



# 2024 Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

## Introduction

This report has been prepared by the Vancouver Island University (“VIU” or the “University”) in respect of Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for our financial year ending March 31, 2024.

VIU recognizes the importance of improving transparency over workers impacted by Canada’s supply chain. We are committed to continuously improving our awareness and assessment of the risks of forced labour and child labour in our procurement activities.

## Structure

VIU is a publicly funded post-secondary educational institution incorporated under the British Columbia *University Act* as a special purpose teaching university. VIU offers diploma, career trades, undergraduate and graduate programs. Our head campus is in Nanaimo, with additional campuses in Cowichan, Parksville, and Powell River.

The University is a registered charity governed by a Board of Governors and the VIU Senate. The Board of Governors manages, administers, and directs the corporate affairs of the University, while the VIU Senate is responsible for all academic and curriculum-related matters, including development of academic policy, curriculum content, and student performance issues.

We are committed to building strong partnerships with Indigenous communities, deepening equity, diversity, and inclusion, and supporting the UN Sustainable Development Goals, which we signed in 2022.

## Activities and supply chain

Through our Nanaimo campus, Cowichan campus, and online bookstores, we sell trade books, clothing, gift merchandise, stationery, art supplies, and packaged food. Our VIU Student Spa Clinic sells esthetic products. Our food services on our campuses are a combination of in-house services and outsourcing to reputable food service providers.

The goods sold in our bookstores, the food in our in-house services, and the equipment, supplies, textbooks, research materials, information technology, and furniture used in our operations and programs are primarily sourced in Canada. A minimal amount (less than 4% of our total spending) are imported, including from the United States, Europe, South America, Australia, and Asia.

VIU is a member of BCNET, BC Petroleum Products Buying Group, Canoe Procurement Group of Canada, BC Corporate Supply Arrangement, Canadian Association of University Business Officers, and Campus

Store Canada. We leverage these relationships to collaborate and share resources on supply chain practices, including ethical procurement.

## **Steps to prevent and reduce the risks of forced labour and child labour**

Steps taken to prevent and reduce the risks of forced labour or child labour in our operations and supply chain in this reporting year included:

- Mapping the location of our direct suppliers
- Purchasing primarily from Canadian suppliers
- Continuing to adopt ethical purchasing principles
- Amending our purchasing contracts to require suppliers to comply with core labour conventions, Canadian laws, and ethical standards and expressly prohibiting the use of forced labour or child labour
- Continuing our relationships with BCNET and other procurement organizations to increase our leverage and understanding of ethical procurement practices
- Continuing to implement policies and standards of conduct to protect the rights of workers in our operations and comply with safety, human rights, and employment laws
- Encouraging employees to report any act or omission that may pose specific danger to the life, health, or safety of persons
- Training employees on human rights and health and safety

## **Policies and due diligence**

Our policies and due diligence procedures incorporate sustainable business practices in our internal operations and procurement practices. We are committed to maintaining the highest standards of ethical conduct and promoting a culture of honesty, transparency, and accountability.

Our Purchasing Policy requires our purchasing department to carry out all procurement in an ethical manner, conform to the Code of Ethics of the Purchasing Management Association of Canada (PMAC), and give priority to local suppliers when acquiring goods and services. We use standard Purchase Order Standard Terms and Conditions that are incorporated into each of our purchase orders with our suppliers.

Our Procurement and Contract Services Policy requires our contract services department to review contracting documents for compliance with VIU policies and procedure. VIU is developing a standard contract review checklist that includes risk assessments and escalation processes.

We recently amended our standard Goods Agreement to require certain suppliers to comply with the core labour conventions of the International Labour Organization, Workers' Rights Consortium, Canadian laws, and other applicable ethical standards. These terms expressly prohibit forced labour and restrict the use of child labour in any stage of manufacturing.

VIU has adopted workplace policies and standards of conduct that prevent the risks of forced labour and child labour in our operations, including:

- Our Health & Safety Policy, Employee Health and Safety Orientation Policy, and Responsibility for Health & Safety Procedure ensure that all our employees, including new and young workers, are properly instructed and trained to work safely. Our employees are required to attend safety training

programs and meetings and to report any work-related accident, injury, hazardous work practice, work condition or workplace violence.

- Our Human Rights Policy sets expectations to provide a work environment that is free of harassment and discrimination.
- Our Policy on Prevention of Violence in the Workplace prohibits any act of violence against employees.
- Our contractors are required to verify the name, date of birth, education, qualifications, and employment history of individuals used in their operations. VIU has the right to conduct a security-focused interview with any individual if VIU identifies a reasonable security concern.

## **Assessing risks of forced labour and child labour**

VIU adopted a formal enterprise risk management process for our senior management team to identify risks and report regularly to the Board of Governors. This process enables VIU to identify and document emerging risks related to our operations.

To date, we have not identified risks of forced labour or child labour in our activities or direct supply chain. Based on reports from the Canadian government and other international organizations, risks of forced labour and child labour exist in Canada's extended supply chain. We are committed to reviewing and updating our risk assessment as transparency over Canada's supply chain increases.

## **Remediation measures and remediation of loss of income**

VIU has established a confidential process for employees and contractors to disclose any wrongdoing, such as an act or omission that may pose specific danger to the life, health, or safety of persons. VIU does not condone reprisal or any measure that adversely affects the conditions of employment of a person who makes such a disclosure.

VIU is not aware of any incidents or reports of forced labour or child labour in respect to our operations or supply chain, and as such, we have not taken any remediation measures or remediation of loss of income to families as a result of forced labour or child labour.

## **Employee training**

VIU provides training to our employees on health and safety, human rights, equity, and diversity. In this reporting year, we did not develop training for our employees specifically related to the risks of forced labour and child labour in supply chains.

## **Assessing the effectiveness of our approach**

In this reporting year, we did not adopt processes to specifically assess the effectiveness of our approach to preventing and reducing the risk of forced labour and child labour in our supply chains. Moving forward, our enterprise risk management process enables VIU to document and evaluate our approach to supply chain risks as transparency over Canada's supply chain increases.

## **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.

Dated in the City of Nanaimo, British Columbia, this 24 day of October, 2024.



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Karen Bittner, Acting Board Chair

I have the authority to bind the Vancouver Island University