

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

---

Issued May 2025  
For the fiscal year ending March 31, 2025

## Identifying Information

|                                                                |                                  |
|----------------------------------------------------------------|----------------------------------|
| Reporting entity's legal name:                                 | Grant MacEwan University         |
| Financial reporting year                                       | April 1, 2024 to March 31, 2025  |
| Identification of a revised report                             | n/a                              |
| Business number                                                | 107448219                        |
| 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                                                       | Edmonton, Alberta, Canada        |

## About MacEwan University

Grant MacEwan University is a board-governed, public post-secondary institution operating in Alberta as an Undergraduate University under the authority of the Post Secondary Learning Act. Established in 1971, the institution has a rich history in its growth from a community college. The university was officially named Grant MacEwan University by an Order in Council in 2009 and was rebranded MacEwan University for communications and marketing purposes in 2013. This report will hereafter refer to the university as “MacEwan University”.

MacEwan University is a young university with a rich past. The university inspires students with a powerful combination of academic excellence and personal learning experiences. Through learner-centered teaching, we connect with our students – creating a unique post-secondary experience that opens up diverse pathways for achievement and growth.

The university provides a transformative education in a collaborative and supportive learning environment. Creativity thrives here—through research and innovation that engages students, faculty and the community.

We are focused on our students – 19,000 – providing them with choices and opportunities for success with a mix of undergraduate degrees, certificates, diplomas and degree-transfer programs.

MacEwan University’s strategic framework, [Teaching Greatness: Strategic Vision 2030](#), incorporates concepts of motion and change and embodies MacEwan’s history. The vision is bold and aspirational, and it is about redoubling our emphasis on exceptional undergraduate teaching.

In this report, we outline information as required under sections 11(1) and 11(3) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). More specifically, we describe the steps taken during the previous financial year to prevent and reduce the risk that forced labour and child labour is used at any step of the importation of goods into Canada by MacEwan and discuss future remediation efforts.

## Steps taken to prevent and reduce risks of forced labour and child labour

With respect to subsection 11(1) of the Act, MacEwan University is taking steps to reduce risks and will continue to develop such steps in the coming years:

1. The university has policies in place that govern the behaviour of employees and its Board of Governors. These include:
  - Codes of Conduct for [employees](#) and [Board of Governors members](#),
  - [Safe Disclosure](#) policy and procedures,
  - [Sustainability](#) policy, and
  - [Procurement of Goods and Services](#) policy.

2. The university's key tier-one suppliers in large-spend and potential high-risk categories of food and beverages, furniture, computer equipment, and books and apparel are required to provide us with attestations and/or links to their supplier code of conduct and/or forced labour and child labour policies.
3. Any respondent participating in our competitive bids must attest that it has policies, processes, and a governance structure designed to reduce and prevent the risk that forced labour or and 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 respondent or the respondent's suppliers.
4. The university undertakes an annual internal assessment of the risks of forced labour and child labour in its activities, that provides a basis upon which ongoing assessments and activities are built.
5. The university requires all its procurement and contracts personnel to undergo comprehensive third-party forced and child labor training, and obtain the annual certification.

### **Supplementary information**

As per subsection 11(3) of the Act, the following categories of supplementary information are provided:

#### **a) Structure, activities, and supply chains**

The university operates under a shared governance structure between the Board of Governors (Board) and the General Faculties Council (GFC). The university's culture is reflected in shared governance, which includes considerable engagement and respect for a variety of viewpoints. The trademarks of university decision-making are collaboration, consultation, and cooperation.

Under bicameral governance, the Board has senior oversight of the institution and concerns itself with long-range planning and business affairs. The Board manages and operates the university within its approved mandate, oversees the efficient and effective use of financial and human resources to meet institutional objectives and ensures that institutional risk is appropriately managed.

The GFC, MacEwan University's senior academic governance body, is responsible for the academic affairs of the university such as academic programming and curriculum, academic standards, research and creative activities, academic policies and awards.

MacEwan has a well-defined organizational structure that supports its academic and administrative functions. There are approximately 2,900 full and part-time employees working at the university including sessional appointments; all employees work in Canada and are subject to Canadian labour laws.

MacEwan's core business activities are:

- delivering exceptional undergraduate learning, maximizing flexibility to meet students where they are, and preparing MacEwan graduates who are versatile and future-ready through a wider array of experiential learning opportunities, and strategic relationships in the community,
- creating scholarly excellence (advancing research and development initiatives) and engaging learners in scholarships as part of the well-rounded MacEwan experience, and
- engaging with our community.

In addition to these core activities, the university operates a residence for students, on-campus food services, and the MacEwan Bookstore which offers textbooks and course materials, school and art supplies, technology, and a selection of promotional merchandise and apparel.

### **Supply chain activities related to the importation of goods:**

MacEwan 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:

- goods and services required for university operations (e.g., information technology, office supplies, lab equipment, facilities management),
- bookstore sale of goods (e.g., textbooks and course materials, school and art supplies, technology, promotional merchandise, and apparel),
- athletics (e.g., apparel, equipment, and supplies for sports teams),
- student supplies (e.g., lab supplies, classroom supplies, art supplies),
- acquisition of goods for research (e.g. lab supplies, chemicals, and equipment),
- residence providing accommodation to students, and
- on-campus food and beverage services.

The university's spending on the above goods for the fiscal year ending March 31, 2025, is approximately \$30.0M. Of this amount, \$27.3M (91.0%) is sourced from Canadian suppliers, \$2.6M (8.7%) is sourced from US suppliers, and \$0.05M (0.2%) is sourced from suppliers located in France and Great Britain. None of these suppliers are located in at-risk countries.

None of our tier-one suppliers are located in at-risk countries. Future initiatives include working to enhance the university's visibility of suppliers below tier one, to the extent possible. If any indirect suppliers from at-risk countries are identified, they will then be reviewed for their risks of forced labour and child labour.

## **b) Policies and due diligence processes**

MacEwan has policies and responsible business conduct practices which govern our activities. These include:

- The university's Codes of Conduct for [employees](#) and [Board of Governors members](#):
  - All employees are expected to act in a way that reflects the place they hold in the public sphere and to maintain the trust and regard expected of the employees of a publicly assisted undergraduate university.
  - Board of Governors members bear a fiduciary responsibility and are expected to act in the best interests of the university. Although members bring special expertise and points of view to the Board's deliberations, the best interests of the university remain paramount in all Board activities. Members must be conscientious in contributing to and helping the Board fulfill its responsibilities for guiding the university, in defining its mission, planning and goal setting, protecting and furthering its assets, and being responsible for the ethical conduct of its affairs.
- The university's [Safe Disclosure](#) policy and procedures:
  - The university maintains high standards of legal, fiscal and ethical behaviour and fosters a culture of ethics and compliance by encouraging members of the university community to report suspected or actual wrongful conduct, taking appropriate action to investigate reports of wrongful conduct, and protecting members of the university community from reprisal for making such reports.
- The university's [Sustainability](#) policy:
  - MacEwan University is committed to the principle of sustainability in all its operations and to the recognition of the fundamental interdependence of environmental quality, economic prosperity, and social responsibility.
- The university's [Procurement of Goods and Services](#) policy:
  - The university relies on this policy and related procedures to govern our procurement activities. Currently, MacEwan University does not have a policy directly referencing forced labour and child labour.

### **Additional due diligence processes implemented in relation to forced labour and child labour in the current reporting year:**

- MacEwan University requires any respondent participating in our competitive bids to attest that it has policies, processes, and governance structure designed to reduce and prevent the risk that forced labour and 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 respondent or the respondent's suppliers. Further, it

must attest that the goods and services provided by the respondent under existing Agreements are not the result of, and in no way involve, forced labour and child labour (as such terms are defined in *Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act*).

- The university undertakes an annual internal assessment of the risks of forced labour and child labour in its activities, that provides a basis upon which ongoing assessments and activities are built. This assessment has identified the potential high-risk categories of food and beverages, furniture, computer equipment, and books and apparel. All active large-spend, key suppliers of those commodities are required to provide attestations and/or links to their supplier code of conduct and/or forced labour and child labour policies.
- Third-party training is in place, and will continue annually, for all employees in the procurement and contract management department.

### **Future initiatives:**

MacEwan is committed to focus its efforts on the following areas to comply with the Act:

- Incorporating awareness-raising activities for all employees, including creating training on forced labour and child labour that will be available on the university's website,
- assessing whether contract templates require editing in order to incorporate anti-forced and anti-child labour clauses,
- working to enhance its visibility of suppliers below tier one, to the extent possible. If any indirect suppliers from at-risk countries are identified, they will be reviewed for their risks of forced labour and child labour,
- updating existing policies and procedures to ensure they align with those in the Act's requirements, and
- implementing a Supplier Code of Conduct that reflects the new legislation.

### **c) Forced labour and child labour risks**

The university determines its risks through assessments that are completed annually and include:

- A review of all spending in inventory, cost of goods sold, capital assets, and certain expense categories. This assessment also includes the suppliers' source country, and ascertains whether any suppliers are located in high-risk countries (as determined by [unicef.org](https://www.unicef.org)).
  - **Finding:** The assessment determined that the university's tier-one suppliers are located in Canada, US, France, and Great Britain, none of which are at-risk countries.

- A review of spending by commodity type. This assessment includes all commodities, and ascertains whether they are likely to be produced in high-risk countries (as determined by the [Government of Canada's Child Labour site](#), and the US Department of Labor's [List of Goods Produced by Child Labor or Forced Labor](#)).
- **Finding:** The assessment determined that the following categories are potential contributors to risk: food and beverages, furniture, computer equipment, and bookstore textbooks and apparel. Our large-spend and potential high-risk tier-one suppliers of those categories are required to provide us with attestations and/or links to their supplier code of conduct and/or forced labour and child labour policies.

For those potential high-risk categories, the university is working to enhance its visibility into suppliers further down tier one, to the extent possible. If any indirect suppliers from at-risk countries are identified, they will then be reviewed for their risks of forced labour and child labour.

#### **d) Remediation measures**

Further analysis is required as noted in Item C, to determine what, if any, remediation may be required. No measures have been taken in the reporting year.

#### **e) Remediation of loss of income**

Further analysis is required as noted in Item C, to determine what, if any, remediation may be required. No measures have been taken in the reporting year.

#### **f) Training**

Procurement training at MacEwan is an ongoing activity. The university requires all its procurement and contracts personnel to undergo comprehensive third-party forced and child labor training and obtain the annual certification. This course covers tools to champion ethical labour practices, from understanding the definitions of forced and child labour to navigating the complexities of Bill S-211. The course includes an introduction to forced and child labour training, a brief history of labour laws in Canada, Bill S-211 reporting, forced and child labour penalties and enforcement, steps for forced and child labour compliance, and fulfilling reporting obligations. All procurement and contract personnel have been certified in 2024; certifications are saved centrally.

The university is currently creating a training document on the requirements of the Act, that will be available to all employees, on its website.

**g) Assessment of effectiveness**

Detailed assessments have not been taken in the reporting year. MacEwan will implement the steps noted in “Future Initiatives” in this report, evaluate the efficacy of those efforts in preventing and mitigating the risks of forced labor and child labor, and develop measurements (KPIs) on the procedures.

**Approval and attestation**

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), and in particular section 11 thereof, I, in the capacity of [title], attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.

Carolyn Graham  
Chair, Grant MacEwan University Board of Governors

May 29, 2025

\_\_\_\_\_  
Date



\_\_\_\_\_  
Signature

I have the authority to bind Grant MacEwan University