

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, 2025, to April 30, 2026

Identification of a revised report: N/A

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Identification of reporting obligations in other jurisdictions: N/A

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.

In the 2024-2025 institutional data reporting period, the University employed 1,417 faculty members, 2,756 staff members, and welcomed approximately 41,000 full-time students¹. The University reported revenues of \$1.7 billion and had assets of \$5.2 billion in fiscal 2025².

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](#).

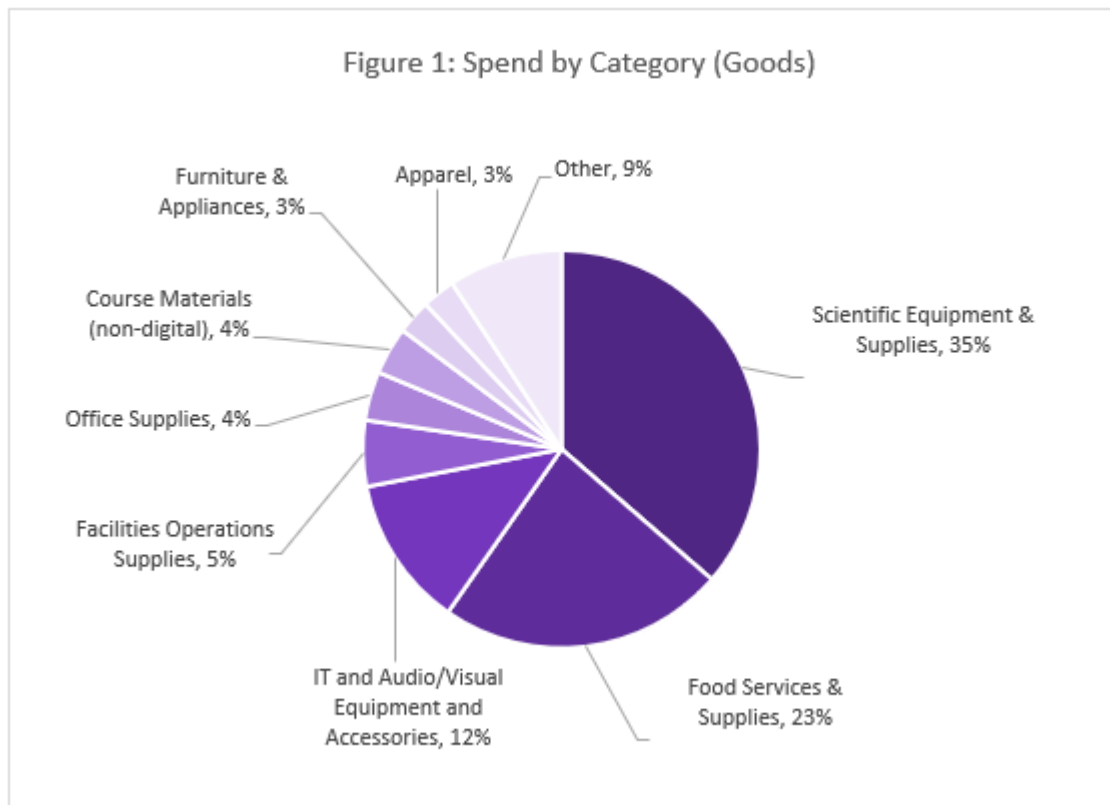
¹ Office of Institutional Planning & Budgeting <https://www.ipb.uwo.ca/institutional-data/institutional-data-dashboards.html>;
Summary of Enrolment <https://www.ipb.uwo.ca/db/student-enrolment/suepp.php>

² Western University Financial Statements https://www.uwo.ca/finance/forms/docs/corporate_accounting/2025.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 an increased risk of modern slavery, especially in secondary (and further) supply chain tiers, and in source materials used in the University's activities.

Category Spend

Western's spend on goods *in scope* of the Act during the reporting period was approximately \$91 million (Figure 1).



The following are identified as high-risk categories relevant to the University. The [U.S. Department of Labor report on 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)
- Promotional and Branded Merchandise

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 84% of spend on all goods *in scope* of the Act is with Canadian businesses, and 14% with suppliers in the United States. In compliance with the [Building Ontario Business Initiatives Act](#), effective in 2024, and the [\(U.S.\) Procurement Restriction Policy](#), effective in 2025, as well as navigating evolving tariff impacts, Western further prioritizes spending with Ontario and Canadian-based businesses. As a research-intensive university, spending with U.S. based suppliers may fluctuate from year to year, driven primarily by the procurement of specialized scientific equipment not available from Canadian businesses.

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 2024, sets out the minimum ethical standards and business conduct for any supplier that provides the University with goods or services.

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](#). To further ensure adherence to these standards, Western updated the SCoC in 2025 to clarify the University's right to conduct risk-based due diligence when credible concerns arise regarding supplier compliance, including the review of relevant documentation and direct engagement with the supplier to clarify and rectify incidences of non-compliance. 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.

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

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, a variety of Fair-Trade products—such as coffee, tea, bananas, and chocolate—are available across residence dining operations, campus outlets, and vending services. Hospitality and Food Services also prioritizes buying locally, 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. Excerpted from the 2026 report: Most Canadian apparel brands are covered under Bill S-211 (Fighting Against Forced Labour and Child Labour in Supply Chains Act) reporting requirements, but enforcement and meaningful action on forced/child labour risks remain limited. No prominent domestic labour violations have led to public sanctions, though supply chain transparency continues to be a major concern. 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's efforts include 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 2025, Western transitioned its risk assessment framework from development to active implementation. This was supported by the formalized SCoC due diligence procedure and the launch of a formal grievance mechanism to capture potential concerns. To execute this framework, Western continues to utilize its Leadership Assessment Questionnaire to evaluate supplier compliance. Furthermore, following a scan of audit tools and peer benchmarking, Western has begun integrating proactive risk management, leveraging public sources to monitor high-spend and higher-risk suppliers for human-rights.

Leadership Assessment Questionnaire

Western continues to issue the environmental, social, governance & ethical Leadership Assessment Questionnaire to contracted, high spend, and/or high-risk suppliers. 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. Data from these questionnaires helps Western identify emerging trends in supplier transparency and prioritize areas where targeted engagement is required.

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, during the reporting period, included mandatory ethical questions.

In 2025, Western enhanced this toolkit and strengthened supplier support by introducing two dedicated supplier-facing resources: Responding to Sustainability Questions in Bids and the Supplier Sustainability Expectations Guide. These resources are designed to help suppliers understand Western's ethical requirements and provide comprehensive evidence of their human rights' due diligence practices during the RFP process. Where sustainability criteria are applied, suppliers are required to provide appropriate validation or documentation, ensuring a transparent and evidence-based procurement process that aligns with Western's sustainability priorities.

Remediation Measures

Grievance Mechanism

Following a review of best practices and as a key step in developing our remediation framework, Western established a formal grievance mechanism in 2025, providing a channel for stakeholders to report potential SCoC or other human rights violations directly to Procurement Services.

Corrective Action Process

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 be expected to submit and implement a corrective action plan within thirty (30) days of receiving the notice. Consistent with Western's procurement contracts, Western shall have the option, at its sole discretion, to terminate the agreement with the supplier who fails to execute these plans.

Western does not have an institution-wide procedure addressing remediation specifically related to loss of income that results from any measure taken to eliminate the use of forced labour or child labour in its activities.

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 ethical supply chain management into internal employee training.

Staff and Faculty Training

In 2025, Western launched a Modern Slavery online training module available for all staff and faculty involved in purchasing activities.

Overall learning objectives:

1. Understand the concept of modern slavery, including forced labour and child labour.
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 includes practical steps to address these objectives. Module completion by staff members is recorded and measured as a Key Performance Indicator to assess the University's effectiveness in modern slavery risk awareness.

Procurement Professional Staff Training – OUPPMA Collaborative Working Group

As part of our collective efforts, Western continues to collaborate with the Ontario University Professional Procurement Management Association (OUPPMA) to advance a shared training framework aimed at addressing forced and child labour risks within university supply chains.

The objective of this framework is to enable procurement professionals with the knowledge and tools necessary to recognize and mitigate forced and child labour risks, support compliance with this Bill, and reinforce ethical procurement practices. The training emphasizes informed decision making, proactive stakeholder engagement, and clear supplier accountability.

In the previous reporting period, OUPPMA committed to a three-part training program that would deliver structured learning for procurement professionals on key forced and child labour considerations. The first module, which focused on “Awareness of Forced and Child Labour in Supply Chains”, was delivered in Spring 2025.

In the coming year, OUPPMA will continue developing advanced training and best practice resources for procurement professionals to support effective supplier engagement. This work, which has already begun, will emphasize proactive communication of expectations, risk identification and assessment, and how to treat high-risk purchases through public procurement practices.

Additionally, the Ontario university sector continues its strategic collaboration with [CASPAR](#)—a Canada-wide working group of procurement professionals dedicated to sustainable procurement—to share best practices and collectively strengthen efforts related to compliance across Canadian universities. During this reporting period, CASPAR has adapted its approach and re-aligned objectives and best practices to support sector-wide awareness, including the continued development of shared resources including an awareness video on human rights risks, modern slavery, and responsible supply chain management and responsible purchasing.

Measuring Progress and Effectiveness

Key Performance Indicators – As of March 2026

Spend with Canadian Suppliers

Approximately 84% of spend on all goods in scope of the Act is with Canadian businesses.

Supplier Code of Conduct

Acknowledgments and signatures:

- 964 suppliers (\$131 million in annual spend)

Training

Completion of Modern Slavery training:

- Over 100 staff and faculty members have completed Western’s formal online training module
- 100% procurement professionals have completed the OUPPMA delivered training

Risk Assessment and Management

Investigated cases of forced or child labour:

- # of investigated cases in our direct areas of influence: Nil
- # of investigated cases resolved: Nil

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

Action Plan and Priorities – 2026 and beyond

Western’s Sustainable Procurement program will continue to develop and incorporate best practices relevant to our sector. Based on the programs advanced in 2025, our priorities for 2026 and beyond 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 best practices, including available audit tools, and take steps to develop an audit program. A comprehensive audit program may include:

- Conducting risk assessments and further due diligence inquiries
- Utilizing a verifiable audit tool to identify suppliers with forced labour in their supply chain
- Exploring pilot initiatives to map supply chains beyond Tier 1 for selected high-risk categories, aiming to address visibility gaps in secondary tiers and source materials.
- Transitioning from ad-hoc monitoring to a systematic risk intelligence approach, utilizing the benchmarking insights to refine continuous oversight of high-spend and high-risk suppliers.

Training Programs

As referenced in ***Training and Education***, scaling and sustaining educational reach to a wider group of decentralized staff and faculty members involved in purchasing activities across the University is a focus in 2026.

Approval for The University of Western Ontario

This report was approved by the Board of Governors on April 30, 2026.

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.



Alan Shepard, President and Vice-Chancellor, May 20, 2026
I have the authority to bind the University of Western Ontario.