee
Date)	Title: Chair, Lambton College Board of Governors
)	
)	I have authority to bind Lambton College of Applied Arts and Technology