



2026 Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Introduction

This report has been prepared by Camosun College (“Camosun” or the “College”) in respect of Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for our financial year ending March 31, 2026.

Camosun is committed to ethical, sustainable, and responsible procurement practices. In 2024 we established a Supplier Standard of Conduct that provides an accountability framework for our suppliers to mitigate and reduce the risk of forced labour and child labour in our supply chain. In March of 2025 we established a Purchasing and Procurement Ethical Sourcing Statement as an overarching commitment to reducing the risk of forced and child labour in supply chain. Both documents are included in public solicitations for goods and services.

Structure, activities and supply chain

Camosun College is a publicly funded post-secondary institution in Victoria, British Columbia, incorporated under the BC *College and Institute Act*. Camosun commenced operations in 1971. We operate two campuses in Victoria, the Lansdowne Campus and the Interurban Campus. We have approximately 1,300 employees, some of which are unionized.

Camosun is a registered charity governed by a Board of Governors, the majority of which are appointed by the province of British Columbia. The Board of Governors is responsible for establishing appropriate governance policies in compliance with the *College and Institute Act* and ensuring that the policies and directives of the college comply with applicable legal and regulatory requirements.

Camosun sells trade and training books, tool kits, clothing, school supplies, stationery, giftware, and packaged food on our campuses. To support our academic and operational activities, Camosun procures a variety of goods, including research materials and equipment, books, paper goods, education textbooks, electronic parts, equipment and devices, lab materials, dental and healthcare supplies, and many other commodities.

Our detailed assessment of Tier 1 and Tier 2 suppliers captured the type and origin of all goods procured during the reporting period. While Best Value analysis guides our preference for domestic sourcing, we supplement with international imports when required to meet operational needs.

Country of Origin

Using VFCC invoice-value data, 74.5% of imported goods originated from the United States, 11% from China, with the remaining volume sourced from other countries across Asia and Europe.

Type of Goods

Using VFCC invoice-value data, Dental Instruments represent our largest import category at 49.5%. Books and textbooks follow at 16%, and electronics, devices, and components collectively account for 12% of total import value.

Given that the goods we procure are primarily consumed internally through teaching and operational activities—and only a small portion is resold—our overall leverage over the broader supply chain remains limited. Camosun College is a member of BCNET, a non-profit organization that provides post-secondary institutions in British Columbia access to product agreements, which increases our leverage over procurement, which positions us to advance sustainability and ethical buying practices.

Steps to prevent and reduce the risks of forced labour and child labour

In our financial year ending March 31, 2026, Camosun’s approach to preventing and reducing the risks of forced labour or child labour in our operations and supply chain included:

- Ongoing administration, publishing, and communication of the college Ethical Sourcing Statement, particularly in publicly posted procurement solicitations.
- Ongoing publication of the college Supplier Standard of Conduct in publicly posted procurement solicitations, as a tool to hold suppliers accountable for ethical and legal conduct, including addressing the risks of forced labour and child labour
- Ongoing monitoring of supplier activities and conduct
- Implementation of a college-wide ban on suppliers identified as high risk for forced and child labour
- Ongoing college-wide purchasing and procurement training sessions that include topics on ethical sourcing, supply chain transparency, and supply chain risks
- Continued use of policies and standards of conduct to protect the rights of workers in our operations and comply with safety, human rights, and employment laws
- Applying our College-Wide Risk Management policies and standards to identify and mitigate risks in our operations and activities
- Encouraging reporting of any wrongdoing, act or omission that may pose danger to the life, health, or safety of people
- Continuing to be an active member of BCNET to improve our leverage over ethical procurement practices

Policies and due diligence

Camosun has adopted policies and procedures that incorporate sustainable business conduct in our operations and supply chains.

In our operations, we address the risks of forced labour and child labour by:

- Utilizing our Corporate Relations Policy, which guides our decision-making with respect to the nature of relationships that Camosun develops with the business and professional community
- Employing our Standards of Conduct Policy that set the standards expected of our employees. Our employees are to always act in an honest and ethical manner, and in compliance with all applicable laws and regulations. Compliance with the Standards of Conduct is a condition of employment with Camosun.
- Upholding policies, rules, and procedures to comply with applicable Canadian laws and our collective agreements relating to health and safety, human rights, and employment standards regulations governing our hours of work, safe working conditions, and age of employment.
- Encouraging reporting and investigating any respectful workplace, health and safety, human rights, or other complaints relating to our values of equity, safety, and respect for workers, students, and our community. Our Protected Disclosure Policy sets out our commitment to protect any employee who reports a wrongdoing that could pose danger to life, health, or safety of people, or to the environment.

In our supply chains, we have taken — and continue to take — concrete steps to address the risks of forced labour and child labour by:

- Maintaining centralized procurement oversight. Our dedicated Procurement Specialist ensures that public procurement standards and legislation are consistently upheld throughout the procurement cycle, enforces compliance with internal guidance, and provides ongoing training to employees on our procurement standards.
- Implementing and actively applying our Commercial Activity Policy. This policy guides decision-making related to commercial access on campus for Camosun-operated or contracted services (e.g., food services, vending, health-related or personal services). We continue to ensure that all such relationships align with Camosun’s mission, values, policies, and priorities.
- Upholding a purchasing accountability framework. Through our Purchasing Policy, we require all procurement activities to comply with applicable laws governing the acquisition of goods and services, including legislation related to assessing and preventing forced labour and child labour. We continue to apply these requirements across all purchasing activities.
- Promoting our Purchasing and Procurement Ethical Sourcing Statement. We continue to train the college community on its purpose, implications, and the ways in which we engage in ethical sourcing across our supply chains.
- Administering a Supplier Standard of Conduct. This standard sets clear expectations for suppliers based on established human rights principles and Camosun’s values. We require suppliers to demonstrate transparency, accountability, and ethical practices throughout their supply chains, including compliance with labour and human rights regulations, fair wages, reasonable working hours, and freedom from harassment or discrimination. Suppliers must not use forced labour, bonded labour, or child labour in any part of their operations. We continue to reinforce these expectations in our supplier relationships.

Assessing risks of forced labour and child labour

Camosun College follows a documented, coordinated approach to risk management through our College-Wide Risk Management policy. We recognize that a coordinated risk management approach is critical to the achievement of our key objectives and strategic goals. Upon identification of a risk, we have a risk analysis measurement tool, which measures the likelihood of the probability of the risk event occurring and based on this, our Risk-Treatment Action plan kicks in to set out a proposed plan. This risk management approach enables Camosun to assess supply chain risks.

Our procurement team assesses risk using the Global Slavery Index, WalkFree.org, and guidance issued by the Government of Canada. We recognize that global electronics supply chains carry elevated risks, particularly when goods originate from conflict-affected regions or jurisdictions with weak labour protections. Through this assessment and the application of our learning, we identified two suppliers whose risk of forced labour and child labour was determined to be extremely high, if not unavoidable. These suppliers have been banned from doing business with the College. We remain committed to strengthening and continuously improving our approach to identifying and mitigating forced labour and child labour risks across our supply chain.

Remediation measures and remediation of loss of income

We encourage our employees to report conduct that violates our policies or that could pose danger to life, health, or safety of people, or to the environment. Camosun does not tolerate any form of retaliation against any employee who reports a violation of our policies.

Camosun is not aware of any incidents or reports of forced labour or child labour in respect to our operations or supply chain, and as such, we have not taken any remediation measures or remediation of loss of income to families because of forced labour or child labour.

Employee training

Camosun provides training to employees on our workplace policies and Standards of Conduct. We also provide mandatory training on our procurement practices and policies to our employees involved in procurement on our procurement policies and trade agreements. In addition, we regularly provide voluntary training sessions for all staff and faculty relating to procurement ethics. In this reporting year, we delivered training for our employees specifically related to the risks of forced labour and child labour in supply chains.

Assessing the effectiveness of our approach

Our Supplier Standard of Conduct requires our suppliers to maintain accurate documentation and records to demonstrate their compliance with the Act, which enables us to audit or otherwise assessment compliance and continuous improvement. Our risk analysis management tool also enables us to monitor and track emerging risks to our operations and supply chains and assess our effectiveness in preventing or responding to those risks.

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 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.

Dated in the City of Victoria, British Columbia, this ___ day of _____, 2026.

NAME:

TITLE:

I have the authority to bind Camosun College.