# Bill S-211
# Fighting Against Forced Labour and Child Labour in Supply Chains Act

University of New Brunswick

## Introduction

This report has been prepared for the financial year ending April 30, 2024, pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**"). This report describes the steps that the University of New Brunswick ("**UNB**") has taken to prevent and reduce the risk of forced and child labour in UNB's supply chain.

UNB's Board of Governors approved this report as attested below on December 4, 2024.

## 1. Structure, Activities, and Supply Chains

UNB is a corporation incorporated under the *University of New Brunswick Act* (New Brunswick) (the "**Act**") which is a provincial statute of New Brunswick. The Act outlines the governance structure, powers, and functions of the University, as well as its relationship with the provincial government. It establishes UNB as a public institution of higher education and grants it the authority to confer degrees and diplomas. The Act also outlines the composition and responsibilities of the University's Board of Governors and Senate, which are key governing bodies responsible for overseeing various aspects of UNB's operations.

### UNB's Business and Activities

UNB is Canada's oldest English-language university, and New Brunswick's only national comprehensive university. Founded in 1785, the multi-campus institution has a rich history as well as a dynamic focus on research, innovation, experiential learning and entrepreneurship. UNB welcomes more than 10,000 students from 100 countries to its campuses. With over 100 programs in 14 faculties, UNB helps students acquire the abilities needed to make an impact in their communities.

UNB's mission is to inspire and educate its people to become problem solvers and leaders in the world, undertake research that addresses societal and scientific challenges, and engage with its partners to build a more just, sustainable and inclusive world.

At present, UNB has locations in Fredericton, Saint John and Moncton. UNB also conducts research in various parts of the world.

### UNB's Supply Chain

In fiscal 2024, UNB purchased and imported goods primarily from the United States, the United Kingdom, China and Germany. UNB imported goods mainly related to research which would include chemicals, laboratory supplies and equipment.

UNB's supply chain includes a wide range of products and services spanning across various sectors including but not limited to, textbooks, chemicals, laboratory supplies, laboratory equipment, other equipment, stationery and apparel.

UNB aims to source locally to the greatest extent possible.

## 2. Policies & Due Diligence Procedures

All UNB procurement contracts require suppliers to adhere to all applicable laws, including federal, provincial, municipal, local, or other laws, rules, statutes, regulations, orders, codes, judgments, decrees, treaties or other requirements having the force of law.

Standard Supplier Terms and Conditions

UNB uses a set of standard terms and conditions with all purchase orders to suppliers and includes technical requirements such as providing services or products in accordance with the laws and statutes of New Brunswick including workers' compensation and employment insurance laws and all other applicable laws, codes, regulations, rules and orders. It addresses warranties and defects, indemnities, limitations on contract re-assignment, and ethical behaviour.

While the standard purchase order terms & conditions do not currently reference requirements related to forced and child labour, we are in the process of revising our standard language to do so.

Code of Ethical Conduct for UNB Apparel Suppliers and Subcontractors

Procurement of clothing and other apparel products at UNB is subject to UNB's Code of Ethical Conduct for UNB Apparel Suppliers and Subcontractors (the "Code"). The Code has been in place since 2007 and stipulates that all apparel bearing the UNB name, mark, or logo is to have no child or forced labour involved in its production, and obligates all suppliers and subcontractors to guarantee their supply and production chain also comply with the Code (see sections 4.1.2.4 and 4.1.2.5 regarding the prohibitions on child labour and forced labour respectively).

Procurement Policy

UNB's procurement policy outlines the procurement code of ethics that ensures all authorized personnel, when dealing with suppliers, adhere to an atmosphere of fair, ethical and legal business practices. While the procurement policy does not currently reference specific requirements related to forced and child labour, we are in the process of revising the policy to do so.

## 3. Forced Labour and Child Labour Risks

UNB has considered the issue of potential forced and child labour in its supply chains and has considered how its policies and procedures could be amended to better address and prevent forced and child labour in its own supply chains. A listing of imported goods was obtained from UNB's customs / import broker, and a review has begun to determine potential risk areas (e.g. industry / sector, product / service, geopolitical, etc.).

Consultation was undertaken with a variety of parties within UNB, including staff in Finance, led by Procurement Services, UNB's General Counsel, as well as external legal counsel and other colleagues in the university sector. Consultation also took place with

UNB's shared buying group, Interuniversity Services Inc., which conducted an environmental scan of materials to educate its members on the issue.

In future years, UNB plans to implement practices and policies to identify and manage risks of forced and child labour in its supply chain, including:

- establishing a Supplier Code of Conduct that explicitly addresses forced and child labour and requires attestation from suppliers that they have their own policies and procedures to ensure their supply chain is free from forced and child labour;
- expanding the Terms and Conditions document that accompanies every purchase order to explicitly address forced and child labour; and
- completing an analysis of UNB's supply chains and identifying risk areas and strategies to mitigate the risks.

## 4. Remediation Measures

To date, UNB has not become aware of any forced labour or child labour in its activities and supply chains. As a result, UNB has not taken any remedial measures.

## 5. Remediation of Loss of Income

To date, UNB has not become aware of 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 a result, UNB has not taken any remedial measures with respect to loss of income because of efforts to reduce forced and child labour.

## 6. Training

Continuous improvement is at the core of UNB's value system, and UNB is dedicated to enhancing employee's understanding and compliance to its policies and procedures. Specific to forced and child labour in supply chains, some Finance personnel have undertaken basic training by attending various webinars specifically on this topic. There are plans to internally develop meaningful training about how to identify and mitigate child and forced labour practices, in the context of UNB's procurement activities.

## 7. Assessing Effectiveness

To date, no action has been taken to assess the effectiveness of the actions UNB has taken to reduce the risk of forced or child labour in its supply chains.

That said, UNB acknowledges the importance of having effective tools and processes in place to ensure the university is in compliance with all regulations and laws. In addition to those noted above, planned next steps include:

- developing an action plan, that includes a training plan;
- establishing a Supplier Code of Conduct;
- expanding the standard Terms and Conditions;
- inventorying and analyzing UNB's existing supply chain; and
- reviewing industry best practices.

## 8. Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the *Act* by the Board of Governors of the University of New Brunswick.

In accordance with the requirements of the *Act*, and in particular section 11 thereof I, the undersigned, attest that I have reviewed the information contained in the report for the entity specified below. 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 specified above.

I make the above attestation in my capacity as the Chair of the Board of Governors of the University of New Brunswick for and on behalf of the Board of Governors of the University of New Brunswick.

I have the authority to bind the University of New Brunswick.

**THE UNIVERSITY OF NEW BRUNSWICK**

Per: _____

Name: Tom Gribbons
Title: Chair of the Board
Date: December 4, 2024