

Brock University

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

Public Safety Canada Report

May 2025

Brock University's 2025 Annual Report On Fighting Against Forced Labour and Child Labour in Supply Chains

Reporting entity's legal name: Brock University

Financial reporting year: May 1, 2024 to April 30, 2025

Identification of a revised report: N/A

Business number(s): R118819531

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: St. Catharines, Ontario, Canada

A large, abstract red graphic at the bottom of the page, consisting of several overlapping, rounded shapes that create a sense of depth and movement, extending across the entire width of the page.

About Brock University

Located in the scenic Niagara region, Brock is a progressive, welcoming university set in a safe and pleasant community that is just an hour from the GTA. Brock's main campus sits atop the Niagara Escarpment — a UNESCO World Biosphere Reserve — overlooking the city of St. Catharines. With nearly 19,000 students engaged in more than 100 undergraduate and graduate programs in seven diverse Faculties, Brock's academic excellence is enriched by renowned experiential learning opportunities and a highly rated student experience. Brock currently operates 3 campuses, all of which are located and operated in Ontario, Canada.

As part of Brock University's Strategic Plan, the University's purpose is for transforming people, reimagining the future through curiosity, creativity, and courage. We are committed to our strategic direction: shaping tomorrow through research, discovery and knowledge, building sustainable futures, realizing you matter, and bringing the world to Brock, and Brock to the world. As stewards of public and private resources, the University holds itself accountability for performance and outcomes, particularly in promoting ethical practices within our supply chain. We are dedicated to preventing and reducing the risks of forced and child labor by upholding rigorous standards in the evaluation and selection of suppliers. This ensures that all operations align with our values of human dignity, fairness, and respect for human rights, while prioritizing sustainability, ethical sourcing, and fair labor practices. [Brock University Strategic Plan 2025-2030 \(brocku.ca\)](https://www.brocku.ca/strategic-plan)

In this 2nd Annual Report, we outline information as required under section 11(1) and 11(3) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act. More specifically, we describe the steps Brock has taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by Brock.

Reporting Entity and Structure

Brock University was incorporated in 1964 through The Brock University Act. The University is led by a bicameral system of governance consisting of two governing bodies, the Board of Trustees and the Senate. The Board of Trustees is responsible for the government, conduct, management and control of the University and of its property, revenues, expenditures, business and affairs. The Senate is responsible for the educational policy of the University and, with the approval of the Board in so far as expenditure of funds is concerned, may enact by-laws and regulations for the conduct of its affairs.

Brock has a well-defined organizational structure that supports its academic and administrative functions. There are approximately 6,000 full and part-time employees working at Brock. All employees work in Canada and are subject to Canadian labour laws.

Activities and Supply Chain

Brock's core business activities revolve around provision of educational services, advancing research and development initiatives, and community engagement. As a component of these activities, Brock has a Campus Store offering an array of textbooks and course materials, electronics, office supplies, as well as a selection of promotional merchandise and apparel.

Business activities related the importation of goods:

Brock purchases and in some cases, imports goods to support the administration of academic and student services, research and development, marketing and communications and facilities management. Related supply chain activities include:

- Acquisition of goods and services needed for University operations (information technology, office supplies, lab equipment, facilities management)
- Campus store – sale of goods in Canada, a small proportion of which are imported (textbooks, apparel, electronics, office supplies and promotional products)
- Athletics (apparel, equipment, and supplies for sports teams)
- Student Supplies (lab supplies, classroom supplies, art supplies)
- Acquisition of goods for research (lab supplies, chemicals, and equipment)
- 8 residences providing accommodation to students
- On campus food services

Brock University's spend for fiscal reporting year May 1, 2024, to April 30, 2025, is approximately \$160M of which an estimated 89% is with from Ontario suppliers and 94% is with Canadian suppliers leaving \$9.6 million of total spend sourced from other countries.

Direct imports into Canada

Of the \$9.6 million spend outside of Canada, direct importations of physical goods crossing the border represent approximately \$1.6 million or 1.0% of the University's total spend. These imports originated from 33 countries listed below:

- USA (75%)
- China (7%)
- Sweden (7%)
- Italy (3%)
- United Kingdom (2%)
- Germany (1%)
- Japan, (1%)
- Vietnam (1%)
- Imports from the remaining 25 countries were less than 1% each (3% Total)

The following categories of goods were imported directly in the previous fiscal year:

- Books/Textbooks

- Research Supplies
 - Lab supplies, reagents, and chemicals
 - Rodent bedding and animal feed
- Apparel and promotional materials
- Scientific equipment
- Office supplies
- Electronic equipment

Policies and Due Diligence

The University has adopted policies and responsible business conduct due diligence practices which govern our activities and aim to reduce the risk of modern slavery in our operations and supply chain. These include:

- Ontario Broader Public Sector Procurement Directive
- Procurement Policy and Procedures
- Supplier Code of Conduct
- Investment Policy
- Fair Trade Campus Certification

Ontario Broader Public Sector Procurement Directive

As an organization that is governed by the Ontario Broader Public Sector Procurement Directive, Brock University engages in ethical, fair, and transparent procurement practices which align with the Supply Chain Code of Ethics contained within the Directive. We continuously work with our supply chain partners to improve purchasing practices and to ensure the best value for money.

In support of this Directive, the University seeks out opportunities from collaborative purchasing groups whenever feasible. This includes partnering with the Ontario Education Collaborative Marketplace (OECM), initially established by the provincial government to promote collaboration, as well as participating in collaborative Vendor of Record (VOR) arrangements offered by Supply Ontario. The University is working with OECM to verify that awarded suppliers have furnished an attestation of compliance with ethical principles and employment standards, ensuring goods and services are free from forced or child labor, aligning with International Labour Organization practices.

The Directive also outlines requirements under the Building Ontario Business Initiatives Act (BOBIA) established by the Ontario government, as of April 1, 2024, that requires the University to give preference to Ontario businesses for the procurement of all goods and services, wherever feasible. In compliance with this Directive, Brock has implemented new procedures to ensure compliance and allow for trackable KPI's.

Procurement Policy and Procedures

[Information for vendors \(brocku.ca\)](https://brocku.ca)

- **Brock University Procurement Policy states:**

Decisions regarding purchasing and the award of contracts will be made in an objective manner that takes into account that social factors, including the policies or practices of any supplier that affect freedom of association, payment of a living wage, non-discrimination on grounds protected by the Ontario Human Right Code, freedom from intimidation and the right to a safe and healthy working environment and the right to freely choose employment, regardless of whether or not that supplier is located inside or outside Ontario. The University will also take steps to maintain its recognition as a national designated “Fair Trade Campus”

- **Notice to vendors regarding procurement social and environmental objectives states:**

Brock University Procurement Services, where practical, will take social and environmental factors into consideration alongside financial factors in making decisions on the purchase of goods and services.

Our ethical objective is to ensure that people in the supply chain are treated with respect and rights with regard to employment including the rights to freely choose employment, freedom of association, payment of a living wage, working hours that comply with national laws, equal opportunities, recognized employment relationship, freedom from intimidation and to a safe and healthy working environment. It is also our objective to maintain Brock University’s recognition as a national certified “Fair Trade Campus.”

- **Supplier Code of Conduct**

As part of the University’s ongoing efforts to combat forced and child labor in our supply chains, Brock has adopted a new Supplier Code of Conduct (SCOC). This code, developed with input from various industry and university sources, including the Ontario University Professional Procurement Management Association (OUPPMA) and major multinational organizations, sets minimum standards for suppliers while encouraging them to exceed industry benchmarks. The SCOC is designed to foster proactive engagement and collaboration with suppliers to enhance ethical, social, and environmental performance, with a focus on transparency and accountability. Moving forward, compliance with the SCOC will be required for all suppliers involved in contracts through Request for Proposals (RFPs), Supplier Contracts, and Purchase Orders.

- **Supply Chain Code of Ethics**

Brock University is committed to acting in an ethical, legally compliant, and socially responsible manner and requires our staff to adhere to similar standards. We have a clear code of behavior for day-to-day activity undertaken on behalf of the University. The Supplier Chain Code of Ethics sets out the minimum ethical standards and business conduct for staff, students or any individuals that procure goods or services on behalf of the University. The Supply Chain Code of Ethics references to and must comply with the Code of Ethics and Laws of Canada and Ontario.

- **Request for Tender Documents and Contractual measures**

Brock includes language in support of the policies and procedures outlined above relating to forced labour and child labour expectations in high-risk supplier contracts (namely, contracts related to food services and athletic sports apparel).

Investment Policy

- **Statement Regarding Socially Responsible Investing:**

The University believes socially responsible investing (SRI) is best embodied by the United Nations Principles for Responsible Investing (UNPRI). These principles provide a menu of possible actions for incorporating environmental, social and corporate governance issues (ESG) into mainstream investment decisionmaking and ownership practices. UNPRI does not advocate an exclusionary approach, whereby companies that operate in certain industries or geographical areas are automatically screened out of an investment portfolio. The University will encourage investment managers, to the extent possible within their investment process, to consider ESG principles as they relate to long term financial returns when making investment decisions. The University does not believe it is appropriate, recognizing its fiduciary responsibility to represent the needs of all of the various stakeholder groups, to mandate the exclusion of companies that operate in certain industries or geographical areas. [Investment Policy](#)

- **3M Canada Pension Investment Policy for the Master Trust Fund:**

Section 12 – Environmental, Social and Governance Factors

The Administrator (Brock) is cognizant of its fiduciary responsibility to make prudent decisions in the best interests of the Plan beneficiaries. This responsibility requires that there be an appropriate balance between the need to seek long-term investment returns to help secure promised pensions for all members of the Plan and the need for those returns to be delivered in as stable a manner as possible to limit downward impact (given the nature and behavior of the investment markets).

The Administrator (Brock) searches and selects the most appropriate investment managers for investing the assets of the Plan considering factors such as business, staff, historical performance and investment process, since the Administrator believes that those factors will contribute to higher investment returns in the long run and will serve to manage risk in the investment of the Plan assets. The Administrator does not place added emphasis on environmental, social or governance factors (“ESG factors”) when selecting investment managers but does consider an investment manager’s processes regarding ESG factors when appropriate as part of the overall consideration of the investment manager.

The Administrator (Brock) recognizes that ESG factors can influence the risk and/or returns of certain investments. Where an investment manager’s investment style and resources permit, the Administrator expects its investment managers to take all relevant factors into account, including ESG factors, to the extent any such factors can reasonably be expected to have a material effect on the relative risks of an investment or its projected returns. If an investment manager determines that ESG factors are relevant to the selection of an

investment, the investment manager is responsible for deciding which techniques should be used to incorporate such ESG factors into the selection process. The Administrator (Brock) expects its investment managers to disclose, on a regular basis, the investment manager's statement and practices regarding ESG factors, which may include whether the investment manager is a signatory to the United Nations Principles for Responsible Investment, whether the investment manager incorporates ESG factors into their investment decisions, how the investment manager votes on shareholder proposals relating to matters involving ESG factors, and whether the investment manager has staff dedicated to research regarding ESG factors. For the purposes of this Policy, the Administrator considers ESG factors to include a broad range of matters that may be integrated into investment selection processes. [3M Canada Pension Investment Policy for the Master Trust Fund](#)

Fair Trade Campus Certification

Brock is recognized as a Fair Trade Campus – Agricultural Products designated by Fairtrade Canada. Fair trade is a market-based system that uses informed consumer support to influence international trade and business practices toward greater social and environmental sustainability. As a response to conventional trade systems, which have very often contributed to poverty and poor working conditions within developing countries, fair trade aims to build an alternative approach based on mutually beneficial relationships between producers and consumers.

Future Initiatives

Brock is committed to strengthening due diligence efforts to reduce the risk of modern slavery in our operations and supply chain by rolling out the newly adopted Supplier Code of Conduct (SCOC) in phases over the next year. The SCOC will require compliance by all suppliers and the rollout plan will include updates to procurement documents, supplier communication, and integration into new contracts. Brock also plans to further evaluate risks in our supply chain, incorporate the policies and due diligence strategies into procurement of all high-risk categories, and provide communication and training throughout the institution, as further described in this report.

Supply Chain Risks

Brock assessed the parts of its business and supply chains that carry a risk of forced labour or child labour using: (1) Canadian Collaboration of Sustainable Procurement (CCSP) guidance; and (2) the US Department of Labor's "[List of Goods Produced by Child Labor or Forced Labor](#)" (see page 38 of the 2022 list).

With respect to (1), CCSP has conducted an assessment to identify categories and sub-categories in the public sector supply chain that are at high risk of forced and child labour.

High Risk Categories	Sub-categories
Electronics	Computers, laptops, cellphones, TV's, printers
Appliances	Refrigerators, microwaves, dishwasher, etc.
Apparel / Garments	Uniforms, promotional apparel
Safety Gear	Work boots, hard hats
Promotional Products	Water bottles, mugs, gifts/trinkets
Office Furniture	Desks, chairs, shelves, etc.
Vehicles and Motorized Equipment	Fleet, vehicle components, forklifts, construction machinery, grounds equipment, etc.
Office Supplies (Paper)	Paper
Food & Beverage	Coffee, tea, other
Building's Internal Furnishings	Flooring, fixtures, textiles, Bricks, Copper, Glass, Minerals, Polysilicon/Solar Panels, Precursors (sodium carbonate, calcium carbonate), Rubber, Steel/Iron, Stone, Textiles,
Construction Materials	Timber

Based on these categories, Brock has completed a high-level assessment of related institutional spend and recognizes that supply chain risks may exist in activities surrounding the purchase of apparel/garments, promotional products, electronics, food and beverage and paper. While each of these commodities represent a very low value in proportion to the overall total spend, the University recognizes there are risks in these areas.

Brock Activities

Brock does not manufacture or produce our own goods for sale/resale.

Imported Goods

Brock has assessed all direct import transactions in the past year to determine if any of the categories identified are being imported from countries at high-risk of child/forced labour. The following imported goods that carry a risk of child labour or forced labour:

- 5% of imported apparel/garments originated from high-risk countries such as China, Malaysia, Thailand and Vietnam (.02% of total University spend on apparel/garments)
- 4% of imported promotional products originated from the high-risk country of China (less than .01% of total University spend on promotional products)
- 0.3% of imported electronics originated from the high-risk country of China (less than .01% of total University spend on electronic items)

Activities of Direct and Indirect Suppliers

Brock has identified potential risks of child labour or forced labour through the activities of our direct and indirect suppliers in the following areas:

- **Apparel and Promotional Items for Resale - Campus Store:**

The campus store purchases apparel, promotional products for resale and a low percentage (4%) of these goods were imported directly from other countries in the past year. While most of these purchases are from Canadian suppliers, we recognize that there is a risk of forced labour or child labour in the supply chains of our direct suppliers.

- **Apparel:**

The University purchases garments and apparel for use in the following areas:

- Sports Team Apparel and Uniforms
- Camp T-shirts
- Uniforms
- Safety Garments and Footware
- Other

- **Food Services:**

Brock has a long-term agreement with one food service provider who supplies all food, beverage and labour for the University. Total spend represents approximately 10% of the total university spend for all goods and services. A proportion of this spend that includes the acquisition of food and beverage products could carry risk of forced or child labour.

- **Other Direct Suppliers:**

Considering the high-risk categories we have identified, while a high percentage of our goods are purchased directly from Tier 1 Canadian suppliers, University purchases could potentially carry a risk of forced or child labour through their indirect suppliers in the following categories:

- Electronics purchases make up approximately 1.2% of total spend of goods and services
- Purchases of Office Furniture, Promotional Products, Paper, Vehicles, Food and Beverage each account for less than 1% of the University's total spend of goods and services.

Measures taken to manage risks

- **Food Services:**

Language is embedded in our RFP documents for Food Services requires compliance with our Free Trade certification as well as an assessment of potential vendors on their social objectives, including abiding by international and local labour laws for both their own organization as well as in their supply chains. To comply with Fair Trade certification, Brock requires that Food Service Providers comply with the following:

- All coffee products must be Fair Trade at all locations;

- At least three tea flavours that are Fair Trade at all locations; and
- At least one chocolate bar that is a Free Trade Product (at retail locations that sell chocolate bars)

Our Food Service Provider adheres to international and local labour standards. The service provider also requires the suppliers within their supply chain to comply with all applicable laws, and, in addition, have multiple policies and processes that expectations regarding human rights and labor rights (including child labor and forced labor). Their suppliers must adhere to their Human Rights Statement, Business Conduct Policy and mandatory compliance with their Supplier Code of Conduct, which specifically addresses forced labour and child labour. Other third-party service providers, such as Tim Hortons and Starbucks also have certifications in place as further outlined below.

- **Tim Hortons:** Utilizes The Enveritas Certification. The Enveritas Certification is a verification process that evaluates a wide range of social, environmental, and economic criteria, grounded in international protocols and conventions such as the International Labour Organization Conventions on Child Labor, Forced Labor, and Trafficking; the United Nations Conventions.
 - **Starbucks:** Utilizes C.A.F.E. Coffee and Farmer Equity Practices, which ensures farmers have fair employment conditions, wages and zero tolerance for any form of child labour.
- **Sports Team Apparel:**
Language is embedded in our RFP documents for sports team apparel to ensure garment manufacturers are either WRC (Worker Rights Consortium) or FLA (Fair Labour Association) certified or equivalent. Our current apparel contract for the purchase of athletic team apparel ensures that our supplier adheres to this requirement. Our supplier has provided a code of conduct that outlines the expectations and minimum employment standards that include voluntary employment and a minimum age of employment in their contract factories.

Ongoing and Future Measures

We will continue to primarily engage Ontario-based and/or Canadian suppliers to ensure compliant labor sources. By advocating for the use Ontario suppliers with our University, we aim to minimize the risk of outsourcing good and services to foreign suppliers that might use child or forced labour sources in their direct or indirect resources.

Brock will also continue to integrate ethical questions and expectations into RFPs for the high-risk categories in areas not currently addressed..

Remediation Efforts

There is no evidence of instances of forced labour or child labour in the University's activities and supply chains and it is not anticipated that the University's efforts to prevent and reduce risks for forced labour and child labour have result in any loss of income. Accordingly, no measures have been taken in this area.

Education and Training

Procurement Services at Brock University is committed to increasing awareness of the requirements under Bill S-211. As part of this effort, we are collaborating with the **Ontario University Professional Procurement Management Association (OUPPMA)** to develop a common training framework on forced and child labour for procurement professionals. The framework aims to help procurement professionals recognize and mitigate human rights risks in supply chains, ensure compliance with Bill S-211, and support ethical procurement practices through informed decision-making, stakeholder engagement, and supplier accountability.

To provide structured training, a **modular framework** is being developed, offering targeted guidance on key aspects of human rights in procurement:

1. **Module 1: Awareness of Human Rights in Supply Chains**
Covers procurement's role in ethical sourcing, key compliance requirements under Bill S-211, and identifying red flags in high-risk industries.
2. **Module 2: Interacting with Internal Clients on Human Rights**
Focuses on legal, financial, and reputational risks, high-risk procurement areas, and balancing cost considerations with ethical decision-making.
3. **Module 3: Interacting with Suppliers on Human Rights**
Provides strategies for setting expectations, addressing violations, conducting due diligence, and enforcing a Supplier Code of Conduct.

In parallel, the Ontario university sector is working with **CASPAR**, a national association focused on Sustainable Procurement, to develop an awareness video for their broader campus communities of decentralized purchasers. This video will cover human rights risks, modern slavery, and ethical supply chain management.

These training initiatives are expected to launch in 2025, with rollout plans to follow.

Performance Measurement

Brock continues to review procedures to evaluate the efficacy of its efforts in preventing and mitigating the risks of forced labor and child labor across all its business operations and supply chains.

Relevant Key Performance Indicators are assessed annually to help safeguard against forced labour and child labour:

- % of local sourcing by Food Service Provider*
- Fair Trade Compliance by Food Service Provider*
- % of spend with Canadian suppliers
- % of spend of direct imports originating from high-risk countries
- % of Suppliers who have adopted Brock's Supplier Code of Conduct
- % of Procurement staff who have received Forced Labour and Child Labour training
- % of Brock Community who have received Forced and Child Labour awareness training

** Failure to meet the required KPI measurements results in a financial penalty to the supplier*

Approval and attestation

This report has been approved by the Brock University Board of Trustees in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Signed: 

Name: Mark Arthur

Title: Chair, Brock University Board of Trustees

Date: May 2, 2025

I/We have authority to sign on behalf of Brock University