

PURPOSE

This annual report for the 2025 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.

ORGANIZATIONAL STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

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 9,000 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 9,000 full-time post-secondary students annually. In support of its academic programming and campus operations, the College sells goods directly within Canada and imports goods produced outside of Canada for use in various areas, including academic programming, the on-campus bookstore, a third-party online apparel store, on-campus clothing pop-up kiosks, and kit materials provided to students for academic purposes.

Our Supply Chain

The College is involved in importing on a minimal basis and 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.

As a designated Broader Public Sector (BPS) organization in Ontario, the College conducts all procurement activities in accordance with the policies, directives, and ethical standards established for publicly funded institutions. These requirements ensure that procurements are carried out with



personal integrity and professionalism, accountability and transparency, and compliance and continuous improvement.

POLICIES AND DUE DILIGENCE PROCESSES

In 2025, the College 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) The College continues to maintain a Supplier Code of Conduct (the "**Code**"), which sets clear expectations for the College's suppliers regarding the prohibited use of forced labour and child labour. The Code 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. To ensure ongoing alignment with the College's expectations, suppliers are required to re-sign the Code every two year, to reaffirm their commitment to its standards. 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 continues to use the standard form contract (the "**Contract**") which includes 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 includes 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. The RFP form has been updated to include an eligibility schedule that supports the Province of Ontario's Procurement Restriction Policy, which aims to restrict United States (U.S.) businesses from accessing public sector procurements in Ontario. Suppliers are required to disclose whether they qualify as a U.S. Business as defined in the policy. This additional screening enhances the College's due diligence process by increasing transparency regarding the jurisdiction in which the supplier operates.

- d) The College continues to request suppliers to identify whether they are an Ontario or Canadian business in accordance with the *Building Ontario Businesses Initiative Act, 2022* (the “BOBI Act”). Prioritizing the use of Canadian suppliers, with supply chains located within Canada, serves as an important risk-mitigation measure for the College. Suppliers operating in Canada are subject to strong labour protections and regulatory oversight. Collecting this information supports the College in applying the provincial preference framework established under the BOBI Act, and enhances transparency regarding supplier location, ownership, and regulatory oversight.
- e) The College updated the buying policies within its primary Online Marketplace Platform Service to support ethical procurement and reduce supply chain risks. These policies ensure that products originating from regions outside of Canada are flagged and identified. Key staff are notified when an item has been flagged, enabling them to avoid higher-risk products where possible. In addition, the College has established preference settings within the platform that prioritize Canadian sellers wherever possible.
- f) The College continues to deliver training to key staff to raise awareness of forced labour and child labour risks in the supply chain. The training documentation supports key staff in identifying potential indicators of forced or child labour, understanding the legal and ethical implications, and taking appropriate action when concerns arise.
- g) The College continues to enforce its Purchasing Procedure Policy which includes 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.
- h) The College continues to apply 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.
- i) The College continues to maintain its grievance mechanisms through its 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.

STEPS TAKEN BY THE COLLEGE IN 2025

In 2025, the College also continued to take steps 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 ensures that 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 has conducted an internal assessment, and has engaged an external consultant, to identify any risks of forced or child labour in its supply chain. No particular risks were identified.

REMEDIATION 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.

REMEDIATION 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 2025 reporting year, the College maintained training for key staff to raise awareness of forced labour and child labour. 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 remains mandatory for key staff involved in making contracting or purchasing decisions and provides 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,

