

Fighting Against Forced Labour and Child Labour in Supply Chains

Annual Report for the Fiscal Year ending March 31, 2025



1. INTRODUCTION

Brandon University (the University) is a small regional university located in Brandon, Manitoba with a student population of approximately 3,200 and more than 400 faculty and staff.

The University is committed to fostering an environment of social responsibility, acting ethically, identifying risks, and improving its practices to prevent forced labour or child labour in its supply chains.

This statement is made in pursuant to section 11 of Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff*, which is commonly referred to as Canada's *Modern Slavery Act* (the Act).

2. REPORTING ENTITY

Brandon University's view is that it qualifies as an "entity" under the Act based on the following:

- Canadian business presence
 - Has a place of business in Canada
 - Does business in Canada
 - Has assets in Canada

The University meets the following size related thresholds for an entity as defined by the Act:

- Has at least \$20 million in assets for at least one of its two most recent financial years
- Employs an average of at least 250 employees for at least one of its two most recent financial years

3. BRANDON UNIVERSITY'S STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Structure

Brandon University is a not-for-profit registered charitable organization that is a creation of the Legislature of Manitoba under *The Brandon University Act*. The University's objectives include the advancement of learning and the creation, preservation and dissemination of knowledge, along with the intellectual, social, ethical, and physical development and improvement of its students, employees and society.

The Brandon University Foundation (the Foundation) is a not-for-profit registered charitable organization that was created by the Legislature of Manitoba under *The Brandon University Foundation Incorporation Act*. The Foundation promotes the advancement of higher education at the University and aims to improve the quality of its facilities and activities.

The University is governed by its Board of Governors, which is responsible for ensuring the financial stability of the institution and ensuring consistency of institutional plans with its philosophy, goals and financial resources.

Activities & Supply Chains

The University sources goods and services from a variety of suppliers to support the education of its students and ensure adequate support for faculty and staff to conduct University operations. The majority of the University's suppliers are based in Canada, with a small number of purchases sourced from the United States and Europe annually.

4. BRANDON UNIVERSITY'S POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

Brandon University faculty and staff involved in the purchasing of goods and services on behalf of the University are required to adhere to Supply Chain Canada's Code of Ethics, which speaks to social responsibilities and includes the conventions of the International Labour Organization with respect to labour standards.

Brandon University does not have any additional policies or processes in place with respect to forced labour and/or child labour. However, the University is currently reviewing its purchasing policy and processes, with policy updates to include addressing ethical and sustainable procurement practices. Additionally, updates are planned for the University's purchase order terms and conditions and service contracts for suppliers to self-certify that they, and their direct suppliers, comply with human and labour rights standards including the payment of legal wages to the service provider's employees performing the service(s) requested.

5. PARTS OF BRANDON UNIVERSITY'S 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

Brandon University has identified clothing and footwear as an area of its supply chains that carries risk of force labour or child labour being used. The University has

not started the process to identify any other areas of its supply chains that carry increased risk of forced labour and/or child labour as of the end of its fiscal year for 2024/25. However, given the diversity of the University's supply chain, the University understands that because no additional areas have been identified does not mean there is no risk at all. Brandon University is committed to gaining better visibility into its supply chains and identifying areas of potential risk going forward.

6. MEASURES TAKEN TO REMEDIATE ANY FORCED LABOUR OR CHILD LABOUR

Brandon University has not identified any particular instances of forced labour or child labour in its supply chains. As a result, no remediation measures were taken with respect to forced labour or child labour in the fiscal year this report covers.

Given the risk associated with clothing and footwear, the University is exploring joining the Workers Rights Consortium as an affiliate institution. The Workers Rights Consortium assists its affiliates with the enforcement of labour standards adopted to protect producing apparel and other goods.

7. 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 SUPPLYCHAIN

As noted previously, since no instances of forced labour or child labour have been identified in the University's activities or supply chains, remediation measures regarding the loss of income to the most vulnerable families have not been required.

8. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

Currently, training is not provided to employees regarding forced labour and child labour. Brandon University recognizes the risks that come with this lack of training and endeavors to improve in this area. Future initiatives include procurement onboarding for all new faculty and staff and learning sessions for existing employees that include information on ethical procurement and sustainable purchasing activities.

9. HOW THE ENTITY ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR ARE NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS

The University does not have any formal metrics in place at the time of this report to assess its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains. However, the University is committed to improving its practices to gain better visibility into its supply base and monitoring for

activities that carry risk of forced labour and child labour, starting with improvements in policies and procedures. The University will begin incorporating criteria in all RFX documents requiring proponents/bidders to self-declare that their company is not engaged in practices involving forced labour or child labour.

10. ATTESTATION

This report has been approved by Brandon University's Board of Governors.

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.

Signed by:

Kevan Sumner
Chair – Brandon University Board of Governors
May 10, 2025
I have the authority to bind Brandon University.