

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT (FORMERLY BILL S-211)

TRENT UNIVERSITY ANNUAL PUBLIC SAFETY CANADA REPORT

REPORTING PERIOD: MAY 1, 2025 TO APRIL 30, 2026

Introduction

Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act) includes an obligation that applies to defined entities to report on the measures taken to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains.

Trent University is a corporation that has a place of business in Canada and meets at least two (2) of the following conditions for at least one (1) of its two (2) most recent financial years and thus satisfies the definition of an entity:

- At least \$20 million in assets
- At least \$40 million in revenue
- Employing more than 250 employees

The University has a reporting obligation based on its activities that specifically applies to import of goods produced outside of Canada and therefore is submitting a report to the Ministry of Public Safety for the financial reporting period May 1, 2025, to April 30, 2026.

This report will address the mandated requirements as defined in subsections 11(1) and 11(3) of the Act and is accompanied by a signed attestation from Trent University’s applicable governing body. A questionnaire will be submitted in conjunction with the attested annual report.

Overview:

Reporting entity’s legal name:	Trent University
Financial reporting year:	May 1, 2025 to April 30, 2026
Identification of a revised report:	N/A
Business number	119268928
Identification of a joint report:	N/A
Reporting obligations in other jurisdictions:	N/A
Entity categorization according to the Act:	Entity (University)
Sector/industry:	Higher Education, Public Sector
Location:	Ontario, Canada

Annual Report

The objective of the University will be to ensure measures are taken to remediate any forced labour or child labour within its supply chains. Trent University commits to developing proactive interventions to prevent and reduce the risk of forced labour or child labour of goods imported into Canada and to enhance its supply chain transparency and ethical business practices in its supply chain management. Trent University is certified as a Fair-Trade Campus acknowledging international trade and business practices having an impacting approach to social and environmental sustainability.

The University has initiated a tracking document that overviews commodities of high ethical risk identifying:

- Product category
- Relevant ethical risk
- Countries of concern
- Relevant standards and certifications

The tracking document intends to create a list of product categories that provide guidance and industry standards information used as a reference tool for the Procurement Services staff. This information will assist in preparing tender requirements and criteria for bid evaluation and scoring purposes.

The University has contracted with several suppliers associated with product categories considered high risk as identified by the University's tracking document addressing their supply chain activities and seeking their documented mitigation strategies regarding their compliance with the Act.

The following is a sample overview of supplier management and risk assessment mapping initiated by the University for identified high risk procurement contracts:

Multi-Functional Devices – During this reporting period, the University contracted for office managed print services. The following were recognized by the awarded proponent:

- The Supplier ascertained having an Ethics and Compliance Program including a Code of Business Conduct and Business Ethics Policy.
- The Supplier particularized their audit protocols of their suppliers for compliance with international labour standards and due diligence guidance for responsible supply chains.
- Ethical business practice training and awareness provided for their staff.
- The Supplier noted continuous improvement strategies in which they review and renew internal standards and best practices on a continuous basis.

This agreement was a marketplace opportunity through a group purchasing organization of which compliance with the Act was identified and information on ethical supply chains was a mandatory requirement of the award.

Computing Devices – The University contracted for End-User Computing Products and Related Services through a GPO opportunity during this reporting period. The University

conducted a review with its prime supplier regarding its Statement Against Modern Slavery, Human Trafficking and Child Labour Policy and determined:

- Supplier is the founding member of the Responsible Business Alliance and has adopted its Code of Conduct prohibiting use of forced and child labour.
- Has a Supplier Principles Agreement to which its suppliers are expected to agree as a condition of doing business. Requirements and commitment include compliance with laws, regulations and international standards.
- Policies are in place that suppliers must adhere to including Human Rights Policy, Responsible Sourcing Policy and Vulnerable Worker Policy.

Mobility Cellular Services and Devices – The University’s contracted provider was audited regarding their demonstration of commitment to ethical principles. Their Supplier Code of Conduct Policy recognizes labour and human rights, ethics and business integrity and responsible sourcing of minerals. The provider may conduct supplier assessments and has monitoring protocols including third party audits and non-compliance measures.

Group Purchasing Organizations (GPOs) - Trent University utilizes marketplace opportunities and vendors of record (VORs) whenever feasible resulting in the execution of numerous customer service agreement commitments annually. The University has worked with its prime GPO to understand how they address the requirements of the Act in their procurement process ensuring supplier partners are supportive of the Act. Supply Chain Code of Conduct and Supplier Code of Conduct policies are in place that outline ethical and sustainable standards expected from all partners within their supply chain. The aim of these policies is to ensure that suppliers align with the GPO’s values, demonstrating a commitment to responsible practices in areas like labour rights, environmental stewardship, and governance. The guidelines aim to promote transparency, integrity, and accountability in all supplier relationships available to their membership.

Requirement (a) - Structure, activities and supply chains

Trent University, founded in 1964, is a Canadian corporation focused on post-secondary education that employs approximately 3,065 total employees. The University employees work in Canada and are subject to Canadian labour laws.

Trent University has a bicameral system of governance. The authority and responsibilities of the two governing bodies, the Board of Governors and the Senate, are delineated in the Trent Act. Both governing bodies are supported by the University Secretariat.

The Trent Act establishes that:

- The Board of Governors is the senior governing body responsible for overall management of the University, with particular responsibility for property, revenues and finance; and
- The Senate is the senior academic governing body responsible for overseeing the academic activities of the University.

Composition of the Board:

- President (Ex Officio)
- Chancellor (Ex Officio)
- Six seats on the Board are reserved for internal members that are appointed through a nominations and election process.
 - 2 Faculty
 - 2 Students
 - 2 Staff
- 12-18 Members of the external community (including at least 4 Trent Alumni)

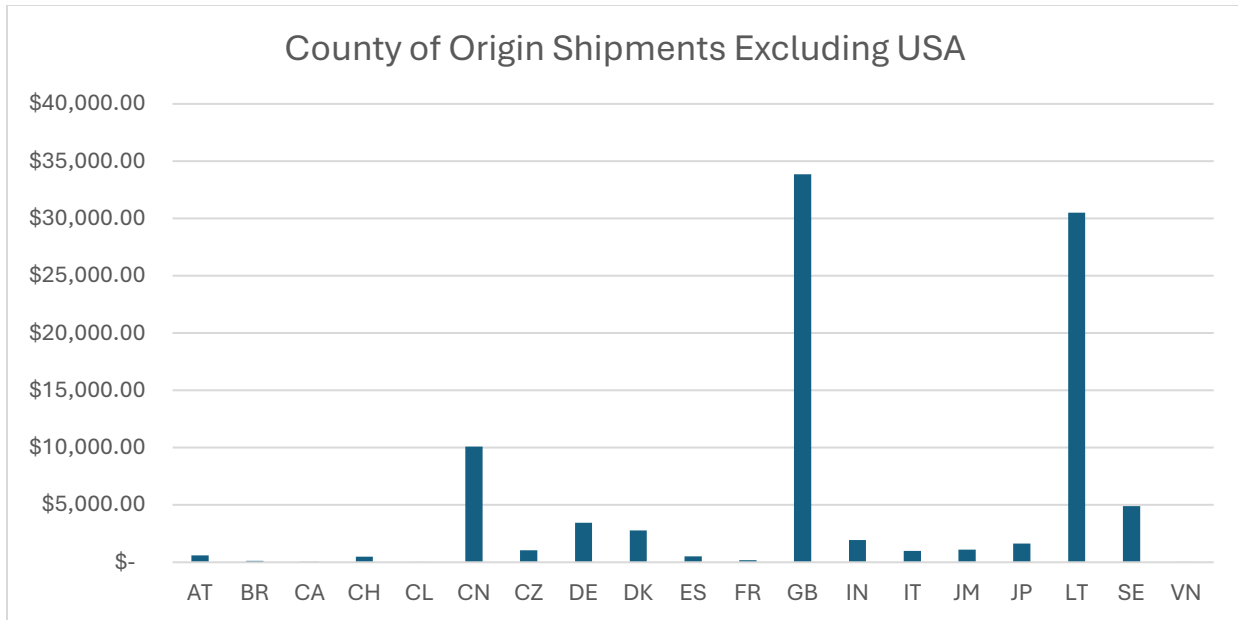
Trent University's Procurement Services department consisted of three (3) Procurement Officers, responsible for the procurement of goods and services for the University, one (1) Procurement Compliance Analyst reporting on and analyzing procurement activity and one (1) Director of Strategic Procurement and Compliance, responsible for providing strategic supply chain guidance in compliance with Broader Public Sector Directives, relevant legislation, and University policies.

Procurement requests are initiated through a requisition platform that is generated by the end users advising Procurement Services of the need to procure. Procurement Officers initiate the procurement based on policy defined processes. The University also has a corporate credit card program available for approved staff for low value dollar purchases. This program has commodity merchant category controls in place.

Trent University procures primarily from Ontario and Canadian-based suppliers. Advocating the use of Ontario and Canadian-based suppliers aims to minimize potential risk regarding the use of child or forced labour versus outsourcing to foreign or geographical high-risk suppliers.

The University does not produce goods (including manufacturing, extracting, growing, and processing) and has very minor dealings regarding importation of goods into Canada. The number of Trent University imports during 2025 was 265 shipments, with 40% of these shipments being from countries of origin outside of the United States per the following: AT, BR, CA, CH, CL, CN, CZ, DE, DK, ES, FR, GB, IN, IT, JM, JP LT, SE, VN.

The goods imported by the University are described as lab samples, reagents, lab equipment, lab consumables, equipment parts and books. The value of imported shipments was \$366,326.24 representing a minimal volume of approximately 0.61% of the total value of goods procured by the University (valued at over \$60M) during this reporting period.



Requirement (b) - Policies and due diligence processes

The landscape of public sector procurement is continually evolving. The University’s procurement policies provide the governance framework regarding the acquisition of goods and services ensuring fair, ethical and transparent procurement processes, upholding professional standards and incorporating legislative requirements.

The University’s *Procurement of Goods and Services Policy* establishes compliance with federal and provincial legislation and related regulations, as well as international trade agreements. The policy defines procurement governance and guidelines including delegative responsibilities of the University’s administration. The *Procurement of Goods and Services Policy* includes reference to the Act.

The University has a *Supply Chain Code of Ethics Policy* that establishes professional and ethical standards regarding responsible business conduct for procurement activities encompassing both internal clients (staff) and external representatives (suppliers).

Trent University’s *Supplier Code of Conduct Policy* is reflective of international labour standards. The policy’s objective is that suppliers will uphold the human rights of employees, communities, and vulnerable populations and ascertain human rights, prohibiting utilizing child labour, forced/involuntary/indentured labour and promoting supplier diversity. Suppliers shall act with integrity and in an ethical manner, in accordance with applicable laws and regulations. If a breach or non-compliance is determined, the policy affords the University to bring about compliance, including requiring remediation by the supplier or its subcontractors and/or termination of the contract. Embedded responsible business conduct is defined in the policy with the

objective of ceasing, preventing or mitigating adverse impacts. Overall, this policy promotes responsible business conduct that supports human rights in supply chains.

Trent University has a *Fair Trade Purchasing Policy for Apparel*. The purpose of the policy is to ensure that apparel manufactured for Trent University is made under humane working conditions in compliance with accepted international standards and local laws and to improve working conditions and labour practices in the apparel industry worldwide.

The University's *Policy on Environmental Sustainable Procurement* defines procurements related to food services and includes provisions to support the serving of local, organic and fair-trade food.

The University's *Purchase Order Terms and Conditions* is subject to the Act and suppliers must represent and warrant they will endeavor to prevent and reduce the risk of use of forced labour and child labour. The University's *Supplier Code of Conduct Policy* is referenced.

Requirement (c) - Forced labour and child labour risks

Trent University's Procurement Services has commenced the process of identifying activities and/or supply chains that carry risks and how supply chains could potentially contribute to risks that forced labour or child labour is used. Initial assessments included identifying suppliers in high-risk sectors, conducting outreaches to those suppliers to review their approach to mitigating risks of forced labour or child labour, and desk-based research when applicable. Identifying and engaging certain suppliers ensures discussions occur regarding expectations and compliance. Initiatives included creating a vendor database by collecting and storing modern slavery policies and/or statements and supplier standards for high impact procurements.

Implementation of a *Supplier Code of Conduct Policy* emphasizes the University's commitment to the Act and engages communications with suppliers regarding the University's expectations, encourages ethical supply chains and reduces the risk of forced labour and child labour regarding the University's procurements.

The University recognizes the potential risk of forced labour and child labour across its supply chains and acknowledges its sourcing is mainly from countries where these risks are low. Unfortunately, there can be risks within the multilayered supply chain tiers that lack visibility. Considerations to identify and address potential risks, where feasible, are ongoing by the University.

Requirement (d) - Remediation measures

The University is not aware of and has not identified forced labour or child labour instances in its supply chain activities. Therefore, no formal measures were taken this reporting period.

Requirement (e) - Remediation of loss of income

Trent University has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains.

Requirement (f) – Training employees

Trent University remains committed to enhancing awareness and understanding of the requirements under the Act. As part of this commitment, Trent University 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 equip university staff and procurement professionals with the knowledge and tools necessary to recognize and mitigate forced and child labour risks, support compliance with the Act, 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 will 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 created in 2025. In September, Trent University launched Module 1 with 100% of the Procurement team successfully completing their training for this Module.

During the past reporting year, OUPPMA developed a dynamic, online companion course as an alternative format to delivering this awareness training and broadened the target audience to include university staff and community members. This course is being released in phases which align with institutional training protocols and scheduling.

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 of the Act 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.

Requirement (g) - Assessing effectiveness

During this reporting period, the University initiated vendor outreach initiatives regarding targeted contracts with product categories of high ethical risk to determine their public policy and endorsement of the Act. Examples were referenced within this report that included multi-functional devices, computing devices and mobility cellular services and devices.

The objective is to review the supplier’s position and commitment to addressing and preventing the risk of forced labour and child labour globally. Supplier information such as modern slavery statements, policy documentation and supply chain standard manuals is being requested, reviewed and amassed by the Procurement Services department creating a reference repository. When engaging suppliers about their ethical business practices and initiatives, the feedback has been supportive of the Act.

The University’s suite of procurement policies and procedures have been updated in relation to the Act regarding forced labour and child labour. Regular reviews are conducted for all University governance documentation and will be monitored and adjusted accordingly.

The Procurement Services department plans to enhance its effectiveness in ensuring that forced labour and child labour are reduced or eradicated in its supply chains. Various focus initiatives are planned with anticipated tracking and performance indicators for incorporation in future reporting.


ACTIONABLE ACTIVITIES
➤ Targeted audits of contracted suppliers of high-risk geographies and product categories emphasizing the University’s expectations of its suppliers enforcing standards of the Act.
➤ Advancing socially responsible criteria in tendering events.
➤ Awareness-raising activities of university employees regarding responsible procurement and human rights.

Approval

This report was approved by the Board of Governors on May 8, 2026.

Attestation for Trent University

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Vice-Chair, Board of Governors, attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.

Full Name	Mike Lavallée
Title	Vice-Chair, Board of Governors
Date	May 8, 2026
Signature	 <i>I have the authority to bind Trent University</i>