



Fight Against Forced Labour and Child Labour in Supply Chains

April 2024 – March 2025 Annual Report



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About this Report

This report is prepared pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) (in effect since January 1, 2024). It sets out the commitment, renewed annually, by the University of Ontario Institute of Technology (“Ontario Tech University”) targeted by the legislation to prevent modern slavery, child labour, forced labour, and human trafficking in all activities and relationships with partners.

About Us

Ontario Tech University is a forward-thinking institution, committed to embracing and shaping the future. The university is dedicated to upholding compliance through integrity, ethical behavior, and good governance. The university values integrity by promoting equity, fairness, kindness, and ethics. Encouraging innovation and striving for excellence can shape Ontario Tech University’s approach to sourcing goods and services. Furthermore, the university’s commitment to social change can impact procurement practices by seeking suppliers that adhere to ethical and sustainable standards. Integrating ethical considerations into its procurement processes contributes to the fight against forced labour and child labour.

Steps Taken to Prevent and Reduce Risks

Over the last fiscal year, Ontario Tech University has made progress in advancing its efforts to prevent and reduce the risks of forced and child labour within its operation and supply chains. Our activities included the following key initiatives:

- We compiled a comprehensive list of all suppliers from whom we directly purchase goods outside of Canada and conducted a review for potential risks related to forced and child labour. No risks were identified through this review.
- A formal requirement has been instituted for all new suppliers to confirm their commitment to ethical sourcing practices, with a particular emphasis on the prevention of forced and child labour. A process has been established to obtain written attestations from these suppliers, affirming that neither they nor their supply chains engage in or support such practices.
- The university actively engaged with industry peers, including other post-secondary institutions and relevant industry associations, to exchange best practices, participate in ethical sourcing initiatives, and contribute to collaborative working groups focused on addressing forced and child labour within global supply chains.
- Procurement Policies and Procedures were revised to explicitly address the risks associated with forced and child labour. Ethical sourcing requirements have been systematically integrated into all stages of the procurement lifecycle, from supplier evaluation and selection through to contract management, to promote responsible purchasing practices and uphold the highest ethical standards.

Structure, Activities and Supply Chains

Ontario Tech University is a corporation without share capital, composed of the members of its Board of Governors. The university has established policies, processes, and governance structures to ensure its effective operation, enabling it to fulfill its mandate and achieve its institutional objectives.

As part of the broader public sector, Ontario Tech University adheres to the Broader Public Sector Procurement Directive. To support various operational needs, the university import goods into Canada from international suppliers. These imports include laboratory equipment such as specialized instruments, chemicals, and supplies to support our science and research departments. We also procure technology and electronics, including computers, software, and audio-visual equipment from global manufacturers to facilitate administrative functions, enhance classrooms learning environments, and support student services. In addition, we source maintenance supplies, equipment parts, and facilities management materials internationally to maintain the proper functioning and upkeep of our campus buildings and grounds. These imports are essential to maintaining the high standards of education, research and services provided to our students, faculty and staff.

The university's Campus Store primarily sells apparel and sundry supplies sourced from Canadian vendors and distributors. A very small percentage of textbooks are purchased directly from independent US publishers that do have no Canadian distributor due to their small size.

Policies and Due Diligence Processes

At Ontario Tech University we have comprehensive policies and due diligence processes in relation to forced labour and child labour. The following policies and procedures at the university include:

- **Procurement of Goods and Services Policy**
 - The university aspires to maintain the highest ethical, legal, environmental, managerial and professional standards in the management of resources that have been entrusted to it as a publicly funded institution. These standards can only be achieved in an environment that promotes and supports sound fiscal management and accountability, risk minimization, long-term sustainability, and social responsibility. To this end, the Procurement of Goods and Services policy is designed to define and guide in the management and control of financial expenditures in an open, fair, and transparent manner and in accordance with the broader regulatory requirements.
- **Procurement of Goods and Services Procedures**
 - The purpose of these procedures is to complement the Procurement of Goods and Services Policy by serving to define and guide individuals in fulfilling their responsibilities and obligations throughout each phase of the procurement process. These procedures are consistent with the Broader Public Sector Procurement Directive, Supply Chain Code of Ethics, Canadian Free Trade Agreement, Canada-European Union Comprehensive Economic and Trade Agreement, and have been developed to ensure that all goods and services are acquired by the university through a process that is open, fair and transparent.
- **Procurement Policy: Supply Chain Code of Ethics**
 - The purpose of the University's Supply Chain Code of Ethics is to define acceptable behaviours and standards that should be common for everyone involved with supply chain activities, such as planning, purchasing, contracting, logistics and payment. The code is not meant to supersede other university value statements or policies but rather to supplement them with supply chain-specific standards of practice.
- **Policy on Responsible Conduct of Research and Scholarship**
 - The purpose of this policy and its related procedure is to set out the standards, requirements and responsibilities that apply to the responsible conduct of research and scholarship at the university.

- **Respectful Campus Policy**
 - The Respectful Campus Policy outlines the university's commitment to promote and sustain a respectful and inclusive campus in accordance with the Ontario Human Rights Code, the Accessibility for Ontarians with Disabilities Act, and the Occupational Health and Safety Act. The purpose of the policy is to ensure the campus community is familiar with their various rights, roles, responsibilities, and obligations as they relate to preventing and responding to all forms of harassment and discrimination.
- **Ethical Conduct Policy**
 - The purpose of this policy is to promote standards of ethical conduct that advance integrity and accountability, and support the university's mission, vision and values.
- **Safe Disclosure Policy**
 - The university is committed to ethics, integrity, and compliance in all its activities. The purpose of this policy is to set out the principles for Good Faith disclosure of Improper Activity and to describe the university's response to concerns from such disclosures. The policy reflects the university's commitment to accountability and ethical conduct and supports the ability of university members to disclose concerns in good faith, without fear of reprisal. This policy is intended to address only disclosures that cannot be addressed under other policies or procedures that govern the subject matter of the disclosure.
- **Safe Disclosure Procedures**
 - The purpose of these procedures is to establish the processes for making and reviewing and/or investigating a Good Faith Disclosure under the Safe Disclosure Policy.

We remained committed to enhancing our policies and due diligence processes related forced and child labour. In support of this commitment, the university:

- We updated the university's procurement policies and procedures to specifically identify the Act and the corresponding obligations of university procurers to address by elimination, the risks of forced and child labour within the supply chain.
- Ethical sourcing requirements were embedded throughout the procurement process, from supplier evaluation and selection to contract management, to ensure that all purchasing practices support responsible and ethical standards.
- Revised the Procurement Policy & Procedure to require validation of suppliers outside Canada for compliance with forced and child labour standards. The definition of "child" reflected both legal definitions and the minimum age for employment as defined by each supplier's country of operation.
- Updated the supplier onboarding process to mandate self-attestation from all international suppliers, confirming that their supply chain did not engage in, or support forced and child labour.
- Amended purchase order terms and competitive tendering documents to explicitly state that suppliers and subcontractors must not engage in or support child labour or any form of forced labour, including indentured, bonded, or involuntary prison labour.

Steps Taken to Assess and Manage Risk

In 2025, we undertook an analysis of our operations and procurement practices particularly with respect to international imports and concluded that we have no supply chain risks with respect to forced labour or child labour particularly taken into account our de minimis (0.65%) import activity in fiscal year 2024-2025 and the sectors which these imports are coming from.

Remediation Measures

As the university has not identified any forced labour or child labour in its supply chain, we have not taken any measures to remediate any forced labour or child labour or to remediate any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities or supply chains.

Training

The university provides all legislatively required training to its employees as well as additional training on procurement and business ethics as applicable to the unit.

Assessing Effectiveness

To assess the effectiveness of its policies and procedures regarding forced labour and child labour, Ontario Tech University implemented measures to establish a schedule for periodic reviews or audits of its practices. These reviews ensured ongoing compliance and helped identify opportunities for improvement. The university also worked closely with suppliers to evaluate the effectiveness of their efforts in addressing forced labour and child labour. This included monitoring supplier performance indicators related to labour practices and collaborating on improvement initiatives.

Ontario Tech University assessed its effectiveness in preventing forced and child labour by:

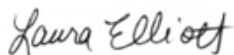
- Developed and incorporated standardized language into public tendering documents to ensure alignment with Canada's Bill S-211. All proponents are now required to confirm compliance with the legislation, outline measures taken to mitigate risks of forced and child labour and disclose any known incidents within their operations or supply chains.
- Contract language was formalized to require suppliers to comply with all applicable laws and international standards prohibiting forced and child labour. Suppliers must implement monitoring systems, report violations, and accept the university's right to audit. Breaches may result in financial penalties or contract termination.
- The university reviewed import records to identify potential risk areas. No issues were found. All new suppliers from outside Canada are now required to provide attestations affirming they do not engage in, or support forced or child labour in any part of their supply chain.
- Continued use of vendors from the Ontario Education Collaborative Marketplace (OECM) and the Ministry of Government and Consumer Services (MGCS) was encouraged. These suppliers have embedded supply chain due diligence processes, offering additional assurance of ethical sourcing compliance.

Approval and Attestation

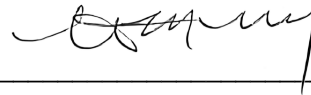
This report has been approved in accordance with the provisions of section 11(4)(a) of the Act by the Board of Governors of Ontario Tech University for the fiscal year ending March 31st, 2025.

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 list 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.

I have the authority to bind the University of Ontario Institute of Technology.



Laura Elliott
Board of Governors Chair
May 23, 2025



Steven Murphy
President and Vice-Chancellor
May 23, 2025