



Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”)

**Annual Report for Fiscal Year Ended
March 31, 2025**

Introduction

This statement is being filed with respect to the activities of The University of Winnipeg and the following organizations controlled by the University of Winnipeg: The University of Winnipeg Foundation, The University of Winnipeg Community Renewal Corporation and 7049651 Manitoba Association Inc.

This report is being filed as a joint report for the above-named entities, in accordance with section 11(2) of the Act. Jointly, this group will be referred to as the “University” or “we”.

The University is governed by its Board of Regents who are responsible for determining the overall policies, strategic direction and goals and objectives.

Structure, Activities and Supply Chains

Structure – Reporting Entities:

The University is comprised of the following entities located in Winnipeg, Manitoba:

The University of Winnipeg (the “UW”) is a not-for-profit organization that operates under the authority of the *University of Winnipeg Act* of the Province of Manitoba. The primary role of the UW is to provide post-secondary educational, research, and community services. The UW also operates the Collegiate, an independent high school, as well as several other education-related activities.

The University of Winnipeg Foundation (the “Foundation”) is a corporation without share capital that is a not-for-profit registered charitable organization. The Foundation was established in 2002 by the Board of Regents of the UW for the intended purpose of acting as a fundraising body for the benefit of the UW. The Foundation receives funding and support from the UW and exists for the sole purpose of supporting the UW.

The University of Winnipeg Community Renewal Corporation (“UWCRC”) is a corporation without share capital that is a non-charitable, not-for-profit organization. UWCRC was incorporated in 2005, with a mandate to support the UW by developing a sustainable university campus and community that promotes the attractiveness to the faculty, staff, students and the greater community. UWCRC is involved in creating, owning and/or managing several non-academic business units at the UW.

7049651 Manitoba Association Inc. (“Downtown Commons”) is a corporation without share capital that is a non-charitable, not-for-profit organization. Downtown Commons was incorporated in 2014 with a mandate to supply long-term residential accommodation to low and moderate income households, including the provision of housing on a rent-geared-to-income basis. A number of units have also been established for use by UW's students. The Downtown Commons is a controlled entity of UWCRC.

Activities and Supply Chain:

The University procures material from established suppliers and vendors to support the provision of educational and supporting services. Goods are primarily procured from suppliers within Canada. In relation to the purposes of the Act, the University imported a small percentage of supplies (valued at less than 2.4% of total expenditures on supplies) into Canada for the year-ended March 31, 2025. Approximately 82% of these imported items were sourced from suppliers located in Europe, the United States, and Australia.

Policies and Due Diligence Processes

The University recognizes our responsibility to protect and respect the human rights of all people who support our university community. Our Mission Statement espouses that our primary responsibility is to our students, to whom we strive to offer a community which appreciates, fosters, and promotes values of human dignity, equality, nondiscrimination, and appreciation of diversity. We are committed to promoting and protecting human rights in the countries from which we import our supplies. We expect that our suppliers uphold the same commitment to fighting against forced labour and child labour in their own supply chains.

Our suppliers are critical collaborators in delivering our educational services and we strive to work with partners who are aligned with our values and commitments. All suppliers are expected to adhere to the University's standard purchase order terms and conditions. These terms and conditions are contractually binding and require suppliers to comply with all applicable International, Federal, Provincial and local laws, orders and regulations, which in any way, directly or indirectly, affect the price, production, sale or delivery of purchased goods or services. This includes compliance with forced labour and child labour laws. The University reserves the right to terminate any agreement with any supplier that cannot demonstrate compliance with the terms and conditions.

The University's Sustainability Policy seeks, in part, to ensure that all procurement decisions consider the environmental and social impacts on society by making purchases from local or national sources and from entities committed to social values, reducing the demand for goods, minimizing the toxicity of goods and services, and purchasing environmentally preferable goods and services. As a part of this policy, the University adheres to fair trade concepts for purchases of products that may be subject to less than fair wages for workers.

Our Conflict of Interest Policy provides the standards for ethical behaviour for our employees to ensure a high standard of professional integrity, ethics and impartiality to maintain the public trust in the University and to protect the integrity for all working and associated with the University. The University also maintains a Protected Disclosure policy which establishes processes to facilitate the disclosure and investigation of significant and serious matters that are potentially unlawful, dangerous to any person, or injurious to the interests of the University, including matters of forced labour or child labour. The policy provides protection to any employee of the University who wishes to come forward and make a disclosure, in good faith, of wrongdoing as defined under the Public Interest Disclosure (Whistleblower Protection) Act and this policy.

Parts of Supply Chain that Carry a Risk of Forced Labour or Child Labour and Steps Taken to Assess and Manage that Risk

The University analyzes and reviews its supply chain for its importing activity, including mapping the countries of origin for its significant suppliers and assessing the risk inherent in procuring from said countries. The University makes efforts to manage the risk associated with imported product in the supply chain by procuring supplies through a small number of trusted suppliers, the majority of which are located in countries with legislation enacted to preserve and protect human and workers' rights. The University has updated its Purchasing procedures to include a specific clause in its purchase order procedures regarding vendor responsibilities for reporting on Forced Labour or Child Labour and has published a certification form for vendors to use to certify they are conducting their business in a manner that respects the human rights of all individuals and upholds the dignity of labour.

Clothing and footwear have been identified as an area of risk for forced labour and child labour within the University's supply chain. To mitigate this risk, the University joined the Worker Rights Consortium (WRC) in 2016 as an affiliate institution. To become an affiliate of the WRC, the University agreed to adopt their code of conduct and commit to conducting business affairs in a socially responsible and ethical manner, holding corporations accountable and protecting worker rights. The WRC conducts independent, worker-centered investigations on behalf of its affiliates and issues public reports on factories producing clothing and footwear for major brands. The WRC assists universities with the enforcement of the labor standards they have adopted to protect workers producing apparel and other goods bearing university logos. Periodic updates are issued by the WRC to its affiliate institutions regarding factory investigations and related labour rights development, allowing affiliates to ensure that their suppliers are not procuring from factories engaged in unethical practices.

Remediation Measures, if Applicable

Based on our knowledge, the University has not identified any instances of forced labour or child labour in our supply chains. Consequently, no remediation measures were required for the fiscal year ended March 31, 2025, in respect of any modern slavery – including forced labour or child labour.

Remediation Measures re: Loss of Income to Vulnerable Families, if Applicable

As noted above, the University has not identified any instances of forced labour or child labour in its supply chains, and therefore has not taken any associated measures to remediate the loss of income to the most vulnerable families that result from measures taken to eliminate the use of forced labour or child labour in their supply chains.

Training Provided to Employees

The University prioritizes ethical conduct and recognizes the critical role our employees play in shaping our company culture and driving our success. Therefore, we are dedicated to enhancing employees' understanding and compliance to our policies and procedures.

In the current fiscal year, mandatory training was provided for procurement staff who interact with suppliers to ensure they are aware of how to reduce risk of forced labour and child labour in our supply chains. Additional training was offered to a broader base of staff through workshops on Purchasing procedures and processes.

Assessing Effectiveness of Measures Taken

Partnering with the WRC to do independent reviews of the supply chain related to clothing and footwear has been an effective way to monitor the activity of this particular supply chain. The University will continue to monitor the reports received from the WRC and assess if actions are required to be taken.

The University does not employ any other formal metrics to assess our effectiveness in ensuring that forced labour and child labour are not being used in our other supply chains. However, we intend to continue monitoring our supply chain for indicators of forced labour and child labour including performing due diligence on new vendors and on existing vendors to the extent that we learn of material changes in their circumstances. We will also continue to provide training to staff to ensure the risks related to forced labour and child labour are known. We will also endeavor to continue examining our policies and processes to address this important risk, as conducting our business with strong ethics and integrity is critical to earning and maintaining the trust of our students, faculty, employees, and community.

Approval and Attestation

This report has been approved by the Board of Regents of the University of Winnipeg on its own behalf and on behalf of the controlled entities.

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.



Bruce Miller
Chair, Board of Regents
The University of Winnipeg
Date:

I have the authority to bind The University of Winnipeg