



**VANCOUVER ISLAND
UNIVERSITY**

Bill S-211 Report

2025-06-03

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Introduction

This report has been prepared by Vancouver Island University (“VIU” or the “University”) in accordance with Section 11 of Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) and covers the financial year ending March 31, 2025.

VIU (Business Number: 107657678) qualifies as a reporting entity under the Act, as it maintains a place of business in Canada, conducts business activities within the country, and meets the prescribed thresholds for revenue, assets, and the importation of goods.

The University is committed to maintaining principles of honesty, integrity, and ethical conduct throughout its operations. VIU recognizes the importance of transparency regarding labour conditions in supply chains and acknowledges the need to identify and manage potential risks of forced labour and child labour within its procurement practices and supply chain.

This report outlines the measures taken by the University throughout the reporting year to assess, address, and prevent such risks within its operations and supply chains. VIU remains committed to continuous improvement in support of ethical sourcing and responsible supply chain management.

Structure, Activities, and Supply Chains

Structure

VIU is a publicly funded post-secondary institution established under the British Columbia University Act as a special purpose teaching university. VIU offers a comprehensive range of academic and vocational programs, including certificates, diplomas, trades training, undergraduate degrees, and graduate-level education across disciplines such as business, education, science, technology, health, and the arts. The University’s main campus is located in Nanaimo, British Columbia, with regional campuses in Cowichan and Powell River, serving students across Vancouver Island and beyond.

VIU is a registered charity governed by a Board of Governors and a Senate, in accordance with the University Act. The Board of Governors oversees the University’s corporate operations, including financial management, infrastructure, and strategic direction, while the Senate governs academic matters, including curriculum development, academic policy, program quality, and student performance.

VIU is committed to reconciliation with Indigenous Peoples, equity, diversity, and inclusion, and the advancement of sustainable and ethical practices. In 2022, the University adopted the United Nations Sustainable Development Goals (UN SDGs) as an institutional framework, reinforcing its alignment with global human rights and sustainability principles.

Although VIU’s supply chains are primarily focused on educational delivery and campus infrastructure, the University acknowledges the importance of identifying and mitigating potential risks related to forced labour and child labour across its procurement processes.

Activities and Supply Chains

In addition to its core academic operations, VIU conducts a variety of commercial and auxiliary activities across its campuses. Through its Nanaimo, Cowichan, and online bookstores, the University sells trade books, clothing, gift merchandise, stationery, art supplies, and packaged food items. The VIU Student Spa Clinic retails esthetic products, while food services on campus are delivered through a combination of in-house operations and

outsourced arrangements with reputable food service providers. For the reporting period, over 99.5% of the goods sold or consumed in these operations—including educational materials, food products, IT equipment, research supplies, furniture, and operational resources—are sourced domestically within Canada, and to a lesser extent the United States. Other jurisdictions make up less than .5% of total spend in the reporting period.

VIU is a member of several collaborative procurement networks and industry groups, including BCNET, the BC Petroleum Products Buying Group, Canoe Procurement Group of Canada, the BC Corporate Supply Arrangement, the Canadian Association of University Business Officers, and Campus Store Canada. These partnerships support the University's commitment to ethical procurement by facilitating shared standards, supplier vetting, and resource sharing related to responsible supply chain management.

Steps To Prevent and Reduce the Risks of Forced Labour and Child Labour

Throughout the reporting year, VIU undertook several steps to reduce the risk of forced labour and child labour in its operations and supply chains. These included:

- Mapping the geographic location of direct suppliers.
- Prioritizing procurement from Canadian-based vendors.
- Incorporating ethical purchasing principles into procurement practices.
- Using purchasing contract templates that require supplier compliance with core labour conventions, Canadian legislation, and ethical standards, including explicit prohibitions against forced and child labour.
- Maintaining active engagement with procurement networks such as BCNET to strengthen leverage and understanding of ethical sourcing expectations.
- Continuing to apply policies and standards of conduct that safeguard worker rights and ensure compliance with applicable safety, human rights, and employment laws.
- Encouraging employees to report any actions or omissions that may pose specific dangers to health, safety, or human rights.
- Delivering training to employees on human rights obligations and health and safety requirements.

Policies and Due Diligence Processes

VIU has integrated sustainable and ethical business practices into both its internal operations and procurement activities. The University is committed to upholding high standards of ethical conduct and fostering a culture grounded in honesty, transparency, and accountability.

The University's Purchasing Policy requires that all procurement activities be conducted in an ethical manner and in alignment with the Code of Ethics established by the Supply Chain Management Professional (SCMP). Preference is given to local suppliers when acquiring goods and services. Standard Purchase Order Terms and Conditions are incorporated into all purchase orders, ensuring consistency and clarity in supplier expectations.

VIU has a revised Goods Agreement template that incorporates labour standards requirements, including labour conventions of the International Labour Organization, the Workers' Rights Consortium, and Canadian laws. The updated terms explicitly prohibit the use of forced labour and restrict the use of child labour at any stage of production. Additionally, VIU is developing a Supplier Code of Conduct to further engage its suppliers and communicate its expectations and requirements.

VIU has also adopted internal workplace policies and standards that contribute to the prevention of forced labour and child labour within its operations. These include:

- **Health and Safety Policies:** The University's Health & Safety Policy, Employee Orientation Policy, and Responsibility for Health & Safety Procedure collectively ensure that all employees—including new and young workers—are trained and instructed to work safely. Staff are required to participate in safety training and report any hazards, injuries, or incidents of workplace violence.
- **Human Rights Policy:** This policy promotes a respectful work environment free from harassment and discrimination.
- **Violence Prevention Policy:** VIU's Policy on the Prevention of Violence in the Workplace prohibits acts of violence against employees and sets expectations for a safe working environment.
- **Contractor Oversight:** Contractors engaged by the University are required to verify the identity, qualifications, and employment history of individuals involved in their operations. VIU retains the right to conduct a security interview with any individual where reasonable concerns are identified.

As part of its commitment to strengthening due diligence practices, VIU engaged a third-party service provider in May 2025 to support the development of a formal due diligence framework. This initiative is intended to align with best practice, and with the University's responsibilities under the Act. Additional details regarding this engagement are provided below.

Forced Labour and Child Labour Risks

As part of its commitment to responsible governance and compliance with the Act, VIU has integrated supply chain-related risks into its formal enterprise risk management (ERM) process. This framework allows senior leadership to systematically identify, assess, and monitor emerging risks across operations and to report regularly to the Board of Governors.

In May 2025, VIU conducted a targeted supply chain risk assessment focused on identifying potential exposure to forced labour and child labour. The goal of this assessment was to proactively highlight where risks could reasonably exist within the University's procurement activities and vendor relationships.

The methodology combined a geographic and product-based lens, informed by globally recognized external sources such as the Walk Free Global Slavery Index and the U.S. Department of Labour's List of Goods Produced by Child Labour or Forced Labour. Particular attention was given to countries and goods historically associated with higher vulnerability to labour exploitation, especially in jurisdictions where enforcement mechanisms are weak or fragmented. This evidence-based approach enabled VIU to set the foundation for ongoing risk monitoring and mitigation. For the reporting period, it was determined that both jurisdictional and product level risk, as it relates to forced or child labour, is low.

The University recognizes that even institutions with relatively localized supply chains are not immune to the broader risks present in complex global supply networks. As such, VIU will continue to build on this assessment through its ERM framework, ensuring that future procurement and contracting decisions reflect an understanding of human rights risk exposure and evolving due diligence obligations.

Remediation Measures

Throughout the reporting year, VIU did not identify any instances of forced labour or child labour within its operations or supply chain. As such, no remediation measures have been required.

The University acknowledges that risks may reside in the broader and less visible tiers of its supply chain. VIU remains committed to refining its understanding of these risks as its due diligence capabilities are enhanced. Should indicators of forced or child labour be identified, VIU will respond promptly with appropriate corrective measures. These actions will prioritize the protection of affected individuals and support the long-term prevention of recurrence, consistent with the University's ethical obligations.

Remediation of Loss of Income

Throughout the reporting year, VIU did not identify any instances of forced labour or child labour within its operations or supply chains. As a result, no remediation actions were required, and no measures were implemented to address potential loss of income to vulnerable families arising from the elimination of such practices.

Nonetheless, VIU remains committed to responding appropriately should such cases arise in the future. This includes implementing corrective measures that account for the welfare and livelihood of affected individuals, in alignment with the University's ethical standards and statutory obligations.

Training

VIU recognizes that employee awareness is a critical component of effective supply chain governance. Although the University did not implement any formal or targeted training programs related to the risks of forced labour or child labour during the reporting year, it remains attentive to emerging risks and evolving regulatory expectations.

VIU is committed to internal training initiatives in future reporting periods. In May 2025 VIU contracted a third-party to support training on the risks of forced and child labour, to be administered in June 2025. The training will include three key focus areas: building awareness of forced and child labour laws and compliance; developing skills to identify and assess related risks; and reviewing response strategies for managing red flags across risk categories.

Assessing Effectiveness

During the reporting year, VIU did not conduct a formal evaluation of the effectiveness of its measures to prevent or mitigate the risks of forced labour or child labour and did not adopt specific processes to assess the effectiveness of its approach to preventing and reducing the risk of forced or child labour in its supply chains.

VIU recognizes the importance of regularly assessing the adequacy and impact of its risk mitigation strategies. As part of its ongoing commitment to responsible supply chain management, the University is prepared to introduce appropriate assessment mechanisms should its risk exposure evolve in future reporting periods.


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 this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information contained in this report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year indicated.

X James Cassels
Full Name

X Chair, VIU Board of Governors
Title

X June 5, 2025
Date

X 
Signature*

*Signature, accompanied by the statement "I have the authority to bind 'Vancouver Island University.'