



PURPOSE

This annual report for the 2024 reporting year has been created by St. Clair College of Applied Arts and Technology (the “College”) for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “Act”).

OUR COMMITMENT

The College continues its commitment to preventing and reducing the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, including goods that the College imports into Canada.

CATEGORIZATION, SECTOR, AND INDUSTRY

The College is an entity under the Act

The College is a public College of applied arts and technology and is one of 24 public Colleges in Ontario operating in the educational services industry. Its campuses across Windsor and Chatham are home to over 11,000 full-time post-secondary students studying in over 120 programs in the areas of health sciences, community studies, engineering technology, skilled trades, information technology, and business.

In terms of the Act’s threshold requirements, the College has at least \$20 million in assets for at least one of its two most recent financial years, it has generated at least \$40 million in revenue for at least one of its two most recent financial years, and it employs an average of at least 250 employees for at least one of its two most recent financial years.

Our Operations

The College operates in the post-secondary educational services industry and educates over 11,000 full-time post-secondary students annually. The College sells goods directly in Canada and imports goods into Canada that are produced outside of Canada that are utilized for various academic programming, its on-campus bookstore, St. Clair College Regional Training Centre, third party online apparel store, on-campus clothing pop-up kiosks, and kit/materials provided to students for academic purposes. Additionally, at the St. Clair College Regional Training Centre, tooling components and fixtures are produced for industry partners.



STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Our Supply Chain

The College is a publicly funded Crown Agency that administers post-secondary and continuing education programs and apprenticeships. Pursuant to this, the College is involved in importing on a minimal basis. The College sources goods including but not limited to apparel and related products, classroom and lab supplies, furniture, information technology, and various office supplies from both domestic and global suppliers. Most of the goods sourced by the College are purchased from suppliers in Canada.

Steps Taken by the College in 2024

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, or of goods the College imported into Canada, the College conducted an internal assessment of the risks of forced labour and/or child labour in its activities and supply chain. The College also engaged an external consultant to assess the risks of forced labour and/or child labour and developed an action plan to address these issues within its operations and supply chain. For example, import and supplier data for goods were gathered and mapped to identify high risk suppliers.

The College also developed, implemented, and maintained due diligence policies and procedures for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the College's activities and supply chain:

- a) A Supplier Code of Conduct (the **"Code"**) was established and implemented. The Code sets clear expectations for the College's suppliers regarding the prohibited use of forced labour and child labour. The Code also outlines specific requirements for ethical labour practices and mandates adherence to the Act. Suppliers are required to sign and comply with the Code before entering into a supplier relationship with the College. The Code grants the College the right to audit suppliers, the right to request additional documentation to ensure compliance with applicable laws and standards (including the Act) and the right to discontinue business with suppliers who are not responsive to requests to address concerns around workplace practices, or who are not compliant with applicable laws and standards.
- b) The College's standard form contract (the **"Contract"**) has been updated to include specific clauses outlining the responsibilities of suppliers. The Contract requires compliance with all applicable laws and entitles the College to terminate for any breach of applicable law, the Act, or the Code. The Contract contains a "prohibition against forced and child labour" clause, which explicitly contains a contractual prohibition against the use of forced labour and child labour within the signatories' supply chain. Additionally, the Contract grants the



College the right to audit the signatory (including through the use of a third-party) to ensure compliance with applicable laws and the Act. Signatories to the Contract are also obligated to review and comply with the terms set forth in the Code.

- c) The College's standard Request for Proposal ("RFP") form that is used for open-bid procurement processes with third party vendors, maintains that the College reserves the right to disqualify or cease business with any party who breaches or has breached any applicable laws. The RFP form has been updated to include terms that prohibit the use of forced labour and/or child labour within a supplier's business or supply chain. Additionally, any proposal from suppliers suspected of using or being complicit in forced labour and/or child labour practices will be disqualified from a procurement process.
- d) The College has implemented training for key staff to raise awareness of forced labour and child labour risks in the supply chain. The training documentation assists key staff in identifying potential indicators of forced or child labour, understanding the legal and ethical implications, and taking appropriate action when concerns arise.
- e) The College's Purchasing Procedure Policy has been updated to include specific expectations for supplier conduct related to complying with the Act. The policy requires suppliers to comply with all applicable laws and regulations, including all applicable employment standards, international conventions, and the Act. The Purchasing Procedure Policy also prohibits suppliers from utilizing child labour and forced labour in its organization, on its premises, or throughout its supply chain.
- f) The College has updated its Purchasing Card Policy to prohibit cardholders from purchasing goods from any suppliers both inside and outside of Canada that employ or are reasonably expected to be employing forced labour and/or child labour as defined by the Act.
- g) The College has strengthened its grievance mechanisms through the implementation of a Whistleblower Policy. This policy encourages the confidential reporting of any perceived or suspected unethical or illegal behaviour, including forced and child labour as defined by the Act. All reports will be treated with confidentiality, and individuals making disclosures will be protected from retaliation or reprisal by the College or any representative acting on its behalf.



POLICIES AND DUE DILIGENCE PROCESSES

The College's Policies and Processes

The College maintained, implemented and developed several policies and processes which continue to affirm its commitment to abiding by applicable forced labour and child labour laws, including:

- a) All College employees and volunteers who work with children or other vulnerable people are required to undergo a criminal record check which verifies the individual's date of birth. This helps verify that no workers are under Ontario's legal working age.
- b) The College's Recruitment and Selection Policy maintains hiring practices and procedures that are consistent with the requirements of applicable employment and labour legislation. Additionally, the College's onboarding process requires new employees to provide multiple pieces of government ID for verification of the age and other information provided by the employee.
- c) The College's Purchasing Card Policy ensures that those with access to the College's credit cards retain receipts and provide justification for business card transactions. This permits the College to verify the vendors that do business with the College. The College's Travel, Meal and Hospitality Policy contains similar requirements for receipts and justification.
- d) The College utilizes vendor-of-record arrangements through the Ontario Education Collaborative Marketplace and the Ontario Ministry of Public and Business Service Delivery. Standard form contracts used in its dealings with suppliers through these arrangements hold suppliers contractually accountable for doing business within the requirements of all forms of applicable law.

FORCED LABOUR AND CHILD LABOUR RISKS

The College views the risk of forced labour and child labour in its supply chains to be low on an overall assessment, with the understanding that there are specific areas the College may import from where forced and/or child labour may be more prevalent.

The mitigation measures implemented by the College reflect a comprehensive and proactive approach and highlight a commitment to enhanced due diligence. The policies and procedures in place such as the College's Purchasing Procedure, the Supplier Code of Conduct, and the standard form contract aid in mitigating use of forced labour and child labour by suppliers (including those identified as high risk) and enables the College to end business relationships on that basis.



REMEDATION MEASURES

The College has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

REMEDATION OF LOSS OF INCOME

The College 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. As such, it has not undertaken any remediation measures related to income loss.

TRAINING PROVIDED TO EMPLOYEES

During the 2024 reporting year, the College implemented training for key staff to raise awareness of forced labour and child labour risks in the supply chain. The training was developed by an external consultant and underwent an internal review process to ensure alignment with the Act and internal policies and procedures. The training was mandatory for key staff involved in making contracting or purchasing decisions and provided an understanding of the Act and its purpose, an overview of the issues surrounding forced labour and child labour, tools to identify forced labour and child labour in the College's supply chain, and methods to mitigate risk of forced labour and child labour in the College's supply chain through reporting protocols in place. Additionally, the training included scenarios accompanied by detailed responses outlining the appropriate actions for each situation. The training was integrated into the existing Learning Management System ("LMS"), enabling the College to track participant completion and ensure compliance. Key staff were required to confirm, through the LMS, that they had reviewed and understood the training material.

ASSESSING EFFECTIVENESS

The College currently does not have specific policies and procedures in place to assess the effectiveness of these control measures; however, it will be considering what methods of assessment may be appropriate in the future.

The College recognizes the essential role of reviewing policies and procedures to ensure the maintenance of high standards of conduct. All College policies, and any related process or protocol documents, must be reviewed for accuracy and relevancy, and updated when necessary. At a minimum, all posted policies require a mandatory review every five years from the last date of review.

As outlined above, the College's Purchasing Procedure Policy, Supplier Code of Conduct, RFP form, standard form contract, Purchasing Card Policy, criminal record checks, and Recruitment and Selection Policy reduce the risk that child labour and/or forced labour is present in the College's activities and

