

ANNUAL REPORT ON FORCED AND CHILD LABOUR IN SUPPLY CHAINS

This report is made pursuant to *Fighting Against Forced Labour and Child Labour in Supply Chains Act* S.C. 2023, c. 9 (the “**Act**”). The report outlines the approach and initiatives taken by Seneca College of Applied Arts and Technology (“**Seneca Polytechnic**” or “**Seneca**”) in the 2024 reporting year to identify and address the risks of forced labour and child labour in its business operations and supply chains in its previous financial reporting year.

OUR COMMITMENT

Seneca Polytechnic is committed to preventing and reducing the risk that forced labour or child labour is used in the production of goods that Seneca Polytechnic imports into Canada.

CATEGORIZATION, SECTOR, AND INDUSTRY

Seneca Polytechnic is an entity under the Act

Seneca Polytechnic is an educational institution with campuses across the Greater Toronto Area and Peterborough.

The Act applies to Seneca Polytechnic as, in at least one of its two most recent financial years, Seneca had:

- (1) at least \$20 million in assets for at least one of its two most recent financial years,
- (2) generated at least \$40 million in revenue for at least one of its two most recent financial years, and
- (3) employed an average of at least 250 employees.

Our operations

Seneca Polytechnic is an institution that delivers polytechnic education, which combines rigorous academics with practical training across a range of careers and professions. Seneca’s course offerings range from health care to technology, business to creative arts, and community services to arts and sciences. Seneca Polytechnic provides full-time or part-time, in-person or online classes to educate approximately 30,000 full-time and 70,000 part-time students.

STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Our Structure

Seneca Polytechnic is a corporation without share capital and is a registered charity in Canada that is funded in part by the Government of Ontario. Seneca is overseen by a Board of Governors (the “**Board**”), which is comprised of members from the community, appointed by the provincial government, elected employees of Seneca Polytechnic and a student representative elected by the student body. The Board is supported by Seneca’s administration.

Our Supply Chain

Seneca Polytechnic both purchases, sells, and directly imports goods as necessary. The majority of purchased products that are manufactured outside of Canada are procured through local Canadian resellers.

The goods directly imported by Seneca Polytechnic are specialized or scientific goods and/or equipment. Examples include aircraft, aircraft parts and engines, scientific equipment for health science labs, biological samples for the health science programs, and educational books from publishers. To procure these goods, Seneca leverages various group purchasing organizations and vendors of record. If a product is not available through vendors of record, a competitive search is conducted to procure the required items. In the previous fiscal year, suppliers of imported goods were primarily located in the United States. These suppliers additionally may have had their own supply chains in overseas locations including China, Taiwan, and European countries.

Finally, Seneca Polytechnic also sells certain goods at its campuses. These goods are primarily sold by third-party vendors on behalf of Seneca. The goods that are sold include, but are not limited to, apparel, textbooks and food.

Steps Taken by Seneca Polytechnic in Prior Financial Year

Seneca Polytechnic maintains general due diligence processes that promote responsible, ethical and legal business conduct, including with respect to labour practices. These processes are set out in more detail below and were in force throughout the previous financial year. Seneca Polytechnic is exploring what additional steps may be appropriate in the future.

POLICIES AND DUE DILIGENCE PROCESSES

Seneca Polytechnic has due diligence processes related to forced and/or child labour, including embedding responsible business conduct into its policies and management systems. These include:

- a) Seneca's Goods Purchase and Installation Agreement requires its suppliers to comply with all federal, provincial, and local laws in fulfilling their obligations under the agreement.
- b) Seneca's Request for Proposal process allows it to reject a proposal where there is evidence that the proponent has failed to comply with any law protecting individuals against any manner of discrimination, or if a proponent has conducted itself improperly.
- c) Seneca Polytechnic uses Standard Purchase Terms that require suppliers to warrant that they shall comply with all laws in all jurisdictions applicable to the delivery of the goods and/or the performance of services. In addition, when an agreement is subject to requirements of a trade agreement (including the Canada Free Trade Agreement and Canada-European Union Comprehensive Economic and Trade Agreement), the

supplier must ensure compliance with such trade agreement and furnish evidence of such compliance to Seneca.

- d) In addition to Seneca Polytechnic's safety policies and procedures, Seneca's Contractor Safety and Due Diligence Policy requires all contractors, sub-contractors, and their employees and agents to adhere to all relevant legislation, including the minimum age requirements to work in the province of Ontario.
- e) Seneca Polytechnic's Whistleblowing Policy sets out a safe and confidential method for its students and employees to report observations or activities that are evidence of improper activity or a violation of law.
- f) Seneca Polytechnic abides by the Broader Public Sector Procurement Directive (Ontario), including its Supply Chain Code of Ethics. The Supply Chain Code of Ethics affirms Seneca's commitment to work continuously to improve its supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share leading practices to ensure an ethical, professional, and accountable supply chain.

FORCED LABOUR AND CHILD LABOUR RISKS

Seneca Polytechnic is working to identify specific risks of forced labour and child labour that may exist in its supply chains. It is aware that there may be higher risks associated with certain regions, goods, and industries.

REMIEDIATION MEASURES

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

REMIEDIATION OF LOSS OF INCOME

Seneca Polytechnic 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. As such, Seneca has not undertaken any income remediation measures.

TRAINING PROVIDED TO EMPLOYEES

Seneca Polytechnic provides regular employee training, including with respect to safe and legally compliant workplace practices and policies. Going forward, it will assess what training specific to forced and child labour may be appropriate.

ASSESSING EFFECTIVENESS

Seneca Polytechnic does not currently have specific policies and procedures in place to assesses its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its supply chain. In the upcoming years, Seneca Polytechnic intends to explore any

methods that it can use to assess Seneca’s effectiveness in ensuring that forced labour and child labour are not being used in its supply chains and activities.

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 of Seneca College of Applied Arts and Technology (o/a Seneca Polytechnic) has executed this report as of the effective date of the signatures set out below.

SIGNED

May 24, 2024

Date


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Name: David Agnew

) Title: President

) I have authority to bind Seneca Polytechnic

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