

To Whom it May Concern:

I hereby do certify the following is an excerpt from the public minutes of the Board of Governors meeting held on May 8, 2024:

Board of Governors Public Meeting – May 8, 2024

“That based on Report BOG-2024-40, the Bill S-211 annual report for fiscal year April 1, 2023 – March 31, 2024, and associated questionnaire be approved and submitted to the Minister of Public Safety and Emergency Preparedness by May 31, 2024.”



Melissa Pringle
Board Secretary
May 16, 2024



Bill S-211: Forced Labour and Child Labour in Supply Chains Act

Annual Report

April 1, 2023 – March 31, 2024



Reporting for entities

1. *What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Required)

- Mapping activities
- Mapping supply chains
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Developing and implementing an action plan for addressing forced labour and/or child labour
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- Developing and implementing child protection policies and processes
- Developing and implementing anti-forced labour and/or -child labour contractual clauses
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Auditing suppliers
- Monitoring suppliers
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
- Developing and implementing grievance mechanisms
- Developing and implementing training and awareness materials on forced labour and/or child labour
- Developing and implementing procedures to track performance in addressing forced labour and/or child labour
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour
- Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks
- Information not available for this reporting period
- Other, please specify:

2. Please provide additional information describing the steps taken (if applicable) (1,500 character limit).

- Over the last fiscal year, we began compiling a comprehensive list of all suppliers we directly purchase goods from outside of Canada.
- We will contact each identified supplier outside of Canada to affirm its commitment to ethical sourcing practices, specifically regarding forced and child labor, request written attestations from suppliers affirming non-engagement or support of forced labor or child labor.
- We will continue to collaborate with industry peers by engaging with other colleges, universities, and relevant industry associations to share best practices, collaborate on ethical sourcing initiatives, participate in industry working groups or forums dedicated to addressing issues related to forced labor and child labor.
- We will integrate the outcomes of supplier mapping, attestations, and due diligence processes into the college's procurement policies and procedure, ensuring that ethical sourcing considerations are embedded throughout the procurement lifecycle, from supplier selection to contract management.

3. *Which of the following accurately describes the entity's structure? (Required)

- Corporation
- Trust
- Partnership
- Other unincorporated organization

4. *Which of the following accurately describes the entity's activities? Select all that apply. (Required)

- Producing goods (including manufacturing, extracting, growing and processing)
 - in Canada
 - outside Canada
- Selling goods
 - in Canada
 - outside Canada
- Distributing goods
 - in Canada
 - outside Canada
- Importing into Canada goods produced outside Canada
- Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

5. Please provide additional information on the entity’s structure, activities and supply chains (1,500 character limit).

Durham College is defined as a corporation without share capital and consisting of the members of its board of governors. Durham College has policies, processes, and structures in place to promote effective operation of the college to allow it to fulfill its mandate and meet its objectives.

As a college we follow the Broader Public Sector Procurement Directive. We import goods into Canada from outside the country to meet various operational needs. We procure laboratory equipment such as specialized instruments, chemicals, and supplies internationally to support our science and research departments. Additionally, we import technology and electronics such as computers, software, and audio-visual equipment from global manufacturers to aid in administrative functions, classrooms, and student services. We also source maintenance supplies, equipment parts, and facilities management materials from global suppliers to ensure the proper upkeep of our campus buildings and grounds. These imports are essential for maintaining the high standards of education and services we provide for our students and staff.

The Campus Store currently sells apparel and sundry supplies which are purchased from Canadian vendors and distributors. A very small percentage of textbooks are purchased from independent US publishers who have no Canadian distributor due to their small size.

6. *Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

- Yes
- No

6.1 *If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate

7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500 character limit).

To enhance our policies and due diligence processes regarding forced and child labor, Durham College will:

- Revise the Procurement Policy & Procedure to require validation of suppliers outside Canada for compliance with forced and child labor standards. The definition of 'child' will encompass legal definitions and the minimum age for employment in respective countries.
- Update the supplier setup process to mandate self-attestation from all suppliers outside of Canada, confirming non-utilization of child or forced labor in their supply chains.
- Amend purchase order terms & conditions and competitive tendering documents to explicitly state that suppliers and subcontractors must refrain from engaging in or supporting child labor or any form of forced labor, such as indentured labor, bonded labor, or involuntary labor of prisoners.

8. *Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)

- Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.
- Yes, we have started the process of identifying risks, but there are still gaps in our assessments.
- No, we have not started the process of identifying risks.

8.1 *If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Required)

- The sector or industry it operates in
- The types of products it produces, purchases or distributes
- The locations of its activities, operations or factories
- The types of products it sources
- The raw materials or commodities used in its supply chains
- Tier one (direct) suppliers
- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour
- The use of forced labour
- The use of child labour
- None of the above
- Other, please specify

9. *Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Required)

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- None of the above
- Other, please specify

10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit).

Not applicable

11. *Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)

- Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.
- Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

11.1 *If yes, which remediation measures has the entity taken? Select all that apply. (Required)

- Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support
- Compensation for victims of forced labour or child labour and/or their families
- Actions to prevent forced labour or child labour and associated harms from reoccurring
- Grievance mechanisms
- Formal apologies
- Other, please specify.

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).

Not applicable

13. *Has the entity taken any measures to remediate the 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 and supply chains? (Required)

- Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.

- Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

14. Please provide additional information on any measures the entity has taken to remediate the 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 and supply chains (if applicable) (1,500 character limit).

Not applicable

15. *Does the entity currently provide training to employees on forced labour and/or child labour? (Required)

- Yes
- No

15.1 *If yes, is the training mandatory? (Required)

- Yes, the training is mandatory for all employees.
- Yes, the training is mandatory for employees making contracting or purchasing decisions.
- Yes, the training is mandatory for some employees.
- No, the training is voluntary.

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit).

No training required

17. *Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Required)

- Yes
- No

17.1 *If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Required)

- Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour
- Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
- Partnering with an external organization to conduct an independent review or audit of the organization's actions
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators
- Other, please specify.

To assess the effectiveness of its policies and procedures regarding forced labor and child labor, Durham College will implement the following measures:

- Establish a schedule for periodic reviews or audits of the organization's policies and procedures related to forced labor and child labor. This ensures ongoing compliance and identifies areas for improvement.
- Work closely with suppliers to assess the effectiveness of their actions in addressing forced labor and child labor. This can involve tracking supplier performance indicators related to labor practices and collaborating on improvement initiatives.

18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).

Durham College will assess its effectiveness in preventing forced and child labor by:

- Incorporating language and evaluation criteria into public tendering opportunities, especially in cases of elevated risk, to examine vendors' supply chain activities as part of the selection process.
- Including a strict adherence clause in agreements with suppliers, mandating the avoidance of child and forced labor in their supply chains. Breaching this clause may result in financial penalties or termination for cause.
- Actively investigating vendors from outside Canada with elevated risk by conducting internal investigations using web resources and requesting attestations from vendors affirming non-engagement or support of child and forced labor.
- Utilizing OECM (Ontario Education Collaborative Marketplace) and MGCS (Ministry of Government and Consumer Services) vendor of records whenever possible. These vendors have measures in place to address forced labor and child labor within their competitive tendering processes, providing additional assurance of ethical sourcing practices.

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 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.

Dr. Elaine Popp
Durham College President

I have the authority to bind Durham College.