



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

**Annual Compliance Report
April 1, 2024 – March 31, 2025**



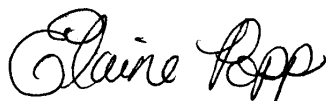
Preamble

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Bill S-211), this report is submitted as part of our organization's annual compliance requirements. The purpose of this report is to outline the measures that Durham College has taken during the preceding financial year to prevent and reduce the risk of forced labour and child labour within our supply chains and business operations.

Durham College acknowledges the critical importance of upholding human rights and promoting ethical labour practices across all tiers of our value chain. We are committed to transparency, accountability, and continuous improvement in identifying, assessing, and addressing risks related to forced and child labour. This report reflects our ongoing efforts to align our operations with both Canadian legislative expectations and international human rights standards.

Durham College engages in extensive procurement activities, adhering to public procurement regulations and ethical sourcing practices. As such, Durham College has updated its competitive procurement templates and standard contract language to require suppliers/vendors bidding to attest that their goods and services are not the result of, and in no way involve, forced labour or child labour.

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.



Dr. Elaine Popp
Durham College President
Dated at Oshawa, Ontario on May 7, 2025

I have the authority to bind Durham College.

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? (Mandatory)

- Mapping activities
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- 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
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

4. Please provide additional information describing the steps taken (if applicable) (3,000 character limit).

- We compiled a comprehensive list of all suppliers from whom we directly purchase goods outside of Canada and reviewed this for potential risks related to forced and child labour. No risks were identified.
- All new suppliers are now required to formally confirm their commitment to ethical sourcing practices, with a specific focus on preventing forced and child labour. We've implemented a process to collect written attestations from these suppliers, confirming that they do not engage in or support such practices in any part of their operations or supply chains.
- We have actively collaborated with industry peers including other universities and relevant associations to share best practices, take part in ethical sourcing initiatives, and contribute to working groups focused on preventing forced and child labour in supply chains.
- We updated the College's procurement policies and procedures to directly address the risks of forced and child labour in the supply chain. Ethical sourcing requirements are now built into every stage of the procurement process from evaluating and selecting suppliers to managing contracts to help ensure our purchasing practices support responsible and ethical standards.

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

- Yes

5.1 If yes, which elements of the policies and/or due diligence process has the entity implemented in relation to forced labour and/or child labour? (Mandatory)

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing potential and actual adverse impacts in operations, supply chains and business relationships
- Tracking implementation and results

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

- Yes, we have identified parts of our activities and/or supply chains that carry risks to the best of our knowledge and will continue to identify emerging risks.

6.1 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. (Mandatory)

- The sector or industry it operates in
- The types of products it produces or imports
- The locations of its activities, operations or factories
- The types of products it sources
- The raw materials or commodities used in its supply chains
- Tier one (direct) suppliers
- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour
- The use of forced labour
- The use of child labour
- None of the above

7. 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. (Mandatory)

- Agriculture, forestry, fishing and hunting
 - Crop production
 - Animal production and aquaculture
 - Forestry and logging
 - Fishing, hunting and trapping
 - Support activities for agriculture and forestry
- Mining, quarrying, oil and gas extraction
 - Oil and gas extraction
 - Mining and quarrying (except oil and gas)
 - Support activities for mining, and oil and gas extraction
- Utilities
- Construction
 - Construction of buildings
 - Heavy and civil engineering construction
 - Specialty trade contractors
- Manufacturing
 - Food manufacturing
 - Beverage and tobacco product manufacturing
 - Textile mills
 - Textile product mills
 - Apparel manufacturing
 - Leather and allied product manufacturing
 - Wood product manufacturing
 - Paper manufacturing
 - Printing and related support activities
 - Petroleum and coal product manufacturing

- Chemical manufacturing
- Plastics and rubber products manufacturing
- Non-metallic mineral product manufacturing
- Primary metal manufacturing
- Fabricated metal product manufacturing
- Machinery manufacturing
- Computer and electronic product manufacturing
- Electrical equipment, appliance and component manufacturing
- Transportation equipment manufacturing
- Furniture and related product manufacturing
- Other manufacturing
- Wholesale trade
 - Farm product merchant wholesalers
 - Petroleum, petroleum products, and other hydrocarbons merchant wholesalers
 - Food, beverage and tobacco merchant wholesalers
 - Personal and household goods merchant wholesalers
 - Motor vehicle and motor vehicle parts and accessories merchant wholesalers
 - Building material and suppliers merchant wholesalers
 - Machinery, equipment and supplies merchant wholesalers
 - Business-to-business electronic markets, and agents and brokers
 - Other merchant wholesalers
- Retail trade
 - Motor vehicle and parts dealers
 - Building material and garden equipment and supplies dealers
 - Food and beverage retailers
 - Furniture, home furnishings, electronics and appliances retailers
 - General merchandise retailers

- Health and personal care retailers
- Gasoline stations and fuel vendors
- Clothing, clothing accessories, shoes, jewelry, luggage and leather goods retailers
- Sporting goods, hobby, musical instrument, book, and other retailers
- Transportation and warehousing
 - Air transportation
 - Rail transportation
 - Water transportation
 - Truck transportation
 - Transit and ground passenger transportation
 - Pipeline transportation
 - Scenic and sightseeing transportation
 - Support activities for transportation
 - Postal service
 - Couriers and messengers
 - Warehousing and storage
- Information and cultural industries
 - Motion picture and sound recording industries
 - Publishing industries
 - Broadcasting and content providers
 - Telecommunications
 - Computing infrastructure providers, data processing, web hosting, and related services
 - Web search portals, libraries, archives, and all other information services
- Finance and insurance
 - Monetary authorities - central bank
 - Credit intermediation and related activities

- Securities, commodity contracts, and other financial investment and related activities
 - Insurance carriers and related activities
 - Funds and other financial vehicles
- Real estate and rental and leasing
 - Real estate
 - Rental and leasing services
 - Lessors of non-financial intangible assets (except copyrighted works)
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
 - Administrative and support services
 - Waste management and remediation services
- Educational services
- Health care and social assistance
 - Ambulatory health care services
 - Hospitals
 - Nursing and residential care facilities
 - Social assistance
- Arts, entertainment and recreation
 - Performing arts, spectator sports and related industries
 - Heritage institutions
 - Amusement, gambling and recreation industries
- Accommodation and food services
 - Accommodation services
 - Food services and drinking places
- Other services (except public administration)
 - Repair and maintenance
 - Personal and laundry services

- Religious, grant-making, civic, and professional and similar organizations
- Private households
- Public administration
 - Federal government public administration
 - Provincial and territorial public administration
 - Local, municipal and regional public administration
 - Indigenous public administration
 - International and other extra-territorial public administration
- None of the above
- Other, please specify

8. 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) (3,000 character limit).

After a thorough review of our operations and supply chains, no areas were identified as carrying a risk of forced labour or child labour. We remain committed to ethical sourcing and fair labour practices and will continue to monitor our activities to ensure compliance with all applicable labour standards.

9. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Mandatory)

- Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

10. Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Mandatory)

- 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.

11. Does the entity currently provide training to employees on forced labour and/or child labour? (Mandatory)

- No

12. 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? (Mandatory)

- Yes

12.1 If yes, what method does the entity use to assess its effectiveness? (Mandatory)

- Setting up a regular review or audit of the entity's policies and procedures related to forced labour and child labour