

# **Bill S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act**

**Entity Report for Wilfrid Laurier University**

**May 1, 2024 to April 30, 2025**

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## 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 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.

Full name: Simon CHAN

Title: Chair, Board of Governors

Date: April 24, 2025

Signature: 

I have the authority to bind Wilfrid Laurier University.

# Reporting Details

**Reporting entity's legal name:** Wilfrid Laurier University

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

**Identification of a revised report:** N/A

**Business number(s):** 108208786RT0001

**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:** Waterloo, Ontario, Canada

## Introduction

With origins dating back to 1911, Wilfrid Laurier University is a post-secondary university with locations of operation in Waterloo, Brantford, Kitchener, Toronto, Milton, and Yellowknife.

Wilfrid Laurier University is committed to academic excellence. Laurier's holistic approach to learning integrates innovative programming with hands-on experience outside the classroom to ensure Laurier graduates are not only ready for the future but are inspired to leave their mark on the world. Community is at the heart of everything the university does. Laurier inspires students to engage in campus life and the broader community, leading to high levels of student satisfaction and engaged alumni who carry the Laurier legacy throughout the world. As a community of researchers, leaders and educators, Laurier builds knowledge that serves society and creates connections that have a lasting impact.

In 2024, it was estimated that the university had 1,283 full-time employees and 587 full-time faculty. It is estimated that the university had 17,225 full-time undergraduate students, and 1,368 full-time graduate students. To learn about the university's [strategic plan, mission](#), and more, please visit [wlu.ca](http://wlu.ca).

# University Structure

Wilfrid Laurier University was created by a special act of the Ontario Legislature in 1973 (Wilfrid Laurier University Act (the Act)) and is classified as a not-for-profit corporation in the province of Ontario.

The university has a bicameral governance system. The bicameral governance system provides for two separate and distinct governing bodies: the Senate and the Board of Governors. The powers of both the Senate and the Board of Governors are set out in the Act.

While each governing body has its own responsibilities, there are many areas where both bodies must act to advance a university initiative. The Act also outlines the membership of each governing body, which is broadly representative of the university community and external stakeholders. Each governing body has appointed and elected members, with cross-appointments to ensure open communication between the two.

## Office of the President

The president of Laurier is appointed by the Board of Governors, following advice from the Senate. The president is the chief executive officer of the university and has supervision over, and direction of, the academic work and general administration of the university, the members of faculty, officers, employees, and students thereof, and such other powers and duties as from time to time may be conferred upon or assigned to the president by the Board of Governors.

The Board of Governors, following advice from the Senate, also appoints a vice-president: academic, and may appoint one or more additional vice-presidents who make up the university's senior leadership team.

## University Secretariat

The University Secretariat provides professional advice to and facilitates the work of the Senate, Board of Governors, their committees and councils, participants and resources on all matters relating to university governance. The Secretariat is responsible for supporting the development, revision, and interpretation of university-level policies, and keeping the official records of governing documents and records of decisions made by the governing bodies.

# Activities, Supply Chain and Potential Areas of Risk

The university's primary business is as a post-secondary university with administrative and ancillary units which support operations. Specific business units or ancillaries identified in this report sell or resell goods to the university community and/or public.

## **Goods for Sale**

### Campus Store (Hawkshop)

The university's campus store operates locations at the Waterloo and Brantford campuses as well as its website. Merchandise includes but is not limited to printed books, apparel, giftware, stationery, and limited technology (USB cables, earbuds, etc.). The Hawkshop estimates its cost

of goods sold for physical merchandise to be \$1.4 million CAD excluding digital material, internally printed course packages, and freight. Most goods are purchased through small businesses, while some goods such as electronics may be purchased through multinational companies.

Locations of Hawkshop Tier One Suppliers:

Supplier location	% of Purchases
Canada	80%
USA	20%
Overseas	0%
<b>Total</b>	<b>100%</b>

A significant portion of goods are sourced through Canadian businesses, with approximately 20% purchased from suppliers in the United States. As discussed below under “Potential Areas of Risk”, the Hawkshop is cognizant of the risks in the supply chain in some categories such as promotional products, apparel, and electronics through tier two or tier three suppliers. Since the last reporting period, new contracts within scope of the University’s Ethical Purchasing Policy have included the requirement to comply with this policy and to provide their own relevant policies and procedures. A repository has been created housing responses from key vendor partners who have provided copies of their policies and procedures for identifying, addressing, and mitigating the use of forced labour and/or child labour in the organization’s activities and supply chains.

The Hawkshop is aware that a significant number of tier one and tier two vendors are participating members in the Fair Labor Association.

Some tier one vendors have their own policies in place including but not limited to;

- <https://www.fotlinc.com/code-of-conduct/>
- <https://bruzer.com/social-compliance/>

### Wilfrid Laurier University Press

Wilfrid Laurier University Press is a scholarly publisher specializing in social sciences and humanities books. In 2024 the Press published 16 print titles, 10 eBooks, and 8 audiobooks. Currently, WLU Press has over 700 titles in print. The Press has an international distribution network with centres in Toronto, Ontario; La Vergne, Tennessee, USA; and Harrogate, UK. Books are produced domestically for North American distribution, while international orders are fulfilled through print-on-demand partners. WLU Press does not import goods, and its operations are based at Wilfrid Laurier University in Waterloo.

### Food Services

The university utilizes a third-party provider for its food services. Food and beverage products are sourced and provided by the third-party contractor under this agreement. While the service provider endeavours to purchase local, seasonal, and responsibly raised, grown and sourced products whenever possible, there may be a risk of forced/child labour down the supply chain in some categories or subset of categories. The third-party provider requires that its suppliers to

comply with all applicable laws and they have policies and procedures which set expectations for their suppliers regarding human and labour rights, including child and forced labour. These policies and procedures are as follows:

- A human rights statement
- A business conduct policy
- A supplier code of conduct

## **Imports into Canada**

For the period June 1, 2024 to January 31, 2025, the university imported goods with a total value of \$483,084 CAD through its customs broker. This includes an estimated 140 shipments containing approximately 3200 items in total. Approximately 32% of those shipments contained items with certificates of origin from outside of Canada or the United States. Most imports spanned the following categories:

- Apparel
- Books
- Electronics
- Laboratory supplies and chemicals
- Promotional or licenced products
- Scientific equipment

These imports were low in quantities with certificates of origin from the following countries:

- Australia
- Belgium
- Czech Republic
- France
- Germany
- Honduras
- Hungary
- India
- Israel
- Japan
- Pakistan
- Philippines

- Portugal
- Republic of China
- Republic of Korea
- Romania
- Singapore
- Slovakia
- Sweden
- Switzerland
- Taiwan
- United Kingdom

Imports with certificates of origin from Canada and the US covered the same categories.

## University Supply Chain

The university conducts procurement activities in accordance with its Procurement and Tendering Policy, Supply Chain Code of Ethics as well as relevant directives and trade agreements including but not limited to the following:

- Broader Public Sector Procurement Directive
- Canadian Free Trade Agreement
- Canada-European Union Comprehensive Economic and Trade Agreement

The university's Procurement Services department oversees the majority of procurement activity within the University. While procurement activities below \$100,000 are decentralized, reviews under specified conditions are embedded into workflows in the university's procure-to-pay system to confirm alignment with the university's procurement policy. In cases where policy has not been followed, and the goods have already been received, services rendered, or a contract executed, the Procurement Services department uses the opportunity to educate regarding policy requirements to reduce the risk of recurrence. The university also utilizes a corporate paid purchasing card program for low dollar procurements and eligible expenses which are routed through the university's expense management system for after-the-fact approval by the cardholder's manager or designated approver. Due to the volume of transactions, the university's corporate card auditor is not able to audit all transactions but does utilize workflow routing to mitigate risk. Some units, such as the Hawkshop and university library, conduct procurements independently using different systems. Many of these acquisitions fall outside of public procurement and tendering requirements.

Where public competitive procurement is required, the university uses these principles to engage in fair, open, and transparent processes. Where feasible, the university also leverages collaborative procurement opportunities and vendor of record arrangements such as those available through local purchasing cooperatives, Ontario Education Collaborative Marketplace (OECM), or Supply Ontario to increase efficiencies, and achieve economies of scale.

Examples of goods and services procured by the university to support operations include but are not limited to:

- Apparel (sports uniforms, staff uniforms, goods for resale etc.)
- Architectural and engineering services
- Athletic equipment and supplies
- Books and periodicals
- Construction services and trades
- Consulting services
- Custodial services, supplies, and equipment
- Financial services
- Food services
- Furnishings and appliances
- Information technology products, services, and electronics
- Laboratory supplies and chemicals
- Legal services
- Marketing and advertising services
- Maintenance repair and operating supplies
- Paper and office supplies
- Promotional and licenced products
- Safety supplies and equipment
- Scientific and/or research equipment
- Security services
- Vehicles
- Waste management services

From June 1, 2024, to January 31, 2025, a total of 8347 purchase orders were created in the university's procure-to-pay system and issued to 1238 vendors. Over 96% of those purchase orders were issued to businesses within Canada, which accounted for almost 93% of PO spend. This includes a broad range of goods and services, some of which may be considered out of scope of the Act, or less at-risk for the use of child or forced labour.

Location of PO Fulfillment Address	PO Count	% PO Count	Sum of Total Extended Prices (CAD)	% Total Extended Price (CAD)
Canada	8,347	96.74%	\$51,928,166	92.90%
United States	265	3.07%	\$3,782,325	6.77%
Europe	13	0.15%	\$182,105	0.33%
Other	3	0.03%	\$4,754	0.01%
<b>Grand Total</b>	<b>8,628</b>	<b>100.00%</b>	<b>\$55,897,351</b>	<b>100.00%</b>

While this is not a comprehensive list of all university spend during the reporting period, a review was completed of the purchase orders created in this system during this period. This was not intended as a supply chain mapping exercise but rather as a means to identify potential areas of risk with respect to the Act.

## Potential Areas of Risk

Canadian businesses, or businesses with a Canadian fulfillment address form the majority of known suppliers to the university this fiscal year. As certificates of origin can currently only be confirmed for procurements where the university is the importer of record, there may be potential risk for forced and/or child labour in the supply chain via direct imports, or through tier 2 or tier 3 suppliers. [The US Department of Labor report: 2024 List of Goods Produced by Child Labor or Forced Labor](#) was consulted for the development of this list. Categories or subsets of these categories may include but may not be limited to:

- Apparel
- Construction Materials
- Food and beverage
- Furniture
- Information technology products, and electronics
- Laboratory supplies and chemicals
- Paper products and office supplies
- Promotional and licensed products
- Safety supplies or equipment

# Policies and Due Diligence, Remediation, Assessment of Effectiveness, and Training

In addition to the policies mentioned under our supply chain activities, the university has an existing policy which aspires to reduce the risk of child and forced labour in the supply chain of apparel and licensed goods. 5.9 Ethical Purchasing Policy, is a supplier code of conduct which applies to contracts in scope which include but are not limited to:

- a) All suppliers entering into contracts with the university that have a value of greater than \$50,000 and a duration of longer than one year.
- b) All suppliers entering into contracts with the Hawkshop that have a value of greater than \$10,000 and a duration of longer than one year.
- c) All suppliers entering into a contract with Laurier Athletics that have a value of greater than \$25,000 and a duration of longer than one year.

The code places the onus on the suppliers who indicate compliance to ensure that all subcontractors within their supply chain are also compliant.

The policy speaks to:

1. **Remediation** - If the university determines that any supplier or licensee has failed to comply with the policy, then upon consultation with the party, the university may require that the party implement a corrective action plan on terms acceptable to the university. The remedy will include taking all those steps necessary to correct such violations including, and without limitation, paying all applicable back wages, or any portion of them, found due to workers. Wilfrid Laurier University reserves the right to terminate its relationship with any supplier or licensee that continues to conduct its business in violation of this code.

If abusive conditions are discovered at a production worksite and exposed to public view, the supplier must endeavour to correct conditions and not to make a quick exit from the site. Suppliers and licensees shall not shift orders from a production worksite in response to successful worker organization and collective bargaining or due to contractor meeting or exceeding the standards set in this code.

## 2. **Standards regarding:**

- a. Forced Labour
- b. Child Labour
- c. Harassment or Abuse
- d. Discrimination
- e. Hours of Work
- f. Freedom of Association and the Right to Bargain Collectively
- g. Wages and Other Compensation
- h. Health and Safety
- i. Employment Relationship

- j. Reproductive Rights
- k. Local Labour Laws
- l. Universal Declaration of Human Rights

3. **Compliance and Disclosure requirements for suppliers** - This section covers disclosure requirements with respect to supplier locations, contact information and compliance with the code.

While this policy provides a strong foundation and addresses many key elements with respect to child and forced labour, a review is currently underway to assess scope and ensure key areas are addressed. The policy does not contain language with respect to assessing the effectiveness in ensuring that forced labour and child labour are not being used in our supply chains. Awareness has been raised with stakeholder units to ensure the policy is consistently embedded into all applicable contracts within its scope on a go-forward basis.

The university is committed to increasing awareness of the requirements under Bill S-211. As part of this effort, Procurement Services is collaborating with the Ontario University Professional Procurement Management Association (OUPPMA) to develop a common training framework on forced and child labour for procurement professionals. The framework aims to help procurement professionals recognize and mitigate human rights risks in supply chains, ensure compliance with Bill S-211, and support ethical procurement practices through informed decision-making, stakeholder engagement, and supplier accountability.

To provide structured training, a **modular framework** is being developed, offering targeted guidance on key aspects of human rights in procurement:

1. **Module 1: Awareness of Human Rights in Supply Chains**  
Covers procurement's role in ethical sourcing, key compliance requirements under Bill S-211, and identifying red flags in high-risk industries.
2. **Module 2: Interacting with Internal Clients on Human Rights**  
Focuses on legal, financial, and reputational risks, high-risk procurement areas, and balancing cost considerations with ethical decision-making.
3. **Module 3: Interacting with Suppliers on Human Rights**  
Provides strategies for setting expectations, addressing violations, conducting due diligence, and enforcing a Supplier Code of Conduct.

In parallel, the Ontario university sector is working with **CASPAR**, a national association focused on Sustainable Procurement, to develop an awareness video for their broader campus communities of decentralized purchasers. This video will cover human rights risks, modern slavery, and ethical supply chain management.

These training development initiatives are expected to launch in 2025, with rollout plans to follow.

## Steps taken over last fiscal year to reduce risk of forced and child labour

In preparation of this report, named departments in the university's Ethical Purchasing Policy were consulted, to determine whether the existing policy has been consistently applied to new agreements within scope of that policy, since the last reporting period, or if similar language had been applied to new agreements currently out of scope . There was also communication with some business units not specifically named in this policy, who may engage in contracting suppliers in industries considered at-risk, but out-of-scope of the current policy's application, to learn if language has been embedded into agreements with respect to forced and child labour.

While there have been no new major university-wide contracts signed within scope during this last fiscal year, this policy has been implemented into new applicable Hawkshop agreements.

A review of the university's Ethical Purchasing Policy has begun to determine if the scope of application should be revised or broadened to include products or services related to other industries considered at-risk. The training development initiative described under "Policies and Due Diligence, Remediation, Assessment of Effectiveness, and Training" is also new for this period.

While a fulsome supply chain mapping exercise has not been completed, a review of imports since the last reporting period supports the fact most of the university's imports through our broker of record are low in value, and low in quantity. The university spends a significant portion of its purchasing dollars with suppliers within Canada, where the university is in most cases, not the importer of record. While not exhaustive of all procurements, a review of purchase orders issued through the university's procure-to-pay system was also conducted. While less than 4% of purchase orders issued through that system were issued to fulfillment addresses outside of Canada, there may be risks associated with the use of child and forced labour in at-risk goods and services, further down the supply chain through indirect suppliers and in purchases made outside of the system.

