

Bill S-211, the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Structure, Activities and Supply Chain

Confederation College has been serving the citizens of northwestern Ontario since 1967, meeting the educational needs of students in a catchment area of some 550,000 square kilometres. Along with its main campus in Thunder Bay, Confederation College has seven regional sites located in Dryden, Fort Frances, Greenstone, Kenora, Marathon, Sioux Lookout and Red Lake, as well as a growing Distance Education division. Confederation College's catchment area includes 88 Indigenous communities, and our eight campuses are situated on the traditional lands of Indigenous peoples across the northwestern Ontario region.

A publicly funded, postsecondary institution, Confederation College is one of twenty-four colleges in Ontario. It delivers exceptional education and training to an average of 7,000 combined full- and part-time students per year across more than 56 full-time postsecondary programs. The College's annual operating budget is \$100 million. Confederation College currently employs 850 full- and part-time staff. Its regional economic impact and contribution is valued at \$707.3 million annually.

The Thunder Bay campus consists of the main campus, situated on 130 acres of property in the heart of Thunder Bay, and a smaller property, located adjacent to the Thunder Bay International Airport, approximately 10 minutes south of the main campus. Included on campus are four main academic buildings: Shuniah, Dorion, McIntyre and the Aviation Centre of Excellence. In addition, the College operates Sibley Hall Residence, Spruce and Cedar House Residences and the Student Wellness Centre.

Governance

As one of Ontario's twenty-four public community colleges, Confederation College is governed by a Board that strives to provide learners with high quality education and training. Confederation College exists to ensure: diverse learners acquire knowledge, skills and attitudes for success; Indigenous learners experience success in their learning journeys; and diverse communities have access to a skilled and knowledgeable workforce.

The Board of Governors is composed of seventeen individuals: 12 external Governors who reflect the various sectors of the community served by the College; four internal Governors representing Students, Faculty, Support Staff and Administrative Staff plus the President. Two thirds of the members are Board-appointed, and one third of the members are appointed by the Lieutenant Governor in Council. The Board of Governors has all the powers and duties of a corporation under the Ontario Corporations Act, except where additions or modifications have been made through regulation under the Ministry of Colleges and Universities Act.

The Board is responsible for strategic leadership and good governance. The Board enhances the College's public image and provides a link between the organization and the communities served. Governors play a vital role in shaping Confederation's strategic direction and community diversity. The Board has a strong and heartfelt commitment to advance decolonization and reconciliation efforts at the College. Gender balance, geographic representation, and an ability to evolve relationships that will build and support Confederation College are also priorities of the Board.

The College’s current strategic plan for 2020 – 2025 was developed through extensive collaboration with our employees, students and community partners. Integrating the voices of our stakeholders was critical in creating a plan that we can all believe in as we continue to change the lives through learning. The strategic plan enables us to deliver our missions and values, and ensure our values of courage, equity and relationships are demonstrated in the work we do every day. The strategic plan is grounded on four strategic pillars: Access and Success, Indigenous Learning, Institutional Excellence and Community Prosperity. Each pillar stands on its own as a significant area of focus, and each works in tandem with the others. The College is currently in the final year of the five-year strategic plan.

Our values are defined as:

- Courage:** willing to take action or make decisions that may be difficult or challenging
- Equity:** facilitating fair and just outcomes for all individuals to achieve their full potential
- Relationships:** supporting teamwork and collaboration with the individuals and communities we serve

The Four Pillars that form our strategic plan are:

- Access and Success:** Confederation College creates a positive, supportive environment that attracts students and meets their educational objectives.
- Indigenous Learning:** Confederation College aspires to be a leader in Indigenous learning in Canada.
- Institutional Excellence:** Confederation College is recognized as an excellent and progressive organization.
- Community Prosperity:** Confederation College enriches the quality of life, prosperity and sustainability of diverse communities.

Confederation College delivers high-quality education and training that meets the evolving needs of our students and the region we serve. Our supply chain and procurement sourcing activities are limited to supporting the programs and training we deliver, and our operational needs. The majority of our products are sourced as finished product and from Canadian businesses. We do not have any direct sourcing with organizations in countries identified as at risk on the global slavery index. The majority of our sourcing activity is through suppliers that we have multi-year agreements with or have a long-standing relationship working with. Our multi-year agreements are secured through an open and transparent competitive procurement process, either directly by the College or through a provincial centralized procurement organization. Our organization’s supply chain activity is mandated to comply with the Broader Public Sector Procurement Directive with principles of Accountability, Transparency and Value for Money.

Policies and Due Diligence Processes

Confederation College strives to maintain the highest level of public confidence in all aspects of our organization, and this is the benchmark for the development of many of our policies and procedures.

Through our Code of Conduct policy, Confederation College strives to maintain the highest level of public confidence in all aspects of our organization. Our faculty, staff and students come from diverse backgrounds and lifestyles, and as a result, have varied belief structures. The Code of Conduct was developed based on our corporate values of diversity, respect, caring and openness, learning and leading, and excellence.

Within our Human Rights and Decolonization Policy, Confederation College acknowledges its responsibility to address racism against Indigenous people, and any group of people based on their racialized status, including colour, nationality, ethnic or ethno-religious identities. This past year, the College has started to build a Reconciliation Action Plan (RAP) framework and completed its initial assessment and inventory of opportunities for RAP commitments to build the framework. Work will continue throughout 2024 to complete.

Confederation College's Diversity, Equity and Indigenous Lens is a tool that helps ensure Confederation's policies, programs and practices are free of elements that knowingly or unknowingly enable the exclusion of Indigenous peoples. The Lens is built upon a common understanding of the colonial history of Canada and seeks to provide best practices, resources and specific guidance for employees of Confederation College to ensure Indigenous perspectives and Ways of Knowing are incorporated and accurately reflected across institutional systems.

In April 2021, Confederation College signed the Sustainable Development Goals (SDG) Accord. The Accord is a commitment learning institutions are making to one another to do more to deliver the goals, and to share learnings nationally, and internationally. It is also part of a larger global effort of the United Nations to support sustainable development. As a signatory, Confederation College commits to working towards the 17 United Nations' SDGs and reports on its progress annually. Goals 4 and 8 of the SDG Accord align with the objectives of *the Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

The College recognizes that poor environmental, social and/or governance (ESG) practices can have a negative impact on our society, and ultimately affects the long-term performance of the investments that we make. As a result, we believe the consideration of ESG factors in our investment process aligns with our fiduciary duty to act in the best interest of our stakeholders. As part of our commitment to responsible investing, we select investment managers that are signatories of the UN-backed Principles for Responsible Investment (UNPRI). Currently, the College's investment manager has been a signatory of the UNPRI since December 2013, and our investment policy is incorporates environmental, social and governance (ESG) factors as core components of the investment process.

Additionally, the College is participating in the collaboration of Ontario Colleges to develop a formal sustainable procurement policy, procedure and tool kit. This policy will support and align with the College's sustainability goals and values. Every procurement has a different blend of relevant sustainability risks and potential opportunities that can be embedded into the supply chain process. The college has identified four pillars of sustainable procurement; environmental, ethical, social and

indigenous that will form the foundation of this policy. Specifically, the ethical procurement pillar speaks to reducing modern slavery and 'sweatshop labour' by setting recognized minimum workplace standards for suppliers and subcontractors. This involves assessing compliance with the United Nations' Universal Declaration of Human Rights and the International Labour Organization's conventions against child labour, forced labour and employment discrimination.

Supplier Code of Conduct

Confederation College is committed to transparency, accountability and a strategic approach to procurement and expects suppliers to maintain and continually improve responsible, ethical, and sustainable business practices, operations, and processes, whether deliverables are produced in Canada or elsewhere.

This Confederation College Supplier Code of Conduct ("the Code"), supports our Procurement Policy, and sets out the minimum standards for our suppliers and their subcontractors/suppliers to promote ethical business conduct, safe and healthy workplaces, fair labour practices and social and environmental responsibility.

Confederation College expects all its suppliers to affirm their compliance with the standards in this Code and ensure the standards are being upheld by any of their subcontractors. Stated compliance with all provisions set out in this Code will proclaim that the supplier is compliant with the core labour conventions of the International Labour Organization (ILO) and other applicable regulations in the countries in which they operate. Suppliers are expected to comply with all applicable laws and regulations of, including those laws relating to labour, worker health and safety, and the environment. Where the provisions of law and the Code address the same issue, the provision that is most stringent will apply.

Our Supplier Code specifically includes provisions prohibiting forced labour and child labour, as follows:

Forced Labor

There shall be no use of forced labor, including prison labor, indentured labor, bonded labor, or other forms of forced labor. All work shall be voluntary, and workers shall be free to leave upon reasonable notice.

Child Labor

No persons shall be employed under the age of 15 or younger than the age for completing compulsory education in the country of manufacture, whichever is higher. Workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers.

Risks of modern slavery in our operations and supply chain

Our methodology to identify risks is based on 1) whether the supplier is headquartered or its manufacturing sites are located in countries that have a low score on the corruption perception index and/or that are at risk according to the global slavery index based on the products they supply to the College, 2) whether the College is supplied with certain indirect goods and services, and 3) if the products offered by the supplier to the College include raw materials.

Training

The College's employees receive regular tailored training on ethical topics and our policies. Additionally, all new employees are required to acknowledge they have read and understand the Code of Conduct policy. The College has provided initial training to targeted audiences on forced and child labour in supply chains.

Remediation Measures

The College has undertaken the following:

- reviewed and updated our Supplier Code of Conduct in March 2024;
- conducted a preliminary initial internal assessment of the risks of forced labour and/or child labour in our supply chains.
- Delivered a presentation to the management team and Board of Governors reviewing Bill S-211, our approach to mitigating risk, and each management team members role in supporting the initiative.

Assessing Effectiveness

Confederation College has measures in place to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains. We are committed to enhancing our due diligence with our suppliers to ensure that are in alignment with Bill S-211. We intend to assess the effectiveness of new measures on a go forward basis.

Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Governors of Confederation College

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind The Confederation College of Applied Arts and Technology

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Per: Daryl Skworchinski
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Daryl Skworchinski

Chair, Board of Governors

Date: May 30, 2024