

Bill S-211: Fighting Against Forced Labour and Child Labour in

Supply Chains Act Public Safety Canada Report

University of Western Ontario

Reporting entity's legal name: University of Western Ontario

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

Identification of a revised report: N/A

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Entity categorization according to the Act: Entity (University)

Sector/industry: Public Sector / Higher Education

Location: London, Ontario, Canada

Introduction

At the [University of Western Ontario](#) (Western University or Western) we recognize that modern slavery remains prevalent around the world. We are a leading research-intensive university and global community of individuals focused on making change in the world, today, and are committed to playing our role in mitigating all forms of modern slavery within our operations and supply chains. In addition to Western University's strategic plan, [Towards Western at 150](#), which identifies global sustainability as a key focus, the University has initiated a number of activities to strive toward ethical supply chain management. This report will serve to address these activities as they relate to **Bill S-211, Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act)**.

Reporting Entity and Structure

The University operates under the governance framework set forth by the University of Western Ontario Act, 1982, which establishes its primary governance bodies: the Board of Governors, the Senate, and the University Council. The [Board of Governors](#) is responsible for the overall governance of the University. In consultation with Senate, the Board sets the strategic direction of the institution. The Board appoints the President and Vice-Chancellor, Vice-Presidents, Deans, and other senior administrators of the University. The Board has responsibility for all financial matters and matters related to property. It establishes and enforces regulations for the use of the University's buildings, grounds and ancillary operations, approves the University's operating and capital budgets, oversees expenditures from those budgets, and sets fees.

The University is globally minded and attracts students and staff from around the world. It aims to attract, develop, reward, and retain top-tier talent to maintain its status as a leading institution in teaching and research. Western has a strong international presence, with partnerships, research collaborations, and alumni networks spanning the globe.

As of January 2025, the University employed 1,432 faculty members, 2,789 staff members, and welcomed approximately 41,000 full-time students¹. The University reported revenues of \$1.6 billion and had assets of \$4.8 billion in fiscal 2024².

Supply Chain Activities

Western engages in extensive procurement activities, adhering to public procurement regulations and ethical sourcing practices. These activities encompass a broad spectrum of goods and services, including but not limited to construction, office supplies, electronics, food and catering, travel services, laboratory equipment and supplies, books, printing services, and waste management. The central Procurement Services unit manages oversight and compliance with domestic directives, legislation, and international trade agreements, and manages procurements through collaborative frameworks, notably with the Ontario Education Collaborative Marketplace (OECM) and other consortia, to leverage collective purchasing power and achieve cost efficiencies. Operating in a decentralized environment, individual units manage procurement processes where the value is less than the open competitive threshold as outlined in the [Broader Public Sector Procurement Directive](#).

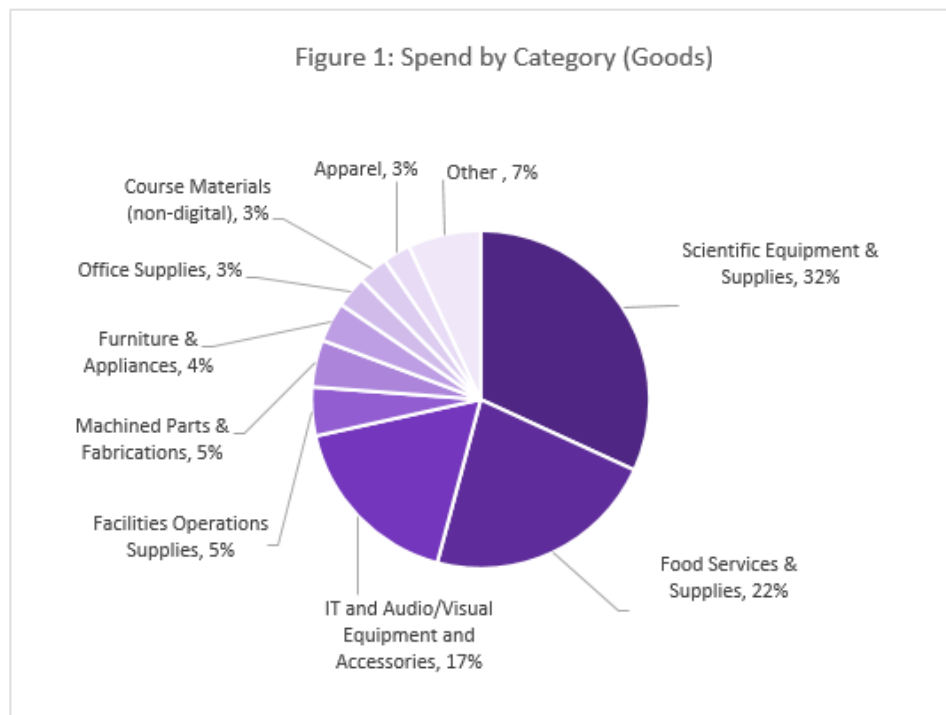
¹ About Western – Facts & Figures <https://www.uwo.ca/about/whoweare/facts.html>; Summary of Enrolment <https://www.ipb.uwo.ca/db/student-enrolment/suepp.php>

² Western University Financial Statements https://www.uwo.ca/finance/forms/docs/corporate_accounting/2024.pdf

The University recognizes the existence of modern slavery risk across its supply chains and, further, that these risks may be elevated in certain supply chains due to factors such as geographical location and/or source locations for materials and products the University procures. There is an identified lack of visibility in certain overseas markets which may present increased risk of modern slavery, especially in secondary (and further) supply chain tiers, and in source materials used in the University's goods and services.

Category Spend

Western's spend on goods *in scope* of the Act during the reporting period was approximately \$86 million (Figure 1).



The following are identified as high-risk categories relevant to the University. 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.

- Electronics
- Apparel
- Furniture
- Timber and paper products
- Food & beverage (coffee)

In addition, Scientific equipment and supplies is identified as a category which may carry risk in the supply chains.

Local Buying

Operational units strive to work with local suppliers. Approximately 88% of spend on all goods *in scope* of the Act is with Canadian businesses, and 11% with suppliers in the United States. In compliance with the [Building Ontario Business Initiatives Act](#), effective April 1, 2024, Western further prioritizes spending with Ontario-based businesses. Geopolitical events in early 2025, specifically concerning tariffs, have further prioritized spend within Canada particularly for impacted categories.

A high-level assessment was conducted on international spend with suppliers located in high-risk countries. The result was a very nominal occurrence of spend, which was largely with service firms not in scope of this report. However, the University acknowledges the risk of forced or child labour in our supply chains which are not covered by our initial assessment of our direct (tier 1) suppliers.

Policies and Due Diligence Processes

The University's procurement policies and procedures govern our activities and aim to reduce the risk of modern slavery in our operations and supply chain. Western's [Sustainable Procurement program](#) incorporates social, governance, and ethical considerations into procurement policy. As part of the University procurement policy, employees are required to consider the ethical and governance impacts of all purchasing decisions.

In addition to internal programs, Western Procurement Services works collaboratively with the Ontario University Professional Procurement Management Association and as a member of [CASPAR](#), a Canada-wide inter-university working group on Sustainable Procurement, on various initiatives including supplier engagement and development of training.

Supplier Code of Conduct

Western University is committed to sourcing in an ethical, legally compliant, and socially responsible manner and expects suppliers to adhere to equivalent standards. The [Supplier Code of Conduct \(SCoC\)](#), implemented in May 2024, sets out the minimum ethical standards and business conduct for any supplier that provides the University with goods or services.

The SCoC was developed drawing insights from benchmarking against leading post-secondary institutions and cross-industry best practices. The standards set out in the SCoC address issues such as forced and child labour, fair treatment of employees, wages and benefits, worker health and safety, etc., that align with the International Labor Organization (ILO) and other applicable regulations such as the new [Supply Chains Act, Canada](#). The Supplier Code of Conduct is a key component for the relationship between Western and its suppliers to share the responsibility of meeting regulatory compliance, managing risks, and reputation.

Trademark Licensing and Fair Trade

Food and beverage and apparel have been identified as high-risk categories. Western's Hospitality and Food Services, and Retail Services (the Bookstore) have a history of practice related to ethical sourcing and reducing the risk of forced labour in supply chains.

For example, all residence dining operations, campus outlets, and vending services offer Fair Trade products, including coffee, tea, bananas, and chocolate. Hospitality and Food Services also prioritizes buying local, with tier one suppliers being predominantly located in Ontario.

Western's Dellelce Family Bookstore, managed by Western Retail Services, adopted Western's institutional Supplier Code of Conduct in 2024, and previously, have had a Code of Conduct with University licensees and their contractors since 2010. Both codes of conduct include, but are not limited to, establishing ethical principles, employment standards, and International Labour Organization practices for child labour and forced labour. This Code of Conduct helped to inform and develop Western's institutional Supplier Code of Conduct. The Bookstore's procurements are also integrated into Western's central Human Rights Due Diligence program.

The Bookstore works closely with the National Association of College Stores (NACS) and its network of members across North America to stay aware of potential issues and concerns in the industry. This vigilance is helping advance transparency and promote positive change to ethical principles and employment standards around the world. Additionally, on an annual basis, the Bookstore completes a trademark licensing review and report which is an opportunity to review supply chain issues relevant to the bookstore operations and incorporate findings into future action with suppliers and sourcing. The Bookstore will continue to collaborate with suppliers, advocacy groups and other universities to keep monitoring all industry issues.

Risk Assessment and Management

We recognize the risks of forced labour and child labour remain prevalent in supply chains and that we have a shared responsibility with our suppliers. To go beyond compliance and proactively strengthen monitoring and mitigation efforts, Western is developing a Human Rights Due Diligence (HRDD) program focused on forced labour and child labour. This system uses best-practice methodologies to map risks within the supply chain and outlines actionable steps for identified high-risk suppliers. These steps include ensuring acknowledgement of the SCoC, follow-ups, integrating discussions into supplier engagements, and identifying suppliers needing support to implement robust human rights standards and practices. In 2024, this process was systematically laid out with each step set to be implemented in the coming years, reinforcing Western's commitment to ethical and responsible supply chain practices.

Supplier Code of Conduct

The Supplier Code of Conduct is distributed to suppliers through the following methods:

- New supplier onboarding
- Purchase order terms and conditions
- Tendering opportunities (RFx documents)
- Contracts and agreements
- Direct outreach to contracted and high-risk suppliers

Leadership Assessment Questionnaire

To support the distribution of the SCoC to contracted, high spend, and/or high-risk suppliers, an environmental, social, governance & ethical Leadership Assessment Questionnaire is issued alongside the SCoC. The goals of this questionnaire include:

- Provide an overview of our commitments to responsible sourcing and the expectation we have of our supply chain
- Obtain information from suppliers about their practices and commitments, to help us identify risks & opportunities and improve our collective impact through partnerships, collaboration and learning, and
- Distribute Western's SCoC.

The questionnaire, in relation to the ethical and governance pillars of sustainability, includes questions pertaining to responsible management practices and human rights due diligence practices.

Sustainable Procurement Toolkit and Request for Proposal/Quote Processes

Supply chains and procurement hold significant potential for both positive and negative sustainability impacts. It is essential to emphasize the collective responsibility of every purchase, regardless of its scale. A decision-making toolkit is utilized for centrally managed procurements to streamline the process of identifying and integrating sustainability considerations into purchasing decisions, including Request for Proposals (RFPs).

The toolkit helps to identify where there may be a high risk for ethical supply chain practices, based on the product category or commodity, and provides suggested questions to assess and evaluate in an RFP. This may include requesting information on systems, policies, practices, or codes of conduct to ensure compliance with human rights standards within their supply chain and/or operations. Every RFP issued by central Procurement Services, in the reporting period, included mandatory ethical questions.

Training and Education

As a place of learning, we recognize our responsibility to raise awareness on the issue of modern slavery, and to educate, specifically, on modern slavery risks and best practices. Western Procurement Services has incorporated, at a high level, ethical supply chain management into internal employee training. Category-specific webinars were provided throughout 2024 and focused on risks and opportunities related to all pillars of sustainability, including ethical considerations. One session focused specifically on the risk of forced and child labour in supply chains and our responsibility to mitigate the prevalence in Western's supply chain.

Staff and Faculty Training

Planned for release in the first half of 2025, Western is developing a Modern Slavery online module for all staff and faculty involved in purchasing activities.

Overall learning objectives:

1. Understand the concept of modern slavery
2. Identify modern slavery risks in Western's supply chain
3. Western's ethical sourcing measures, including compliance with Canada's Supply Chain Act

The module will include practical steps to address these objectives. Module completion by staff members will be recorded and measured as a Key Performance Indicator.

Procurement Professional Staff Training – OUPPMA Collaborative Working Group

As part of our collective efforts, Western 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 will help Western's central Procurement Services team 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, with planned delivery for early 2025, offering targeted guidance on key aspects of human rights in procurement:

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.

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.

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.

Measuring Progress and Effectiveness

Key Performance Indicators

% of spend with Canadian suppliers

Approximately 88% of spend on all goods in scope of the Act is with Canadian businesses.

Supplier Code of Conduct

(As of March 22, 2025)

Acknowledgments and signatures:

466 suppliers (\$104 million in total spend)

Risk assessment mapping and supplier outreach, including addressing gaps and areas of risk, will continue as a fundamental element of our program.

Training

Completion of Modern Slavery training will be tracked and measured.

of reported modern slavery cases in our direct areas of influence:

0

of report cases resolved:

0

Benchmarking Assessment

A university benchmarking review was completed to evaluate Western's activities in comparison to our peers. The review included other universities located in Ontario, as well as global leading universities. Opportunities for improving our programs have been identified and have helped inform our action plan and priorities for 2025 and beyond.

Action Plan and Priorities – 2025 and beyond

Western's Sustainable Procurement program will continue to develop and incorporate best practices relevant to our sector. Future program development may include the following:

Risk Management and Audit Programs

Western University reserves the right to audit suppliers and request additional documentation to ensure compliance with all applicable laws and standards as set out in the SCoC. Procurement Services will review industry best practices, including available audit tools, and take steps to develop an audit program. A comprehensive audit program may include:

- Mapping the supply chain of high-risk suppliers
- Conducting risk assessments and further due diligence inquiries
- Utilizing a verifiable audit tool to identify suppliers with forced labour in their supply chain

Training Programs

As referenced in ***Training and Education***, building awareness and informed decision making for both central and decentralized procurement staff is a focus on 2025. In addition to the initial training being provided, a refresher module will be developed to maintain knowledge and awareness.

Remediation Measures

Western does not currently have an institution-wide procedure addressing remediation specifically related to loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities. For clarity, we have not identified any instances where this has been applicable. As part of continuous improvement to Western's program, we will review best practices and consider a remediation framework.

Upon being notified of a potential violation of the SCoC, Procurement Services will validate the non-compliance with due diligence procedures. In the event that a supplier is confirmed to be non-compliant with Western's SCoC, they will be issued a notice of non-compliance and expected to bring forth corrective actions within thirty (30) days of receiving the notice. Western shall have the option, at its sole discretion, to terminate the agreement with the supplier.

Approval for The University of Western Ontario

This report was approved by the Board of Governors on May 1, 2025.

Attestation for The University of Western Ontario

In accordance with the requirements of the Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains 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.

A handwritten signature in black ink, appearing to read 'Alan Shepard', with a stylized, cursive script.

Alan Shepard, President and Vice-Chancellor, May 2, 2025.

I have the authority to bind the University of Western Ontario.