

University of Victoria Forced Labour and Child Labour Statement for the Fiscal Year ended March 31st, 2024.

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by the University of Victoria (UVic) to identify and address the risks forced labour and child labour in its business operations and supply chains during the fiscal year commencing April 1st, 2023, and ending March 31st, 2024.

UVic is committed to upholding the values of equity, diversity, inclusion and human rights in our living, learning and work environments. We are working to create a healthier and more resilient future that upholds the well-being of our region and of all life on our planet. We advance local and global issues like climate action and sustainability, social justice and equity, and health and wellness. We embrace and are guided by the UN Sustainable Development Goals.

UVic structure, activities, and supply chains

UVic is a comprehensive research university located in Victoria, British Columbia. It received degree-granting status in 1963. It was established under the authority of the University Act and is governed by a Board of Governors and Senate.

In accordance with the University Act, the Board of Governors is responsible for the management, administration and control of the property, revenue, business, and affairs of the university. This fifteen-member body consists of the chancellor, the president, two elected faculty members, one elected staff member, two students elected from the university's undergraduate or graduate student societies, and eight members appointed by the Lieutenant Governor in Council.

The campus community comprises 22,000 students, 900 faculty and thousands of professional staff. UVic is a hub of academic excellence, research innovation, and community engagement. Its activities span a diverse array of disciplines, from sciences to humanities, attracting students and scholars from around the globe. Academic core values are:

- Academic excellence and quality
- Ethical, intellectual, and scholarly integrity
- Academic freedom and freedom of inquiry
- Equity, diversity, inclusion and belonging

Research at UVic contributes to global knowledge and addresses pressing societal challenges. UVic is uniquely positioned to make a difference in five research impact areas:

- Climate, environmental change, and sustainability
- Health and wellness
- Indigenous-led scholarship
- Social justice and equity
- Technology and the human experience

With a commitment to sustainability and social responsibility, UVic actively participates in community outreach programs, promoting environmental stewardship and cultural understanding.

Our Strategic Plan outlines UVic's vision, values, and priorities. It inspires our excellence in research, creative activity, teaching, service, commitment to diversity and inclusion, and engagement to serve students, communities, and the world. Our university plans guide the operational directions for a wide range of UVic activities.

UVic Supply Chain

Procurement at UVic supports academic, research, and administration activities through a centralised Purchasing Services department. Bookstore purchases of materials for resale are managed separately. Supply chains are diverse, from educational materials and laboratory equipment to construction and maintenance services.

Total payments for goods and services, according to UVic's 2022/23 Statement of Financial Information, were close to \$305M. In fiscal year 2023/24 we imported approximately \$12.8 M in goods and equipment, mostly for research projects. Key countries of origin are the USA (\$10.3M) and OECD countries (\$1.8M).

Risks of forced labour and child labour in UVic's supply chains

Based on the Modern Slavery Index, most countries of origin for the majority of UVic imports are considered to have the lowest prevalence of modern slavery, with strong governance and strong government responses to modern slavery. Additionally, some UVic suppliers in high-risk categories such as IT hardware, research equipment, and lab consumables have established anti-slavery policies and practices. The bookstore has identified potential risks of forced and child labour in goods manufactured offshore.

Given the complexity of the university's supply chains, and the limited resources available to effectively monitor supplier performance, UVic has engaged EcoVadis, the world's largest provider of business sustainability ratings. EcoVadis conducts individual sustainability performance assessments of our supply chain partners based on relevant supplier policies, practices, and results. The assessment focuses on twenty-one sustainability criteria that are grouped into four themes: Environment, Labor and Human Rights, Ethics and Sustainable Procurement.

EcoVadis' expertise in corporate social responsibility enables them to produce internationally comparable ratings and detailed scorecards that highlight the strengths and improvement areas of supplier performance. In particular, the EcoVadis reports help determine supplier performance in relation to human rights and labour practices, including child labour and modern slavery.

If supplier performance results do not meet the expectations under our supplier code of conduct, the university will invoke the contract terms of the supplier code and/or work with the supplier to understand remediation steps and future actions. If this not forthcoming, we would terminate the agreement. To date, we have not had any such incidents.

Policies and due diligence

Purchasing Policy and Supplier Code of Conduct

UVic is committed to respecting human rights and ensuring that child labour and modern slavery are not present in our supply chain. UVic's Purchasing Policy (FM5105) guiding principles include the application

of triple bottom line considerations that recognize financial, social, and environmental impacts of purchases. To that effect, UVic established a Supplier Code of Conduct (SCoC) in early 2020. The SCoC applies to all suppliers who provide goods or services to UVic, as well as their subcontractors. It establishes the minimum ethical, social, and environmental standards expected of UVic suppliers. Additional requirements may be described in individual contracts executed with UVic.

This SCoC is intended to support our commitment to environmental, social and institutional sustainability by clearly establishing minimum standards required to do business with UVic, in alignment with triple-bottom-line procurement goals identified in UVic's Sustainability Action Plan.

Modern slavery is a potential issue that the sustainable procurement initiative aims to address. While anti-slavery laws have existed in Canada for centuries, the problem of slavery still exists and is flourishing in the complexities of global supply chains. UVic's Sustainable Procurement Initiative allowed UVic to investigate, report on, and mitigate human rights violations in its supply chain.

UVic's Supplier Code of Conduct prohibits suppliers from using child or forced labour and sets minimum standards for other human rights violations associated with modern slavery, including wages, disciplinary practices, and hours of work.

The SCoC also aligns with the International Labour Organization's Declarations on Fundamental Principles and Rights of Work, the United Nation's Sustainable Development Goals, and the United Nations Convention on the Rights of the Child. While UVic believes in cooperation and is willing to work with suppliers to improve practices, when necessary, a supplier's failure to adhere to the provisions in the SCoC may be a breach of contract and could result in that contract's termination.

Sections 2 and 3 of the UVic Supplier Code of Conduct specifically state:

2. Child Labour

Suppliers will:

- a. not employ people under the age of 15 (or 14 where the International Labour Organization exemption for developing countries applies); and
- b. if a child must be displaced to comply with laws and this Code of Conduct, offer adult family members of that child a position to maintain family earnings.
- c. ensure that employees under the age of eighteen (18) shall not perform hazardous work that may jeopardize their health, safety or morals. Hazardous work includes, but is not limited to, work at dangerous heights or in confined spaces; work with hazardous substances, dangerous machinery, equipment and tools, work that involves the manual handling or transport of heavy loads; night work and long hours of work.

3. Forced Labour

Suppliers will:

- a. not use forced, illegal, or prison labour, including indentured or bonded labour, or any form of compulsory labour to manufacture products.

b. Suppliers and their subcontractors shall ensure that recruitment of employees, whether directly or indirectly, complies with applicable laws and regulations. Employees shall not pay any fees or other payments to the employer or agent for the purpose of being hired or as a condition of employment. No such fees shall be deducted and withheld from wages or otherwise passed on to the employees.

c. Suppliers and their subcontractors shall not retain employees' identity papers or passports

The Supplier Code of Conduct has been incorporated to supply contracts and services agreements using the following language:

UVic is committed to global leadership in environmental, social and institutional sustainability and expects Contractor to integrate a corporate social responsibility approach to their business practices, as reflected in the Supplier Code of Conduct ("SCoC") [available at <https://www.uvic.ca/purchasing/assets/docs/uvicsuppliercodeofconduct.pdf>]. The SCoC is hereby incorporated by reference and forms part of this Agreement.

If you are not in compliance with the SCoC, UVic will inform you in writing, including of the provisions that you have breached. You will have the time specified in the foregoing notice of breach to propose a remediation plan for approval by UVic, which remediation plan will include the time required by you to become compliant with the SCoC. If no remediation plan is submitted as required, if UVic does not approve a remediation plan within 14 days of receipt of your initial proposed remediation plan, or if you fail to achieve your remediation plan, UVic may immediately terminate this Agreement on notice in writing to you.

In cases where the supplier has an existing, equivalent code of conduct, the following language has been used:

*Supplier acknowledges the UVic's Supplier Code of Conduct ("SCoC") found at : <https://www.uvic.ca/purchasing/assets/docs/uvicsuppliercodeofconduct.pdf> and Supplier affirms it abides by its own, similar Code of Conduct found at: https://www.***. Supplier's strict adherence to its parent company, ***, Code of Conduct and policies shall be deemed to be adherence with the UVic's SCoC.*

The bookstore has a trademark licence contract that must be renewed every year with every supplier that uses the university mark. Those suppliers, who are responsible for most of the branded items manufactured offshore, must agree to UVic's Supplier Code of Conduct and carry liability insurance.

Risk assessment and management

Branded merchandise and apparel have been identified as potential higher risk commodities. To ensure UVic branded merchandise is fairly traded and ethically sourced locally, nationally, or internationally, the UVic bookstore considers the Fair Labour Association (FLA) and Workers Rights Consortium (WRC) best practices. As member of National Association of College Stores (NACS), Independent College bookstore Association (ICBA) and Campus Stores Canada (CSC) the UVic bookstore participate in and source clothing and gifts at national tradeshow that have been vetted and approved by these associations in Canada and the US.

The Purchasing Services department has recently hired a Sustainability Scholar for a 3 month research project in 2024 to develop and establish a plan for increased adoption of the business sustainability assessments amongst clients and Eco-Vadis.

Remediation

If forced labour issues in the supply chain are identified with a supplier, UVic may consider a remediation plan presented by the supplier. If no remediation plan is submitted or if UVic does not approve a remediation plan, UVic may terminate the supply agreement.

Loss of income mitigation

Since no specific cases of forced labour or child labour in UVic's supply chains have been identified and measures taken to eliminate such practices, the university has not taken steps to remediate the loss of income to the most vulnerable families.

Training

At UVic, a variety of staff, faculty, and leadership are developing training initiatives which teach and address the United Nations Sustainable Development Goals. CIFAL Victoria has created a [data dashboard on SDGs at UVic](#), showing over one hundred current initiatives. Fifty-four of those initiatives are related to SDG 8 – Decent Work and Economic Growth, which includes Target 8.7: end modern slavery, trafficking, and child labour.

UVic's Purchasing Services staff receive ongoing training on sustainable procurement and have an understanding of modern slavery risks. Internal clients and suppliers are frequently engaged one-on-one by Purchasing Services staff to consider supply chain environmental and social impacts and collaborate to conduct business sustainability assessments. UVic organized a presentation on [Modern Slavery in Supply Chains and the Case for a Supplier Code of Conduct](#) at the 2021 Canadian Association of University Business Officers (CAUBO) conference and has continued to collaborate with stakeholders to raise awareness of the issues and mitigate risks.

The Purchasing Services team, including Purchasing Officers and Buyers, have been trained on Sustainable Procurement. The training includes awareness of the UVic Supplier Code of Conduct, how to incorporate the SCoC in public competitions and university contracts, and an understanding of the EcoVadis business sustainability assessments.

The Financial Services Training Series training material on Purchasing Services, for faculty and staff, includes an overview of the SCoC, as well as the business sustainability assessments, highlighting the labour and human rights theme.

Monitoring

UVic relies on EcoVadis business sustainability ratings to monitor the performance of suppliers enrolled in their assessment program, including on labour practices and human rights. The assessments examine the potential for modern slavery in the upstream supply of raw materials and components, as well as in manufacturing facilities. By March 2024, 55 suppliers have been assessed, and 19 are in progress. Over the course of the next reporting year, UVic intends to continue engaging key suppliers to be assessed by

EcoVadis, setting clear key performance indicators, and monitoring supplier performance on labour and human rights practices.

Sign off

*** The report must be presented to UVic's governing body and approved. ***

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the fiscal year ending March 31, 2024. It has been issued on behalf of the University of Victoria Board of Governors.

Signed,

A handwritten signature in black ink, appearing to be 'Erinn Pinkerton', written over a horizontal line.

Erinn Pinkerton, Acting Chair
Board of Governors
University of Victoria