

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, 2024 TO APRIL 30, 2025

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, 2024, to April 30, 2025.

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, 2024 to April 30, 2025
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.

During this reporting period, the University has begun developing a tracking document that overviews commodities of high ethical risk identifying:

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

The goal is to continue growing the tracking document to build a robust list of product categories that provides guidance and industry standards information that will be 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 per the University's tracking document. The Procurement Services team was tasked with addressing these identified suppliers regarding their supply chain activities and seeking their documented mitigation strategies regarding their compliance of 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 initiated this reporting period:

Food Service Management – during this reporting period, the University tendered and awarded a food service management provider who supplies all food, beverage and labour for the University. The RFP document embedded language requiring compliance with the University's Fair Trade certification. The University obtained from the top ranked proponent their Modern Slavery Statement and reporting that advised its governance in conducting its business. Further, a Code of Business Conduct protocol, a Human Rights Policy, a Supply Chain Integrity Policy and a Whistleblower Policy were in place at the time of the contract award and the documentation addresses the suppliers' standards and guidance identifying and mitigating the risks associated with forced labour and child labour.

Athletic Apparel – the University tendered and awarded an Athletic Apparel contract of which the RFP document embedded requirements regarding social and ethical business practices. The following were acknowledged by the awarded proponent:

- Supplier provided a Fair Labour Associate Licensee Certificate in their proposal response;
- Supplier detailed the vetting process of their suppliers for compliance with international labour standards and included a detailed list of their suppliers with links to those suppliers' CSR pages;
- Supplier has a Code of Conduct Policy;
- Supplier provides ethical business practice training and awareness for their staff;
- Supplier noted continuous improvement strategies in which they review and renew internal standards and best practices on a continuous basis.

Bookstore Operations - The University contracts an external supplier that operates a campus bookstore offering the sale of textbooks, course materials, promotional material and apparel to the University's students and staff. This contracted vendor has a Vendor Labour Code of Conduct and attestation process that identifies products only procured from vendors and manufacturers who maintain ethical labour standards for the employees. The majority of the products offered in the campus bookstore are procured from Canadian suppliers with a small portion being imported.

Group Purchasing Organizations (GPOs) - Trent University utilizes marketplace opportunities and vendor of records (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. The University's prime GPO procurement process addresses the Act as follows:

- I. Planning Stage – includes both supplier engagement and customer engagement.
- II. Development Stage - Bill S-211 requirements are included in the Qualification Stage of Evaluation as well as the Technical Stage depending on the importance of the Act for each of the projects. An article is also included in the Master Agreements for suppliers who identify as an entity under the Act to ensure compliance with the Act.
- III. Award & Launch Stage - Procurement Process Summary decks for each of the agreements launched outlining the list of suppliers who identify as an entity under the Act. If the importance of the Act for a project is higher, information on ethical supply chain, as well as being free from forced and child labour, will be a mandatory requirement that is listed in the deck.

Requirement (a) - Structure, activities and supply chains

Trent University, founded in 1964, is a Canadian corporation focused on post-secondary education that employs approximately 1,700 full and part-time employees. The University employees work in Canada and are subject to Canadian labour laws.

As one of Canada's top undergraduate universities, Trent was recognized during this reporting period in the Macleans ranking as follows:

- Ranked #2 in Canada for:
 - Overall reputation
 - Most Innovative
- Ranked #1 in Ontario for:
 - Highest Quality
 - Student Services
 - Faculty Awards
 - Medical Science Grants

Across two campuses in Peterborough and Durham Greater Toronto Area, Trent attracts excellent students and faculty from across the country and around the world.

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)

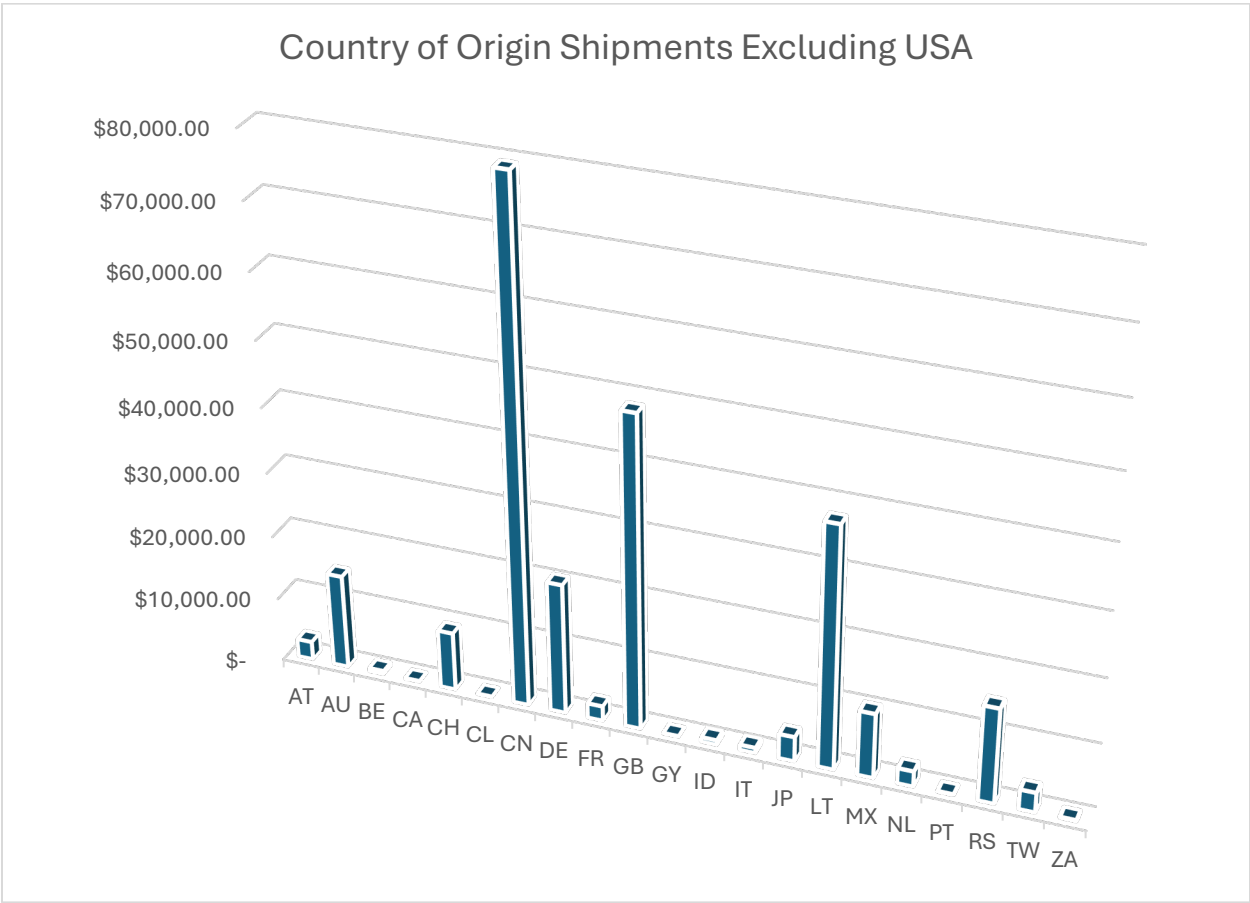
During this reporting period, Trent University's Procurement Services department consisted of three (3) Procurement Officers, responsible for the procurement of goods and services for the University, and one (1) Director of Strategic Procurement & Compliance, responsible for providing strategic supply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

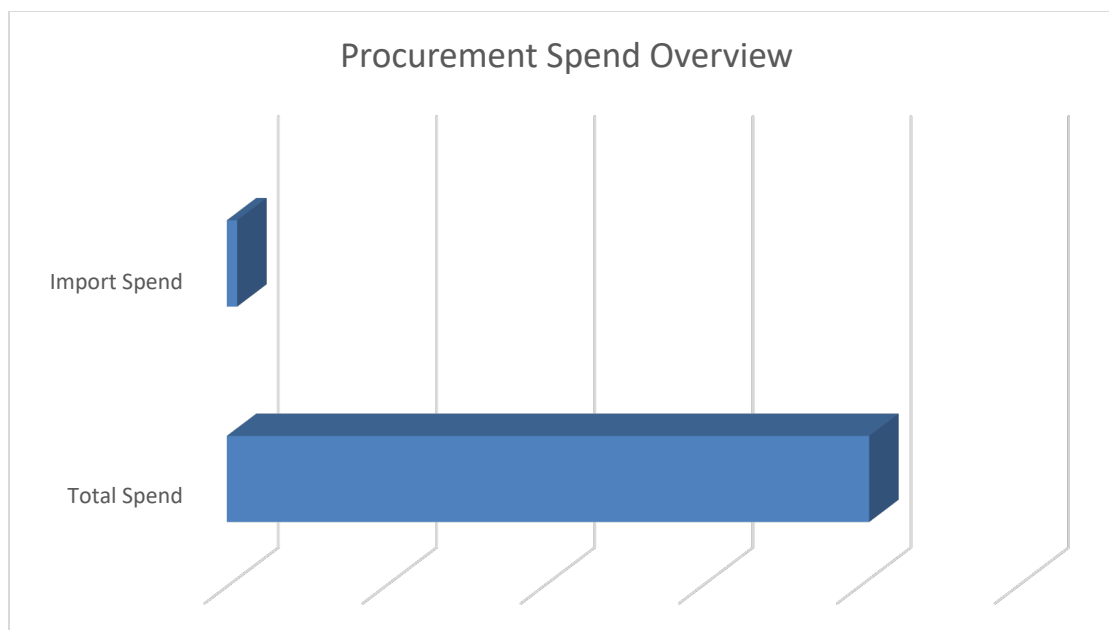
Procurement requests are initiated through a requisition platform that is generated by the end users advising Procurement Services of the need to procure. Procurement Officers initiate the procurement based on policy defined processes. The University also has a corporate credit card program available for approved staff for low value dollar purchases that has limited availability for international procurements and 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 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 2024 was 346 shipments with 42% of said shipments being from countries of origin outside of the United States per the following: AT, AU, BE, CH, CL, CN, DE, FR, GB, GY, ID, IT, JP, LT, MX, NL, PT, RS, TW, ZA.

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 \$309,277.83 representing a minimal volume over the total value of goods procured by the University in the last year.





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* was updated this reporting period to include 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).

During this reporting period, the University implemented a *Supplier Code of Conduct Policy* reflective of international labour standards. The policy 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 the use of any measures at its disposal 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. Trent has included language regarding the policy and ethical business expectations in its tendering templates. The policy is applicable for contracted agreements with the University and as agreed to by both parties at the time of contract execution. Overall, the implementation of 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* were refreshed in 2024 adding a notation that Trent University is subject to the Act and that suppliers 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, but there are still gaps in our assessments and the need to increase understanding of human rights risks and overall effectiveness of supply chain due diligence. Initial assessments included identifying suppliers in high-risk sectors and conducting outreaches to those suppliers to review their approach to mitigating risks of forced labour or child labour. 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 and contracts.

Various procurement policies have been revised or implemented to support the Act during this reporting period. 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

Procurement Services at Trent University is committed to increasing awareness of the requirements under Bill S-211. As part of this effort, we are 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:

- i. **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.
- ii. **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.
- iii. **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 initiatives are expected to launch in 2025, with rollout plans to follow.

Requirement (g) - Assessing effectiveness

During this reporting period, the University has begun vendor outreach initiatives regarding product categories of high ethical risk to determine their public policy and endorsement of the Act. The objective of the outreach 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 are 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 or newly created in relation to the Act regarding forced labour and child labour. Regular reviews are conducted for all governance documentation and will be monitored and adjusted accordingly. Further, the University's procurement tendering templates, form of agreement templates and purchasing order terms and conditions have been updated addressing the Act and the University's expectation of suppliers and that of their subcontractors who provide goods and/or services to the University.

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	
➤	Conduct targeted audits of contracted suppliers of high-risk geographies and product categories. The objective is to strengthen and enhance social supply chain disclosures ensuring commitment against forced labour and child labour and the University's expectations of its suppliers enforcing standards of the Act.
➤	Continue to develop and incorporate socially responsible criteria in tendering events addressing fair trade and labour standards and practices, scoring parameters and information collection on how suppliers protect human rights that promote responsible supply chain management.
➤	Enterprise-wide awareness and training of University employees regarding forced and child labour relating to the Act.
➤	Targeted training of the University's procurement professional staff regarding the Act and its impacts regarding supplier selection processes.

Approval

This report was approved by the Board of Governors on May 9, 2025

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 attest that I have reviewed the information contained in the report on behalf of the governing body of the entity, Trent University. 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 period listed within this report.

Full Name	Doug Kirk
Title	Chair, Board of Governors
Date	May 9, 2025
Signature	 I have the authority to bind Trent University