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Report on Forced Labour and Child Labour in Supply Chains

New Brunswick Community College (NBCC)
May 20, 2025

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This report is approved pursuant to paragraph 4(a) of the Forced Labour and Child Labour in Supply Chains Act (Bill S-211, May 11, 2023).

Signed on behalf of the institution,

A handwritten signature in black ink, appearing to read 'Lindsay Bowman'.

Lindsay Bowman
Board Chair, Board of Governors

A handwritten signature in black ink, appearing to read 'Mary Butler'.

Mary Butler
President and CEO

About the Entity: New Brunswick Community College (NBCC)

1. This report is for which of the following? (Required)	
➤	Entity
2. Legal name of reporting entity or government institution (Required)	
➤	New Brunswick Community College (NBCC)
3. Financial reporting year (Required)	
➤	Fiscal year ended March 31,2025
4. Is this a revised version of a report already submitted this reporting year? (Required)	
➤	No
4.1 If yes, identify the date the original report was submitted (Required)	
➤	Not applicable
4.2 Describe the changes made to the original report, including by listing the questions or sections that were revised (1,500 character limit). (Required)	
➤	Not applicable
5. For entities only: Business number(s) (if applicable):	
➤	NBCC does not have a Provincial "Business Number" on file since the College is constituted by an Act of Legislature.
6. For entities only: *Is this a joint report? (Required)	
➤	No
6.1 If yes, identify the legal name of each entity covered by this report. (Required)	
➤	Not applicable
6.2 If yes, identify the legal name of each entity covered by this report. (Required)	
➤	Not applicable
7. For entities only: *Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Required)	
➤	No
7.1 If yes, indicate the applicable law(s). Select all that apply. (Required)	
➤	Not applicable
8. For entities only: *Which of the following categorizations applies to the entity? Select all that apply. (Required)	
Canadian business presence (select all that apply):	
➤	Has a place of business in Canada
➤	Does business in Canada
➤	Has assets in Canada
Meets size-related thresholds (select all that apply):	

	<ul style="list-style-type: none"> ➤ Has at least \$20 million in assets for at least one of its two most recent financial years ➤ Has generated at least \$40 million in revenue for at least one of its two most recent financial years ➤ Employs an average of at least 250 employees for at least one of its two most recent financial years
9.	For entities only: *Which of the following sectors or industries does the entity operate in? Select all that apply. (Required)
	<ul style="list-style-type: none"> ➤ Educational Services
10.	For entities only: *In which country is the entity headquartered or principally located? (Required)
	<ul style="list-style-type: none"> ➤ Canada
10.1	If in Canada: *In which province or territory is the entity headquartered or principally located? (Required)
	<ul style="list-style-type: none"> ➤ New Brunswick
11.	For government institutions only: *Is this a report for a federal Crown corporation or a subsidiary of a federal Crown corporation? (Required)
	<ul style="list-style-type: none"> ➤ No
11.1	If yes, which of the following sectors or industries does the Crown corporation or subsidiary operate in? Select all that apply. (Required)
	<ul style="list-style-type: none"> ➤ Not applicable
11.2	If yes, in which province or territory is the Crown corporation or subsidiary headquartered or principally located? (Required)
	<ul style="list-style-type: none"> ➤ Not applicable

Annual Report: Reporting for Entities

1.	What steps has the entity taken in 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 the entity? Select all that apply. (Required)
	<ul style="list-style-type: none"> ➤ Developing and implementing an action plan for addressing forced labour and/or child labour ➤ Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily ➤ Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization’s activities and supply chains ➤ Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour ➤ Developing and implementing child protection policies and processes ➤ Developing and implementing anti-forced labour and/or -child labour contractual clauses ➤ Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists ➤ Developing and implementing grievance mechanisms
2.	Please provide additional information describing the steps taken (if applicable) (1,500 character limit).

- NBCC has formally approved its first Policy on Forced Labour and Child Labour in Supply Chains, demonstrating its strong commitment to ethical procurement and supply chain transparency. This policy outlines specific measures and expectations that will be implemented over the next 12–24 months.
- NBCC has finalized and implemented its Supplier Code of Conduct, which clearly defines expectations related to ethical sourcing, labour standards, and compliance. The Code has been shared with all suppliers and relevant employees to ensure broad awareness and adherence across the institution.
- NBCC has also developed a Strategic and Implementation Plan. This plan outlines specific responsibilities, and monitoring mechanisms to ensure effective execution of the policy commitments.
- NBCC has delivered training sessions to employees involved in procurement to raise awareness about the new policy, the Supplier Code of Conduct, and Bill S-211. Ongoing training will continue to be provided to ensure compliance and embed ethical procurement practices into NBCC’s daily operations.

3. Which of the following accurately describes the entity’s structure? (Required)

- Corporation

4. Which of the following accurately describes the entity’s activities? Select all that apply. (Required)

- Importing into Canada goods produced outside Canada

5. Please provide additional information on the entity’s structure, activities and supply chains (1,500 character limit)

- New Brunswick Community College (the “College”) was established as a post-secondary public education corporation under the authority of the New Brunswick Community Colleges Act effective May 29, 2010. The College is exempt from income tax under section 149 of the Income Tax Act. The College, with campuses located in Fredericton, Miramichi, Moncton, Saint John, St. Andrews and Woodstock, is responsible for enhancing the economic and social wellbeing of the Province of New Brunswick (“Province”) by addressing the occupational training requirements of the population and of the labour market of the Province.

The College is, primarily, a service organization and this is reflected in the fact that approximately 75% of its annual expenses are salaries and benefits. The College’s preliminary review of supply chain activities indicates that it is the ‘importer of record’ for approximately-67 transactions totaling approximately \$ 88, 895 on annual spending of \$139 Million (representing less than 1/10th of a percentage). Having met the additional criteria of 1) having a place of business in Canada as well as 2) at least \$20 Million in assets; 3) at least \$40 Million in revenue and 3) an average of at least 250 employees, NBCC has met the criteria of ‘entity’ prescribed by the Forced Labour and Child Labour in Supply Chains Act (May 11, 2023).

6. Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

- Yes

6.1 If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts

7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500 character limit).

- See attached policy, and supplier code of conduct

8. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)

- Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

8.1	If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Required)
	<ul style="list-style-type: none"> ➤ The types of products it produces, purchases or distributes ➤ Tier one (direct) suppliers
9.	Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Required)
	<ul style="list-style-type: none"> ➤ Retail trade
10.	Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit).
	<ul style="list-style-type: none"> ➤ A very small number of NBCC transactions include the import and purchase of goods having a country of origin considered to be of high risk. NBCC will be reviewing its preliminary results in detail and monitoring such transactions on an annual basis for potential mitigation.
11.	Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)
	<ul style="list-style-type: none"> ➤ Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.
11.1	If yes, which remediation measures has the entity taken? Select all that apply. (Required)
	<ul style="list-style-type: none"> ➤ Not applicable
12.	Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).
	<ul style="list-style-type: none"> ➤ Not applicable
13.	Has the entity taken any measures 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 its activities and supply chains? (Required)
	<ul style="list-style-type: none"> ➤ Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.
14.	Please provide additional information on any measures the entity has 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 its activities and supply chains (if applicable) (1,500 character limit).
	<ul style="list-style-type: none"> ➤ Not applicable
15.	Does the entity currently provide training to employees on forced labour and/or child labour? (Required)
	<ul style="list-style-type: none"> ➤ No
15.1	If yes, is the training mandatory? (Required)
	<ul style="list-style-type: none"> ➤ Not applicable
16.	Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit).

- NBCC has delivered training sessions to employees involved in procurement to raise awareness about the new policy, the Supplier Code of Conduct, and Bill S-211. Ongoing training will continue to be provided to ensure compliance and embed ethical procurement practices into NBCC's daily operations.

17. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Required)

- Yes

17.1 If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Required)

- Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses

18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).

- As outlined in policy, NBCC has committed to relevant performance measures such as supply chain activity e.g. imports from countries of origin having a high risk; compliance with policy; completion of training required under this policy; semi-annual audits of employee records, etc.

Forced Labour and Child Labour in Supply Chains

Policy Number:	2401
Key Process Area:	Procurement
Owner:	VP FA
Current Approved Date:	June 13, 2024

POLICY STATEMENT

NBCC values leadership with integrity and demonstrates that by taking pride in its collective accountability. All Employees are expected to be accountable for their actions and must exercise due diligence in the procurement of goods (and/or services) for which there is a risk of forced labour and child labour within the relevant supply chain so as to promote public confidence and trust in the College.

PURPOSE

NBCC acknowledges the risk that a supply chain may involve the use of unknown members of its supply chain reliant on forced labour and/or child labour.

This policy outlines NBCC's commitment to accountability and provides guidance regarding how the College will demonstrate its commitment to combat forced labour and child labour within its supply chains. More specifically this policy outlines scope of applicability, relevant definitions, as well as measures proposed to combat forced labour and child labour within NBCC's supply chains.

SCOPE AND LIMITATIONS

This policy applies to NBCC Employees and Partners. Compliance with this policy is a condition of employment as well as eligibility for partnership with the institution.

1.0 DEFINITIONS

Child labour

as defined by Fighting Against Forced Labour and Child Labour in Supply Chains Act (May 11, 2023), means labour or services provided or offered to be provided by persons under the age of 18 years and that

- (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- (c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
- (d) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999.

College Community Members

any person who studies, teaches, conducts research, or works at or under the auspices of the College, including, but not limited to:

- any person who is an employee of the College;

- Students of the College;
- Visiting Scholars, and any other persons while they are acting on behalf of or at the request of the College; and
- a contractor engaged by the College.

Employee

a person who meets the definition of employee under the Public Service Labour Relations Act.

Forced labour

as defined by Fighting Against Forced Labour and Child Labour in Supply Chains Act (May 11, 2023), labour or service provided or offered to be provided by a person under circumstances that

(a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or

(b) constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930.

Partner

including but not limited to visiting scholars, volunteers, contractors, fee-for-service individuals, clients of NBCC, and any other persons while they are acting on behalf of or at the request of the College.

Underage individual

any person who has not reached the minimum legal working age in New Brunswick, currently indicated at 16 years of age.

2.0 IMPLEMENTATION

2.1 Measures to combat Forced Labour and Child Labour

- 2.1.1 Supply chains need to be continually evaluated in accordance with NBCC's Enterprise Risk Management Framework against the risk of Forced Labour and Child Labour and mitigation activities put in place to minimize that risk.
- 2.1.2 Suppliers and/or supply chains representing risk of Forced Labour and Child Labour shall be reviewed by NBCC.
- 2.1.3 Process shall be put in place to ensure appropriate due diligence is carried out in relation to forced Forced Labour and Child Labour which may include evaluating human rights in a sector or country, the type of sector in which a service provider operates, the countries from which services are provided, the nature of relationships with suppliers, and the complexity of supply chain(s).
- 2.1.4 NBCC's standard procurement and contract policies, procedures and documentation shall address Forced Labour and Child Labour as part of due diligence conducted prior to entering into business relationships as well as any reviews, renewals and/or continuation of existing business relationships currently in place.
- 2.1.5 NBCC shall develop or otherwise procure training for employees (including but not limited to Finance department employees) participating in College procurement activity with regard to Forced Labour and

Child Labour. This training shall be completed on a timely basis in order to conduct procurement activity on behalf of the College.

2.2 Measures to combat the employment of underaged individuals

- 2.2.1 During the application and pre-screening phase of the application and selection process, the candidate will be required to confirm that they are over the age of 16.
- 2.2.2 NBCC's employment documents shall include a mandatory section where applicants must provide proof of their date of birth. Acceptable documents include, but are not limited to, birth certificates, passports, or government-issued identification.
- 2.2.3 NBCC's People and Culture division will conduct semi-annual audits of employee records to ensure compliance with age-related employment laws. These will be conducted in conjunction with random audits to further ensure compliance and deter any potential violations.
- 2.2.4 NBCC will maintain accurate and up-to-date records of all age verification documents in a secure and confidential manner, in accordance with NBCC's retention schedule.

3.0 REPORTING

NBCC College Community Members including Employees or Partners may raise any concerns about the College's role in combatting Forced Labour and/or Child Labour in the manner prescribed by NBCC's [Protected Disclosure \(4140\)](#) policy.

4.0 INTERPRETATION

Questions or concerns about the interpretation or application of this policy and/or related procedures may be directed to the Director of Finance or Vice President Finance and Administration.

5.0 OTHER RELATED DOCUMENTS

Document Name (xxxx.xxxx)

Document Name (xxxx.xxxx)

Supplier Code of Conduct (SCC) Guidelines

Overview

NBCC is committed to promoting responsible, ethical, and sustainable procurement. To support this, vendors are expected to acknowledge and comply with NBCC’s Supplier Code of Conduct (SCC). This aligns with Canadian regulations such as Bill S-211 and NBCC’s broader values of ethical sourcing and social responsibility. The SCC applies to all procurement activities, whether conducted within Canada or internationally. Initially required for purchases over \$5,000 (goods) and \$10,000 (services), this process will gradually extend to all procurement, including RFPs and Tenders.

Key Benefits

- Regulatory Alignment – Helps NBCC comply with the Forced and Child Labour in Supply Chains Act (Bill S-211)
- Supports Ethical Sourcing – Encourages vendors to maintain safe, fair, and sustainable business practices
- Enhances Transparency – Ensures clear records of vendor compliance and risk mitigation
- Facilitates Audit Readiness – Enables documentation for both internal and external reviews
- Promotes NBCC Values – Reinforces NBCC’s mission of accountability, respect, and inclusion

General Guidelines

- Vendors are expected to acknowledge the SCC before procurement is finalized
- SCC is currently required for procurements above \$5,000 (goods) and \$10,000 (services)
- Over time, SCC will apply to all transactions, regardless of value
- SCC should be shared with vendors and returned with an acknowledgment signature
- Applies to vendors based within Canada and internationally

Process for Collection

Role	Responsibility
Requesting Department	Share SCC with vendor, collect signed acknowledgment, and email it to P2P@nbcc.ca with EPR number
Vendor	Sign and return the SCC or provide written reason if unable to comply to Requesting Department
P2P Team	Update SCC Tracker and file document in the shared folder

If SCC Is Not Submitted

- If a vendor does not return the SCC, the department should follow up at least twice
- If vendor refuses, a written explanation should be provided and attached to the EPR
- Procurement can proceed only if a valid justification is approved (e.g. Sole source, emergency purchase)
- All exceptions should be reviewed by Procurement and recorded in the SCC Tracker

In Case of Non-Compliance

- Temporary suspension from the supplier list
- Notification to Procurement team and Director of Finance
- Possible exclusion from future tenders or RFPs

Ongoing Review and Audit

- P2P team conducts quarterly reviews of the SCC Tracker
- Annual compliance checks across vendors
- Any updates to the SCC form will be circulated to vendors

References

- [NBCC Supplier Code of Conduct.pdf](#)
- Bill S-211 – Forced and Child Labour in Supply Chains- [Forced Labour in Canadian Supply Chains](#)
- Forced Labour and Child Labour in Supply Chains Policy Number: 2401
- [Supplier Code of Conduct - Submission Tracker.xlsx](#)

Step by Step Workflow

