



2024

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

City of Winnipeg

Winnipeg, Manitoba, Canada



Vision, Mission & Values

VISION

A vibrant, healthy, and inclusive city for all Winnipeg residents and visitors.

MISSION

Achieve effective and efficient service delivery through a collaborative, engaged, and value-driven organizational culture.

VALUES

Accountability – as stewards of public assets and the work we do

Diversity – in who we are

Respect – for each individual person

Trust – with elected officials and the residents we serve

Transparency – in all we do

Land & Water Acknowledgement

Winnipeg is located in Treaty One Territory, the home and traditional lands of the Anishinaabe (Ojibwe), Ininew (Cree), and Dakota peoples, and in the National Homeland of the Red River Métis. Our drinking water comes from Shoal Lake 40 First Nation, in Treaty Three Territory.

The City of Winnipeg recognizes the importance of First Nations, Inuit, and Métis Peoples connected to Winnipeg's history, and the vibrant, diverse people who make up Indigenous communities today.

The City acknowledges the harms and mistakes of the past, and is dedicated to upholding Indigenous rights, and to moving forward in partnership with Indigenous communities in a spirit of truth, reconciliation and collaboration.

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Modern Slavery Statement — Financial year 2024

“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.”

Sherwood Armbruster
Interim Chief Administrative Officer,

City of Winnipeg May 30, 2025



“I have the authority to bind The City of Winnipeg.”

Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), imposes an obligation on certain government institutions and private-sector entities to report on the measures taken to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains.

The Act provides for an inspection regime applicable to entities and gives the Minister of Public Safety the power to require an entity to provide certain information.

The purpose of this Act is to implement Canada’s international commitment to contribute to the fight against forced labour and child labour through the imposition of reporting obligations on:

- (a) Government institutions producing, purchasing, or distributing goods in Canada or elsewhere; and
- (b) Entities producing goods in Canada or elsewhere or in importing goods produced outside Canada.

As the City of Winnipeg (City) is considered an entity under the Act and it imports goods from outside of Canada under its own name, it is required to report under the Act. The City is reporting for the calendar year January 1, 2024 to December 31, 2024.

After conducting a review of which entities, the reporting applies to, and consulting with our Legal Services Department, it has been confirmed that the City must provide a report annually by May 31.

A. Structure, activities and supply chains

The City is incorporated through The City of Winnipeg Charter Act as a legislative entity.

The City is a municipal government, with the legal name of The City of Winnipeg.

The City is in Winnipeg, Manitoba, Canada.

The political representation for the City is an elected mayor, and 15 councillors each representing a city ward. The current mayor and council were elected in October 2022. Their term of office ends in October 2026.

The administrative structure for the City is a Chief Administrative Officer who is the head of the Public Service and provides overall leadership to all civic departments. The City employs approximately 10,000 people.

B. Policies and due diligence processes in relation to forced labour and child labour

The City has a Social Procurement Framework and Sustainable Procurement Action Plan that guides its Sustainable Procurement Program.

The Social Procurement Framework was adopted by Council in January 2022.

The Sustainable Procurement Action Plan was adopted by Council in July 2022.

The City has adopted a model which promotes a comprehensive approach to sustainable procurement that addresses supply chain opportunities across four pillars:

1. Environmental
2. Ethical
3. Social
4. Indigenous

The Social Procurement Framework and Sustainable Procurement Action Plan include the ethical pillar which involves reducing ‘sweatshop labour’ by setting recognized minimum workplace standards for suppliers and subcontractors throughout the global supply chain.

This may involve assessing compliance with International Labour Organization conventions against child labour, forced labour, and employment discrimination.

Employee Code of Conduct

The City of Winnipeg is committed to offering sustainable services to our residents, and incorporating our core values of Integrity, Diversity, Respect, Accountability and Quality in every aspect of our organization. Ensuring our employees know what is expected of them related to their personal and professional conduct is important in ensuring we are an informed and transparent organization, and one that lives up to its values for the benefit of our city, residents, customers, employees, and business partners.

The purpose of the Code of Conduct policy is to provide important information and education to employees. It outlines our core values, behavioural expectations, and examples of the conduct that we expect from all City of Winnipeg employees.

In addition:

- It aligns with Canadian and Provincial legislation, City by-laws, the City Charter, City policies, Administrative Standards, and Human Resource guidelines.
- Our residents expect and deserve good conduct from the people working for our City.
- It reinforces union contracts and labour agreements.
- It aligns to external code of conduct and ethical requirements within professional associations to which our employees belong.

Purchasing Policy

The City of Winnipeg Purchasing Policy provides governance of purchasing functions and is founded on the following guiding principles: The City’s needs must be met in an effective and efficient manner. The taxpayers of the City are entitled to the best value for their taxes. All businesses are entitled to fair and ethical treatment. Procurement of sustainable goods and services.

Inclusion in Bid Documents

All procurements should review the risk of forced labour and child labour for the goods and services they will be procuring for. A list of goods and their source countries that are at high-risk to having forced labour and child labour in their supply chains (Source: US Department of Labor, List of Goods Produced by Child Labour or Forced Labour) is included in the Social Value Menu. This list is not intended to be punitive, but rather to serve as a catalyst for City of Winnipeg staff to consider how their Procurement supports the Ethical pillar of the City of Winnipeg's Sustainable Procurement Action Plan.

To work towards the goal set out above, the City includes an “Unfair Labour Practices” clause in all public bid solicitation documents.

The clause was developed to help prevent both forced labour and child labour, and is included in all bid solicitation templates as a mandatory clause that cannot be removed.

The clause is as follows:

Unfair Labour Practices

- B1.1 Further to C3.2, the Contractor declares that in bidding for the Work and in entering into this Contract, the Contractor and any proposed Subcontractor(s) conduct their respective business in accordance with established international codes embodied in [United Nations Universal Declaration of Human Rights \(UDHR\)](#) and [International Labour Organization \(ILO\)](#) conventions as ratified by Canada.
- B1.2 The City of Winnipeg is committed and requires its Contractors and their Subcontractors, to be committed to upholding and promoting international human and labour rights, including fundamental principles and rights at work covered by ILO eight (8) fundamental conventions and the United Nations Universal Declaration of Human Rights which includes child and forced labour.
- B1.3 Upon request from the Contract Administrator, the Contractor shall provide disclosure of the sources (by company and country) of the raw materials used in the Work and a description of the manufacturing environment or processes (labour unions, minimum wages, safety, etc.).
- B1.4 Failure to provide the evidence required under D7.3, may be determined to be an event of default in accordance with C16.
- B1.5 In the event that the City, in its sole discretion, determines the Contractor to have violated the requirements of this section, it will be considered a fundamental breach of the Contract and the Contractor shall pay to the City a sum specified by the Contract Administrator in writing (“Unfair Labour Practice Penalty”). Such a violation shall also be considered an Event of Default, and shall entitle the City to pursue all other remedies it is entitled to in connection with same pursuant to the Contract.

B1.5.1 The Unfair Labour Practice Penalty shall be such a sum as determined appropriate by the City, having due regard to the gravity of the Contractor's violation of the above requirements, any cost of obtaining replacement goods/ services or rectification of the breach, and the impact upon the City's reputation in the eyes of the public as a result of same.

B1.5.2 The Contractor shall pay the Unfair Labour Practice Penalty to the City within thirty (30) Calendar Days of receiving a demand for same in accordance with D7.5. The City may also hold back the amount of the Unfair Labour Practice Penalty from payment for any amount it owes the Contractor.

B1.5.3 The obligations and rights conveyed by this clause survive the expiry or termination of this Contract, and may be exercised by the City following the performance of the Work, should the City determine, that a violation by the Contractor of the above clauses has occurred following same. In no instance shall the Unfair Labour Practice Penalty exceed the total of twice the Contract value.

The City also developed a Social Value Menu that includes a list of countries and goods that may be of risk to forced labour and child labour. This social value menu resource is available for employees to review. The US resource can also be found at: [List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor \(dol.gov\)](#)

Source: US Department of Labor, List of Goods Produced by Child Labour or Forced Labour

Developed Supplier Code of Conduct

The City has developed Supplier Code of Conduct (the Code) in 2024 which was reviewed by internal and external stakeholders. The Supplier Code of Conduct outlines the minimum standards for human rights, labor, environment, and business ethics that suppliers and their subcontractors must meet to work with the City. Compliance with this code is mandatory.

The standards align with International Labour Organization (ILO) standards and support the United Nations' Universal Declaration of Human Rights. Other Applicable Legislation includes the Fighting Against Forced Labour and Child Labour in Supply Chains Act and the Customs Tariff Act. Additionally, the Supplier Code supports the City's Sustainable Procurement Action Plan, particularly in accelerating the implementation of responsibilities related to the United Nations Declaration on the Rights of Indigenous Peoples, Truth and Reconciliation Commission Calls to Action and Missing and Murdered Indigenous Women and Girls Calls for Justice.

The Supplier Code of Conduct sets out the principles applicable to any supplier and level one subcontractor that wishes to establish and maintain a business relationship with the City. By promoting these principles and applying measures to encourage compliance, The City is confirming its intention to do business with suppliers that can demonstrate solid business integrity that aligns with The City's corporate values and behaviours.

The City's Supplier Code of Conduct states that "Suppliers to The City shall abide by all applicable federal, provincial, and local laws, and regulations in conducting their business." In addition to the policy, Supplier's obligations are set out in the contractual agreements and Terms and Conditions between The City and the Supplier. All bidders on City procurements are required to comply with the Code. The Code is posted publicly and can be found at [Supplier code of conduct](#).

Fair Trade Town

The City achieved a Fair Trade Town designation on September 29, 2017.

In committing to this designation, the City serves only Fair Trade certified coffee, tea, and sugar at municipally-owned and operated venues.

Further, wherever coffee, tea, and sugar are purchased using public funds, efforts must be made to ensure the products are Fair Trade certified.

The Fair Trade movement continues to resonate as a credible means of fostering a fair and sustainable return on labor and investment and environmentally sound agricultural practices in commodities such as coffee, tea, sugar, chocolate, and bananas.

Fair Trade also advocates against the use of child labour and forced labour in agricultural supply chains.

Further details can be found at:

<https://www.winnipeg.ca/news/2017-09-29-winnipeg-officially-designated-canadas-25th-fair-trade-town>

C. The parts of our business and supply chains that carry a risk of forced labour and child labour being used and the steps taken to assess and manage that risk

Our Canadian operations are at low risk for forced labour and child labour due to the legal frameworks mandated at both the federal and provincial levels and a commitment to implementing those laws. However, we have embraced the Global Slavery Index 2023 to take into consideration the standings of different countries, if we are or are considering doing business in these regions included under ethical pillar of Social Value Menu.

D. Measures taken to remediate any forced labour or child labour

No instances of forced labour or child labour have been identified in the City of Winnipeg supply chain at this time.

E. Measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in our activities and supply chains

No measures have been taken yet to measure the effectiveness of the procurement clauses intended to remediate the loss of income to the most vulnerable peoples, or to eliminate the use of forced/child labour in the City's supply chains.

F. Training provided to employees on forced labour and child labour

The City of Winnipeg has mandatory Code of Conduct and supporting policies training for every new employee and regular refresh training. We are committed to continuous improvement regarding employees' understanding and compliance to policies and procedures, including identifying ethical practices in our organization. We are committed to enhancing our organizational development on training for procurement professionals to support the identification and mitigation of supply chain risks.

G. How we assess our effectiveness in ensuring that forced labour and child labour are not being used in our business and supply chains

No actions have been taken yet to assess the effectiveness of the procurement clauses intended to prevent and reduce risks of forced labour and child labour in activities and supply chains.

City Contact Information

Information on the City of Winnipeg is available at winnipeg.ca

Inquiries may also be directed to 311 | Outside of Winnipeg: 1-877-311-4974



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