

ANNUAL REPORT ON FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

PURPOSE

This annual report for the 2024-2025 fiscal year has been created by Mohawk College of Applied Arts and Technology ("**Mohawk College**") for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the "**Act**").

OUR COMMITMENT

Mohawk College is committed to preventing and reducing the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, including goods that Mohawk College imports into Canada.

CATEGORIZATION AND SECTOR

Categorization

Mohawk College is an entity under the Act.

The Act applies to Mohawk College as, in at least one of its two most recent financial years, Mohawk had:

- (1) at least \$20 million in assets for at least one of its two most recent financial years,
- (2) generated at least \$40 million in revenue for at least one of its two most recent financial years, and
- (3) employed an average of at least 250 employees.

Sector

Mohawk College is a public college of applied arts and technology and is one of 24 public colleges in Ontario operating in the educational services sector.

STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Structure and Activities

Mohawk is a publicly funded Crown agency that administers post-secondary and continuing education and apprenticeship programs. Mohawk College is focused on meeting the workforce needs of its community and province. With four campuses in Hamilton and a satellite campus in Mississauga providing programs in partnership with triOS College, Mohawk College offers more than 200 programs in areas such as health care, aviation, business, community and social services, engineering, and technology, and is one of the largest trainers of skilled trades and apprentices in Ontario.

Mohawk College imports minimal goods produced outside of Canada. Additionally, Mohawk College sells goods both inside and outside of Canada through its retail campus store. The retail campus store mainly sells learning materials and textbooks (which include both hard copy and digital materials), Mohawk College branded apparel and clothing, giftware, and various course supplies for students. The vast majority of goods sold from the retail campus store are provided to customers within Canada.

Supply Chain

Mohawk College sources goods which include academic tools and equipment such as lab equipment, instructional supplies (materials, small equipment, and software licenses), information technology, building maintenance supplies, construction materials, and office supplies. Mohawk College is involved in the importing of goods on a minimal basis, the vast majority of the goods sourced by Mohawk College are purchased from suppliers in Canada.

Steps Taken by Mohawk College in 2024-2025

Mohawk College has increased monitoring measures to prevent and reduce the risk of forced labour and child labour used in our activities and supply chains by implementing a centralized layer of review by Procurement Services on all requisitions.

Mohawk College proactively engages our customs broker in providing monthly data related to the import of all goods. This data is used to produce quarterly reports highlighting country of origin and all imported goods for risk of forced labour and child labour as well as compliance with the Building Ontario Businesses Initiative Act, 2022. Data is benchmarked to ensure Mohawk College is not increasing purchasing volume outside Canada.

Mohawk College continues to collaborate with industry peers by engaging with other post-secondary institutions and relevant industry associations to share best practices, collaborate on ethical sourcing initiatives, participate in industry working groups or forums dedicated to addressing issues related to forced labour and child labour.

POLICIES AND DUE DILIGENCE PROCESSES

Mohawk College's Policies and Processes

In 2024-2025, Mohawk College maintained several policies and processes which affirm its commitment to abiding by applicable forced labour and child labour laws, including:

- a) Mohawk College abides by the Broader Public Sector Procurement Directive (Ontario), including its Supply Chain Code of Ethics. The Supply Chain Code of Ethics affirms Mohawk College's commitment to work continuously to improve its supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share leading practices to ensure an ethical, professional, and accountable supply chain.

- b) Mohawk College's Procurement Policy includes a section on "Supplier Code of Conduct" which puts an obligation on the supplier to comply with all applicable laws both domestic and international.
- c) Mohawk College's Whistle Blowing Policy provides a mechanism for members of the Mohawk College community to confidentially report serious wrongdoings or violations of law. It applies to all students, employees, workers, volunteers, agents, vendors, subcontractors, contractors, or any company providing a product or service to Mohawk, including suppliers.
- d) Mohawk College leverages existing vendor of record agreements with various group purchasing organizations such as Ontario Education Collaborative Marketplace (OECM) and Supply Ontario, which require its suppliers to adhere to ethical procurement practices;
 - i. OECM Suppliers must comply with OECM's Supplier Code of Conduct which requires them to abide by applicable labour and human rights legislation; No individuals shall be employed under the age of 15 or below the legal age for completing compulsory education in the country of manufacture, whichever is higher. Workers under the age of 18 shall not be assigned tasks that could endanger their health and safety. Child labour will not be accepted. All work shall be voluntary, free from forced labour, including indentured labour, prison labour, bonded labour, or other forms of forced labour. Workers shall be free to leave upon reasonable notice.
 - ii. Supply Ontario Suppliers must comply with the Code of Conduct for Procurement (the "Code"). As part of this Code suppliers are expected to respect their workers' workplace rights, and take steps to mitigate human trafficking risks and monitor compliance of labour and human rights in their supply chain.
- e) Mohawk College's Request for Proposal ("RFP") process is used by those who wish to submit work proposals. Pursuant to the RFP process, Mohawk College reserves the right to suspend a supplier from participating in its procurement process for prescribed periods if they engage in illegal or unethical conduct.
- f) All purchases are subject to Mohawk College's Purchase Order ("PO") Terms and Conditions where no separate written agreement exists. By accepting the PO, the Supplier and any subcontractors shall comply with all applicable federal, provincial and municipal statutes, regulations and by-laws pertaining to the goods and/or services or that govern Mohawk College's distribution of the Supplier's goods as, or as part of, a College product.
- g) Prior to issuing a Purchase Order, suppliers working on Mohawk College property are confirmed to be in "good standing" with the Workplace Safety and Insurance Board ("WSIB") through the WSIB

online services portal. WSIB provides employees with the right to refuse unsafe work.

- h) Mohawk College's "applicant workflow" program used in its hiring process requires applicants to confirm that they are legally allowed to work in Canada and to provide government issued photo identification. These safeguards help to identify workers and verify that no workers are under Ontario's legal working age.
- i) Students employed by Mohawk College are compensated based on the OPSEU collective agreement.
- j) A requirement for all Facility Service trade contractors at Mohawk College to be licensed to work in Ontario. This helps to reduce the risk of child labour as there are minimum age requirements to obtain a trade license in Ontario.

FORCED LABOUR AND CHILD LABOUR RISKS

Mohawk College has started the process of identifying risks of forced labour and child labour that may exist in its supply chain. It is aware that there may be higher risks associated with certain regions, goods, and industries.

REMEDIATION MEASURES

Mohawk College has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

REMEDIATION OF LOSS OF INCOME

Mohawk College has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, it has not undertaken any income remediation measures.

TRAINING PROVIDED TO EMPLOYEES

In 2024-2025, employees within the Procurement Department received training specific to forced labour or child labour. Procurement policy training is available on an as needed basis and at the request of departments.

ASSESSING EFFECTIVENESS

Mohawk College does not currently have specific policies and procedures in place to assess its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its supply chain. However, it will be considering what methods of assessment may be appropriate in the future. Notwithstanding, as outlined above, the Purchase Order and RFP process, applicant workflow program, Facility Service and WSIB requirements as well as the Broader Public Sector Procurement Directive compliance and utilization of group purchasing organization reduces the risk that child labour and/or forced labour is present in

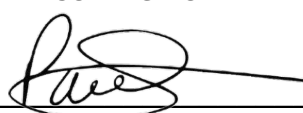
Mohawk College's activities and supply chain.

APPROVAL AND ATTESTATION

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 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.

IN WITNESS WHEREOF the authorized signing officer(s) of Mohawk College have executed this report as of the effective date of the signatures set out below.

SIGNED

_____) **MOHAWK COLLEGE OF APPLIED ARTS AND TECHNOLOGY**
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) Per: 
)
Date: April 16, 2025) Name: Paul Armstrong
) Title: President
I have authority to bind Mohawk College of Applied Arts and Technology