

Fighting Against Forced Labour and Child Labour in Supply Chains Act (former Bill S-211)

Trent University Annual Report

Reporting Period January 1, 2023, to December 31, 2023

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 the conditions of at least \$20 million in assets, at least \$40 million in revenue, and it employs more than 250 employees. As a result, Trent University is submitting a report to the Ministry of Public Safety, as required by the Act as an applicable entity, reflective of the financial reporting period January 1, 2023, to December 31, 2023.

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 approval and attestation from Trent University's applicable governing body. A completed questionnaire will be submitted in conjunction with the attested annual report.

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11 (1) The steps the entity has taken during its 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.

For this reporting period, Trent University has minimal defined practices in place but anticipates expanding on its proactive measures annually. For instance, Purchasing Services is planning to incorporate a strategy of risk assessments to increase understanding of human rights risks and overall effectiveness of supply chain due diligence. Assessments may include defining suppliers located in geographies with known human rights violations, identifying high-risk sectors such as food and apparel, and conducting outreaches to new and existing suppliers the University procures from to review their approach to mitigating risks of forced labour or child labour.

The objective of the University will be to ensure measures are taken to remediate any forced labour or child labour within our supply chains. Trent University intends to develop and grow 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. Various activities will be conducted to ensure proactive measures are incorporated into the University's procurement activities.

11 (3) (a) Its structure, activities and supply chains

Trent University is a Canadian corporation focused on post-secondary education that employs 1,697 full- and part-time employees. Trent University is located in Peterborough, Ontario with a satellite campus in Oshawa, Ontario.

During this reporting period, Trent University's Purchasing Services department consisted of two (2) Purchasing Officers responsible for the procurement of goods and services for the University and one (1) Manager overseeing the Purchasing Officers.

Procurement requests are initiated through a requisitioning platform that is generated by the end users advising Purchasing Services of the need to procure and the Purchasing Officers initiating the buy based on policy defined processes. The University also has a corporate credit card program available for approved staff for low value dollar buys that has limited availability for international procurements and has commodity merchant category controls in place.

The University does not produce goods (including manufacturing, extracting, growing, and processing) and has very minor dealings regarding importation into Canada. The number of Trent University imports during this reporting period was 289 shipments with 40% of said shipments being from countries of origin outside of the United States per the following: AR, AU, BZ, CN, CZ, DE, DK, FR, GB, JP, KR, MN, TW. These imports are described as lab samples, reagents, lab equipment, lab consumables and equipment parts. The total value of imported shipments was \$590,624.56.

11 (3) (b) Its policies and due diligence processes in relation to forced labour and child labour

Trent University has a Fair Trade Purchasing Policy for Apparel that was effective during this reporting period. 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 is drafting a Supplier Code of Conduct Policy anticipated to be approved and effective later this year. The policy objective will be that Suppliers shall 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 at all times act with integrity and in an ethical manner, in accordance with applicable laws and regulations.

Management of the policy, if a breach or non-compliance is determined, affords the University 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.

The policy will be applicable for contracted agreements with the University and as agreed to by both parties at the time of contract execution.

11 (3) (c) The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.

During this reporting period, the University initiated a tracking form that overviews categories of products of high ethical risk that includes product categories, relevant ethical risk, countries of concern, and relevant standards and certifications. The goal is to continue growing the document and building a robust list of product categories that identify sources of information, per category, providing links to guidance and industry standards information that will be used as a reference tool in the Purchasing Services Department for future procurements. This information will assist in preparing tender documentation and the requirements, including criteria for scoring purposes.

11 (3) (d) Any measures taken to remediate any forced labour or child labour.

Not applicable currently as we have not identified any forced labour or child labour in our activities and supply chains.

11 (3) (e) Any measures 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.

Not applicable currently as 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.

11 (3) (f) The training provided to employees on forced labour and child labour.

The Purchasing Services team has been socialized with the requirements of the Act and attended the Public Safety Canada Supply Chains Act Information Session. Trent University Purchasing Services is a CCSP member and attends sessions relevant to discussions about the Act and relevant ethical supply chain initiatives. Purchasing Services anticipates further training in forced labour and child labour per supply chain is needed and intends to review opportunities as they become available.

An intensive review of the Purchasing Services website will be conducted to update information on the Act and provide educational information regarding forced labour and child labour for its clients.

11 (3) (g) How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

For this reporting period, Trent University has minimal defined practices but anticipates expanding on assessing its effectiveness annually.


During this reporting period, the University has begun vendor outreach initiatives regarding product categories of high ethical risk to determine public policy and endorsement of the Act. The objective of the supplier outreach is to review the supplier's position and commitment to addressing and preventing forced labour and child labour globally. Supplier information such as modern slavery statements, policy documentation and supply chain standard manuals are being requested and reviewed by the Purchasing Services department.

Trent University plans to enhance its effectiveness in ensuring that forced labour and child labour are reduced or eradicated in its supply chains and plans to incorporate the following activities through the Purchasing Services department:

- Periodic auditing of contracted suppliers of high-risk geographies and product categories to strengthen and enhance social supply chain disclosures ensuring international commitment against forced labour and child labour.
- Develop and incorporate socially responsible criteria in tendering events when applicable to include fair trade/labour standards and practices. This includes scoring parameters and information collection including; how suppliers protect human rights and policies and practices that promote responsible supply chain management.
- Working with Group Purchasing Organizations (i.e. OECM) regarding vendor of record arrangements to ensure their assessment and award of market opportunities recognizes the requirements of the Act prior to commitment by the University.

Attestation:

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 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.

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| Name | Douglas Kirk |
| Title | Acting Chair of the Board of Governors |
| Date | May 10, 2024 |
| Signature |  <i>I have the authority to bind Trent University</i> |