



Inspiring Lives

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

Entity Report for Wilfrid Laurier University

May 1, 2023 to April 30, 2024

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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 or entities 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.

Full name: SIMON CHAN

Title: VICE CHAIR

Date: JUNE 6th, 2024

Signature: 

I have the authority to bind Wilfrid Laurier University.

Reporting Details

Reporting entity's legal name: Wilfrid Laurier University

Financial reporting year: May 1, 2023, to April 30, 2024

Identification of a revised report: N/A

Business number(s): 108208786RT0001

Identification of a joint report: N/A

Identification of reporting obligations in other jurisdictions: N/A

Entity categorization according to the Act: Entity (University)

Sector/industry: Public Sector / Higher Education

Location: Waterloo, Ontario, Canada

Introduction

With origins dating back to 1911, Wilfrid Laurier University is a post-secondary university with locations of operation in Waterloo, Brantford, Kitchener, Toronto, Milton, and Yellowknife.

Wilfrid Laurier University is committed to academic excellence. Laurier's holistic approach to learning integrates innovative programming with hands-on experience outside the classroom to ensure Laurier graduates are not only ready for the future but are inspired to leave their mark on the world. Community is at the heart of everything the university does. Laurier inspires students to engage in campus life and the broader community, leading to high levels of student satisfaction and engaged alumni who carry the Laurier legacy throughout the world. As a community of researchers, leaders and educators, Laurier builds knowledge that serves society and creates connections that have a lasting impact.

In 2022, it was estimated that the university had 1,262 full-time employees and 572 full-time faculty. In winter 2023 it was estimated that the university had 16,385 full-time undergraduate students, and 1,186 full-time graduate students. To learn about the university's [strategic plan](#), [mission](#), and more, please visit [wlu.ca](#).

University Structure

Wilfrid Laurier University was created by a special act of the Ontario Legislature in 1973 (Wilfrid Laurier University Act (the Act)) and is classified as a not-for-profit corporation in the province of Ontario.

The university has a bicameral governance system. The bicameral governance system provides for two separate and distinct governing bodies: the Senate and the Board of Governors. The powers of both the Senate and the Board of Governors are set out in the Act.

While each governing body has its own responsibilities, there are many areas where both bodies must act to advance a university initiative. The Act also outlines the membership of each governing body, which is broadly representative of the university community and external stakeholders. Each governing body has appointed and elected members, with cross-appointments to ensure open communication between the two.

Office of the President

The president of Laurier is appointed by the Board of Governors, following advice from the Senate. The president is the chief executive officer of the university and has supervision over, and direction of, the academic work and general administration of the university, the members of faculty, officers, employees, and students thereof, and such other powers and duties as from time to time may be conferred upon or assigned to the president by the Board of Governors.

The Board of Governors, following advice from the Senate, also appoints a vice-president: academic, and may appoint one or more additional vice-presidents who make up the university's senior leadership team.

University Secretariat

The University Secretariat provides professional advice to and facilitates the work of the Senate, Board of Governors, their committees and councils, participants and resources on all matters relating to university governance. The Secretariat is responsible for supporting the development, revision, and interpretation of university-level policies, and keeping the official records of governing documents and records of decisions made by the governing bodies.

Activities, Supply Chain and Potential Areas of Risk

The university's primary business is as a post-secondary university with administrative and ancillary units which support operations. Specific business units or ancillaries identified in this report sell or resell goods to the university community and/or public.

Goods for Resale

Campus Store (Hawkshop)

The university's campus store operates locations at the Waterloo and Brantford campuses as well as its website. Merchandise includes but is not limited to printed books, apparel, giftware, stationery, and limited technology (USB cables, earbuds, etc.). The Hawkshop estimates its cost

of goods sold for physical merchandise to be \$1.4 million CAD excluding digital material, internally printed course packages, and freight. Most goods are purchased through small businesses, while some goods such as electronics may be purchased through multinational companies.

Locations of Hawkshop Tier One Suppliers:

Supplier location	% of Purchases
Canada	80%
USA	20%
Overseas	0%
Total	100%

A significant portion of goods are sourced through Canadian businesses, with approximately 20% purchased from suppliers in the United States. As discussed below under "Potential Areas of Risk", the Hawkshop is cognizant of the risks in the supply chain in some categories such as promotional products, apparel, and electronics through tier 2 or tier 3 suppliers and has identified areas in which university policy on ethical sourcing has been unevenly applied and followed.

University Press

The University Press is a small publishing house specializing in social sciences and humanities books. This fiscal year, they published 16 print titles and 8 audiobooks. Currently, they have over 700 titles in print. The University Press has an international distribution network with centers in Toronto, Ontario; Lavergne, Tennessee, USA; and London, England. Books are produced domestically for North American distribution, while international orders are fulfilled through print-on-demand partners. The University Press does not import goods, and its operations are based at Wilfrid Laurier University in Waterloo.

Food Services

The university utilizes a third-party provider for its food services. Food and beverage products are sourced and provided by the third-party contractor under this agreement. While the service provider endeavours to purchase local, seasonal, and responsibly raised, grown and sourced products whenever possible, there may be a risk of forced/child labour down the supply chain in some categories or subset of categories. The third-party provider requires that its suppliers to comply with all applicable laws and they have policies and procedures which set expectations for their suppliers regarding human and labour rights, including child and forced labour. These policies and procedures are as follows:

- A human rights statement
- A business conduct policy
- A supplier code of conduct

Imports into Canada

As of April 1, 2024, the university imported goods with a total value of \$696,000 CAD for the fiscal year through its customs broker. This includes an estimated 170 shipments containing approximately 9400 items in total. Only 23% of those shipments contained items with certificates of origin from outside of Canada or the United States. Most of these imports spanned the following categories:

- Apparel
- Books
- Electronics
- Laboratory supplies and chemicals
- Promotional or licenced products
- Scientific equipment

These imports were low in quantities with certificates of origin from the following countries:

- Australia
- China
- France
- Germany
- Honduras
- India
- Japan
- Pakistan
- Philippines
- Republic of China
- Romania
- Singapore
- Sweden
- Switzerland
- Taiwan
- United Kingdom

Imports with certificates of origin from Canada and the US covered the same categories.

University Supply Chain

The university conducts procurement activities in accordance with its Procurement and Tendering Policy, Supply Chain Code of Ethics as well as relevant directives and trade agreements including but not limited to the following:

- Broader Public Sector Procurement Directive
- Canadian Free Trade Agreement
- Canada-European Union Comprehensive Economic and Trade Agreement

The university's Procurement Services department oversees the majority of procurement activity within the University. While procurement activities below \$100,000 are decentralized, reviews under specified conditions are embedded into workflows in the university's procure-to-pay system to confirm alignment with the university's procurement policy. In cases where policy has not been followed, and the goods have already been received, services rendered, or a contract executed, the Procurement Services department uses the opportunity to educate regarding policy requirements to reduce the risk of recurrence. The university also utilizes a corporate paid purchasing card program for low dollar procurements and eligible expenses which are routed through the university's expense management system for after-the-fact approval by the cardholder's manager or designated approver. Due to the volume of transactions, the university's corporate card auditor is not able to audit all transactions but does utilize workflow routing in an attempt to mitigate risk. Some units, such as the Hawkshop and university library, conduct procurements independently using different systems. Many of these acquisitions fall outside of public procurement and tendering requirements.

Where public competitive procurement is required, the university uses these principles to engage in fair, open, and transparent processes. Where feasible, the university also leverages collaborative procurement opportunities and vendor of record arrangements such as those available through local purchasing cooperatives, Ontario Education Collaborative Marketplace (OECM), or Supply Ontario to increase efficiencies, and achieve economies of scale.

Examples of goods and services procured by the university to support operations include but are not limited to:

- Apparel (sports uniforms, staff uniforms, goods for resale etc.)
- Architectural and engineering services
- Athletic equipment and supplies
- Books and periodicals
- Construction services and trades
- Consulting services
- Custodial services, supplies, and equipment
- Financial services
- Food services
- Furnishings and appliances

- Information technology products, services, and electronics
- Laboratory supplies and chemicals
- Legal services
- Marketing and advertising services
- Maintenance repair and operating supplies
- Paper and office supplies
- Promotional and licenced products
- Safety supplies and equipment
- Scientific and/or research equipment
- Security services
- Vehicles
- Waste management services

From May 1, 2023, to April 21, 2024, a total of 12,691 purchase orders were created in the university's procure-to-pay system and issued to 1553 vendors. Over 95% of those purchase orders were issued to businesses within Canada. This includes a broad range of goods and services, many of which may be considered out of scope of the Act, or less at-risk for the use of child or forced labour.

Location of PO Fulfillment Address	Sum of PO Count	% PO Count	Sum of PO Spend (CAD)	% Sum PO Spend (CAD)
Canada	12091	95.27%	\$75,355,325	89.62%
Other	600	4.73%	\$8,723,475	10.38%
Grand Total	12691	100.00%	\$84,078,800	100.00%

While this is not a comprehensive list of all university procurements during the reporting period, a high-level review was completed of the purchase orders created during this period. This was not intended as a supply chain mapping exercise but rather as a first step to identify potential areas of risk with respect to the Act.

Potential Areas of Risk

Canadian businesses, or businesses with a Canadian fulfillment address form the majority of known suppliers to the university this fiscal year. As certificates of origin can currently only be confirmed for procurements where the university is the importer of record, there may be potential risk for forced and/or child labour in the supply chain via direct imports, or through tier 2 or tier 3 suppliers. The US Department of Labor report: 2022 List of Goods Produced by Child Labor or Forced Labor was consulted for the development of this list. Categories or subsets of these categories may include but may not be limited to:

- Apparel

- Food and beverage
- Furniture
- Information technology products, and electronics
- Laboratory supplies and chemicals
- Paper and office supplies
- Promotional and licensed products
- Safety supplies or equipment

Policies and Due Diligence, Remediation, Assessment of Effectiveness, and Training

In addition to the policies mentioned under our supply chain activities, the university has an existing policy which aspires to reduce the risk of child and forced labour in the supply chain of apparel and licensed goods. 5.9 Ethical Purchasing Policy, is a supplier code of conduct which applies to contracts in scope which include but are not limited to:

- a) All suppliers entering into contracts with the university that have a value of greater than \$50,000 and a duration of longer than one year.
- b) All suppliers entering into contracts with the Hawkshop that have a value of greater than \$10,000 and a duration of longer than one year.
- c) All suppliers entering into a contract with Laurier Athletics that have a value of greater than \$25,000 and a duration of longer than one year.

The code places the onus on the suppliers who indicate compliance to ensure that all subcontractors within their supply chain are also compliant.

The policy speaks to:

1. **Remediation** - If the university determines that any supplier or licensee has failed to comply with the policy, then upon consultation with the party, the university may require that the party implement a corrective action plan on terms acceptable to the university. The remedy will include taking all those steps necessary to correct such violations including, and without limitation, paying all applicable back wages, or any portion of them, found due to workers. Wilfrid Laurier University reserves the right to terminate its relationship with any supplier or licensee that continues to conduct its business in violation of this code.

If abusive conditions are discovered at a production worksite and exposed to public view, the supplier must endeavour to correct conditions and not to make a quick exit from the site. Suppliers and licensees shall not shift orders from a production worksite in response to successful worker organization and collective bargaining or due to contractor meeting or exceeding the standards set in this code.

2. Standards regarding:

- a. Forced Labour
- b. Child Labour
- c. Harassment or Abuse
- d. Discrimination
- e. Hours of Work
- f. Freedom of Association and the Right to Bargain Collectively
- g. Wages and Other Compensation
- h. Health and Safety
- i. Employment Relationship
- j. Reproductive Rights
- k. Local Labour Laws
- l. Universal Declaration of Human Rights

3. **Compliance and Disclosure requirements for suppliers** - This section covers disclosure requirements with respect to supplier locations, contact information and compliance with the code.

While this policy provides a strong foundation and addresses many key elements with respect to child and forced labour, a review is important to ensure it covers adequate scope. The policy does not contain language with respect to assessing the effectiveness in ensuring that forced labour and child labour are not being used in our supply chains. Further work will be needed to ensure the policy is consistently embedded into all applicable contracts within its scope on a go-forward basis.

There is currently no general training that is offered to the university community with respect to this policy. A training and communication strategy will be developed and launched once the policy is reviewed, updated, and approved.

Steps taken over last fiscal year to reduce risk of forced and child labour

In preparation of this report, discussions were held with named departments in the university's Ethical Purchasing Policy, to determine whether the existing policy has been consistently applied to new agreements within scope of that policy, not only during this fiscal year, but also in recent years. There were also high-level, preliminary meetings with some business units not specifically named in this policy, who may engage in contracting suppliers in industries considered at-risk, but out-of-scope of the current policy's application, to learn if language has been embedded into agreements with respect to forced and child labour.

Through those discussions, it is confirmed that this policy has not been consistently embedded into all applicable contracts within its scope, nor to our knowledge have similar requirements been embedded into contracts considered out-of-scope. Through this exercise, several potential

opportunities for improvement have been identified. This policy will be considered in the execution of new contracts within scope on a go-forward basis.

The university's Ethical Purchasing Policy has not been reviewed for several years. Work will begin in the new fiscal year to review this policy and determine if the scope of application should be revised or broadened to include products or services related to other industries considered at-risk.

While a comprehensive supply chain mapping exercise has not been completed, a review of imports over this fiscal year supports the fact most of the university's imports through our broker of record are low in value, and low in quantity. The university spends a significant portion of its purchasing dollars with suppliers within Canada, where the university is in most cases, not the importer of record. While not exhaustive of all procurements, a high-level review of purchase orders issued through the university's procure-to-pay system was also conducted. While less than 5% of purchase orders issued through that system were issued to fulfillment addresses outside of Canada, there may be risks associated with the use of child and forced labour in at-risk goods and services, further down the supply chain through indirect suppliers and in purchases made outside of the system.