



Fighting Against Forced Labour and Child Labour in Supply Chains Act Public Safety Canada Report

May 7, 2025

Prepared by the Office of The
Vice-President, Finance And Operations



University
of Windsor

Corporation Profile

Reporting entity's legal name: University of Windsor

Financial reporting year: May 1, 2024, to April 30, 2025

Identification of a revised report: N/A

Business number(s): 10816 2611

Identification of a joint report: N/A

Identification of reporting obligations in other jurisdictions: N/A

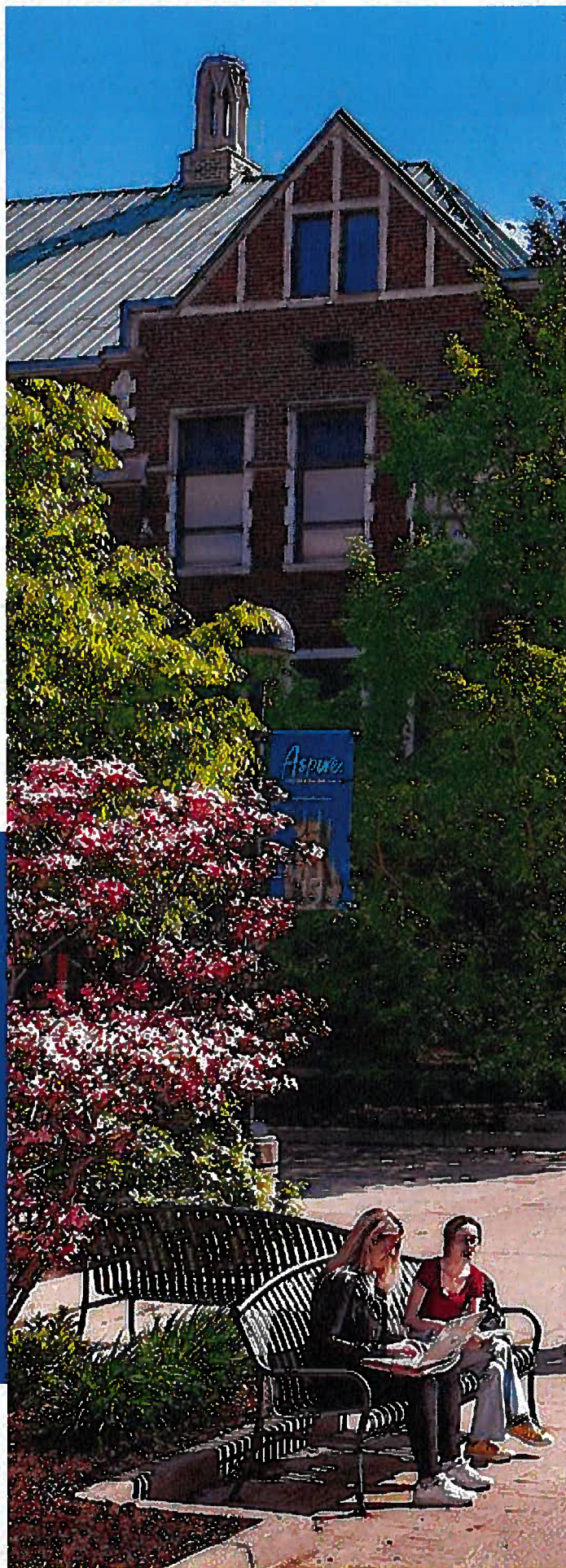
Entity categorization according to the Act: Entity (University)

Sector/industry: Public Sector / Higher Education

Location: Windsor, Ontario, Canada

Reporting Entity and Governance Structure

Created by the University of Windsor Act of 1962-63, the University of Windsor operates on a bicameral system of governance. The Board of Governors is responsible for the oversight of all operational aspects of the University. The Senate is responsible for oversight of academic matters. Both governing bodies have bylaws and policies that guide their activities.



About the University of Windsor

The University of Windsor welcomes over 16,000 students to a range of comprehensive and research-intensive graduate and undergraduate programs across nine faculties and professional schools. With an annual operating budget of over \$335 million, the University of Windsor is one of the largest employers in the region, with approximately 2,500 faculty and staff members stationed across academic, administrative, and student service areas.

As an anchor institution in Windsor-Essex, the University embraces its role in fostering regional growth through education, research, and community partnerships. It brings global perspectives and emerging knowledge to bear on local challenges, collaborating with government and industry on critical areas such as automobility, autonomous and electric vehicles, greenhouse and agricultural innovation, healthy Great Lakes, cross-border issues, and the development of safe, resilient communities.

UWindsor researchers are advancing technologies and policies that protect the environment and strengthen the social, cultural, and economic fabric of the region. Their work also extends to research of national and international importance. In 2023–24, the University’s research revenue increased by 25%, surpassing \$40 million. In the 2024 edition of Canada’s Innovation Leaders, published by Research Infosource Inc., UWindsor ranked first among Canadian universities for the share of research funding from international government sources, and second for the proportion of publications related to artificial intelligence.

The University of Windsor continues to gain recognition globally. It ranks in the top 26 percent of institutions worldwide in the Times Higher Education (THE) 2025 World University Rankings and has improved its position among the top 400 sustainable universities. The QS World University Rankings (June 2024) named UWindsor the most improved Canadian institution, rising nearly 100 places since 2021 to rank 547th of over 5,600 universities evaluated.

Our Mission

To empower positive change through regionally and globally engaged inquiry, learning, scholarship, creative activity, and research.

Our Vision

As a locally engaged, globally connected institution, the University of Windsor will enable people to transform their circumstances. As partners, leaders, and learners, we will engage in impactful research, relevant teaching, creative endeavours, and inclusive relationship building to foster positive change.

Institutional Values

The University of Windsor strategic plan's value set is robust, with the institutional values of trustworthiness and equity, diversity and inclusion along with trustworthiness being directly aligned with the spirit of the S-211 legislation:

Trustworthiness

We believe that there is value in everything that we put out to the world, and we do everything with a lot of passion.

Equity, Diversity, and Inclusion

Decolonizing the University, ensuring justice, and embedding anti-oppression and anti-racism in our institution requires long-term care and commitment. An equity focus must be engrained in all our decision-making in order to address the policies and practices that have oppressed and stigmatized community members for too long.

Excerpt from *Aspire Strategic Plan on EDI*

The University of Windsor is committed to tackling all forms of discrimination as we work toward a meaningfully inclusive, equitable, and just campus. Over the next five years, the University will broaden and deepen its efforts to dismantle systemic barriers to equity, inclusion, and justice. The University will advance efforts to be a university that consistently combats and addresses systemic barriers and discrimination on the basis of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status, disability, or any other distinguishing characteristic or trait.

This work will commit to decolonization, anti-racism, and anti-oppression, and to deeply and sustainably ingrain these changes in all aspects of campus culture and practice. It will solidify the position of the University of Windsor as a leader in truly inclusive practice. It is important to acknowledge and honour the strength, courage, and commitment of people from historically marginalized communities who often must take on this work, and to recognize the efforts of those who take on leadership roles in these efforts.

The University will act on our commitment of equity-focused approaches and create and support opportunities for transformative leadership locally and nationally.



As addressed in this report, The University of Windsor has a role in supporting ethical practices in the supply chain as per Bill S-211, Fighting Against Forced Labour and Child Labour in Supply Chains Act.

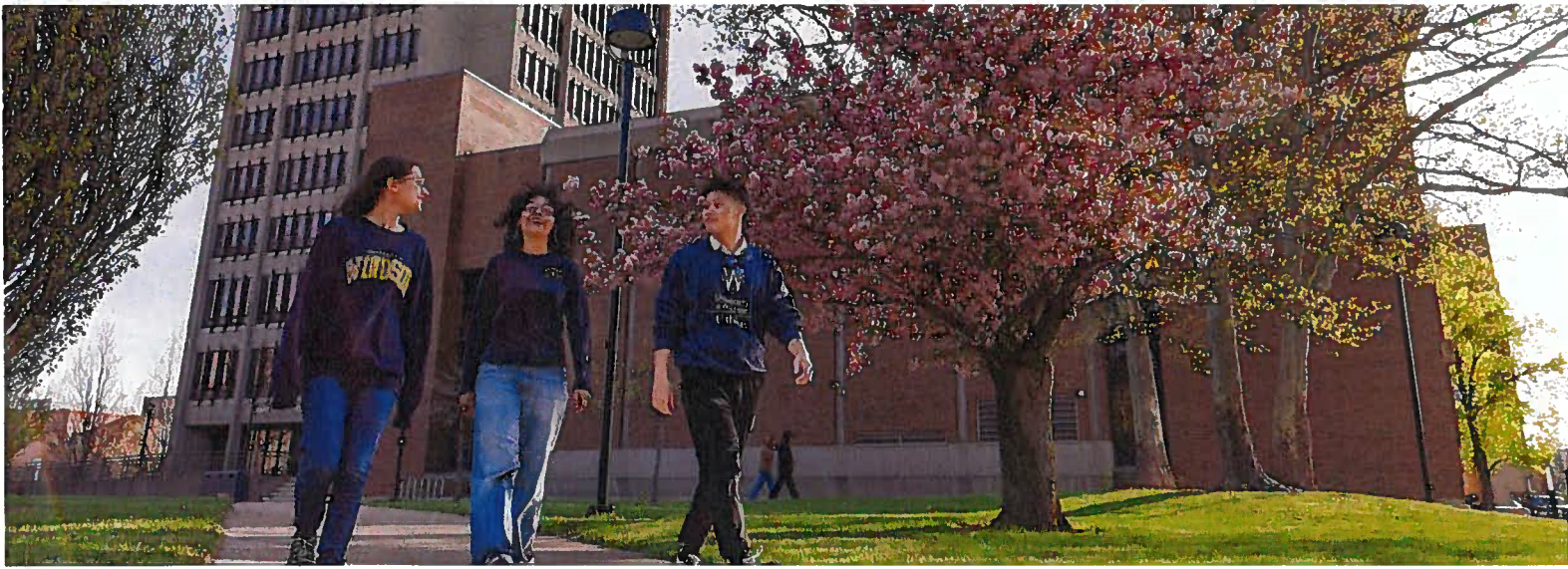
Purchasing and Supply Chain: Scope

The University of Windsor has an active supply chain which supports the delivery of our academic mission. The University of Windsor's spend for fiscal reporting year May 1, 2024, to April 30, 2025, is approximately \$66.5M of which an estimated 97% Canadian Vendors, and 3% International Vendors. Prioritizing the use of Canadian vendors and where possible, Ontario vendors, with supply chains located in Canada is a key risk mitigation strategy for the University of Windsor when it comes to reducing the risk of forced or child labour within the supply chain.

For ancillary operations such as the sale of books, courseware, spirit wear, along with food and drink, the university has outsourced these functions (including the required supply chain and inventory management) to arms length third parties. The contracts in place between the University of Windsor and these third-party vendors establish standards for goods purchased, including but not limited to prioritization of fair trade food, and establishment of environmental sustainability standards.

The University of Windsor is a participant in Ontario Education Collaborative Marketplace (OECM), which operates as an independent third party to negotiate contracts directly with vendors that can be used by UWindsor along with many other public sector entities across the province of Ontario. From time to time, UWindsor also engages in collaborative Vendor of Record (VOR) arrangements with other Ontario universities in situations of shared items of interest to leverage purchasing power, particularly in examples in the area of software and information technology services.





University of Windsor Procurement & Supply Chain Policies

The University of Windsor's policies and procedures govern our activities in procurement. The policies include, but are not limited to, the Ontario Broader Public Sector (BPS) Directive, the BPS Supply Chain Code of Ethics, the Canadian Free Trade Agreement, the Comprehensive Economic and Trade Agreement, the Ontario-Quebec Trade and Cooperation Agreement, the Freedom of Information and Protection of Privacy Act, the Accessibility of Ontarians with Disabilities Act, and the University of Windsor Procurement Policy. Our procedures are also reflected in our standard request for expression of interest, request for proposal and request for quote templates.

The primary purpose of the University of Windsor Procurement Policy is to ensure that the acquisition of goods and services is undertaken in an open, fair, transparent, efficient, ethical and cost-effective manner while obtaining the best value for money for the University.

BPS entities, including the University of Windsor, are required to use the following strategies, wherever feasible:

- Procure goods and services from Ontario businesses and businesses of Ontario's trading partners,
- Apply weighted domestic criteria in procurement evaluations (e.g. vendors to demonstrate how they meet Ontario's environmental and labour standards), and
- For procurements with an estimated value of \$50 million or more, include an Industrial Regional and Technology Benefit (IRTB) requirement for vendors. The IRTB requires vendors bidding on large procurements to detail how their proposals would provide local economic benefits for the province

Highlights of the policies and procedures listed above and their engagement with S-211 are provided in the sections of this report that follow.

Policies and Procedures: Supply Chain Code of Ethics

In accordance with the Broader Public Sector (BPS) Procurement Directive, effective April 1, 2011, and as amended from time to time, the University of Windsor formally adopts the Ontario BPS Supply Code of Ethics, as follows:

Goal: To ensure an ethical, professional, and accountable procurement program at the University of Windsor.

Personal Integrity and Professionalism:

All individuals involved in purchasing or other supply chain-related activities must act, and be seen to act, with integrity and professionalism. Honesty, care, and due diligence must be integral to all supply chain activities within and between BPS organizations, suppliers and other stakeholders. Respect must be demonstrated for each other and for the environment. Confidential and personal information must be safeguarded. Participants must not engage in any activity that may create, or appear to create a conflict of interest, such as accepting gifts or favours, providing preferential treatment, or publicly endorsing suppliers or products.

Accountability & Transparency:

Supply chain activities must be open and accountable. In particular, tendering, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for public money. All participants must ensure that public sector resources are used in a responsible, efficient, and effective manner.

Compliance & Continuous Improvement:

All BPS supply chain participants must comply with this Code of Ethics and the laws of Canada and Ontario. Participants should continuously work to improve supply chain policies and procedures, to improve supply chain knowledge and skill levels, and to share leading practices.

Policies and Procedures: Procurement Code of Ethics

The University of Windsor further requires that all individuals involved in purchasing or other supply chain- related activities must adhere to the principles and standards promulgated by the University's Procurement Code of Ethics below, to ensure ethical, professional, and accountable supply chain activities.

The UWindsor's Procurement Code of Ethics has been established, in accordance with the Ontario BPS Supply Chain Code of Ethics ("Code") to supplement other regulations, policies and guidelines related to duty of transparency and ethics that is owed to all public institutions. This Code applies to all members of the University community who are involved in the procurement process of goods and services.

The Code of Ethics is comprised of 3 elements:

1. Personal Integrity
2. Professionalism, Accountability, Transparency
3. Compliance and Continuous Improvement

It is the responsibility of each member of the University to promote the institution as one that deals fairly and equitably with all suppliers to create and maintain business relationships. This can be accomplished by:

- Maintaining fair and transparent competition among suppliers
- Being honest and truthful in all inferences and statements
- Treating all communication with vendors as confidential
- Allowing vendors a full and courteous hearing
- Never benefiting from the errors of suppliers



Policies and Procedures: Request for Information/Tender/Quote Documents and Supplier Portal

As of the current fiscal year (ending April 30, 2025), the University of Windsor has implemented mandatory compliance requirements within its standard procurement templates and updates are underway to the online supplier registration portal to include a mandatory section confirming that as an Ontario Public Sector entity, the University of Windsor is required to comply with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (S-211).

Draft Attestation Language

As an Ontario Public Sector Entity, the University of Windsor is ethically and morally responsible to comply with The Fight Against Forced and Child Labour under Supply Chain Act. This act is to protect vulnerable populations from human rights abuses, and exploitation. Any organization that enters into a contract with University of Windsor will ensure that they are compliant to this Act and hereby attests that the goods and services that the University of Windsor procures from them are not produced with forced or child labour, in alignment with the International Labour Organization Standards.

As per the Building Ontario Businesses Initiative Act (BOBI Act), the supplier must attest that they are an Ontario Business. "Ontario Business" is defined as any supplier, manufacturer or distributor who conducts their activities on a permanent basis in Ontario and, at the time of the procurement, either has headquarters or main office in Ontario or has a minimum 250 full-time employees in Ontario).



Training and Education

University of Windsor employees with purchasing responsibilities, including management, have been informed of the requirements under Bill S-211, Fighting Against Forced Labour and Child Labour in Supply Chains Act. Training and supporting resources have been shared to ensure those involved in procurement activities understand their responsibilities in upholding ethical sourcing and human rights standards. This training will continue to be offered on an annual basis to reinforce awareness and maintain compliance across the institution.

To further support awareness and accountability, dedicated educational materials have been made available on the University's Procurement website. These resources provide an overview of the University's obligations under Bill S-211 and offer guidance for both internal stakeholders and prospective suppliers engaging with the University. This reflects our ongoing commitment to ethical procurement and keeping our campus community informed and engaged.



Risk Mitigation and Measurement of Effectiveness of Policies and Controls

The University of Windsor has implemented strengthened procurement measures in alignment with both federal and provincial legislation, including the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211) and the recently introduced Procurement Restriction Policy implemented by Supply Ontario and the Ministry of Public and Business Service Delivery and Procurement (MPBSDP) on April 4, 2025. As of 2025, the University has enforced new requirements that prohibit the purchase of goods originating from the United States, except under prescribed circumstances, in accordance with provincial direction. While this restriction limits U.S.-based sourcing, the University recognizes that diversifying into other offshore suppliers introduces new risks, requiring continued vigilance in our procurement practices.

To support these efforts, the University has adopted flexible policies that enable effective management of supplier relationships while maintaining compliance with all legislative obligations. Our procurement strategy continues to prioritize Ontarian and Canadian vendors, reducing reliance on foreign supply chains where risks of forced or child labour may exist within direct or indirect sources.

To further support our ethical sourcing objectives, the University has incorporated a requirement into the Procurement Policy requiring compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211). This reinforces our expectations that all suppliers uphold responsible labour practices and comply with applicable legislation, including Bill S-211, ensuring that goods and services procured by the University are free from forced or child labour.

The University's active vendor database includes over 14,100 suppliers, with approximately 2,000 new vendor profiles added each year. In the 2025/26 fiscal year, a formal due diligence process will be incorporated through supplier selection, requiring foreign vendors to provide attestation of compliance with Bill S-211.

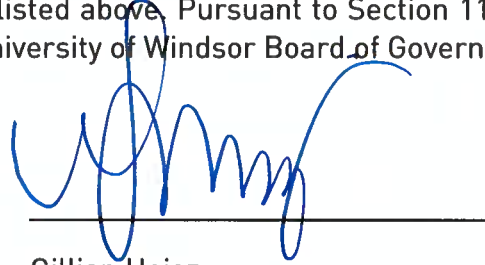
Also as part of our continuous auditing program, the University is conducting annual reviews of vendors identified as high risk for non-compliance with this legislation and the University's procurement policy. These reviews, alongside our updated procurement controls, reflect the University of Windsor's commitment to ethical sourcing, transparency, and ongoing improvement in supply chain accountability.

Approval and Attestation

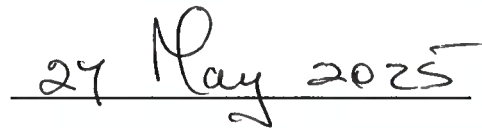
In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"), and in particular Section 11 thereof, I, the attester named below, hereby attest that I have reviewed the information contained in this report and based on my knowledge, and having 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. Pursuant to Section 11 (4)(a) of the Act, I approve this report on behalf of the University of Windsor Board of Governors.



Carolyn Brown
Chair, Board of Governors
University of Windsor



Gillian Heisz
Vice-President, Finance and Operations
University of Windsor



Date



Date

