



ANNUAL REPORT

Fighting Against Forced Labour and Child Labour in Supply Chains Act

This report is submitted pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (*the "Act"*). It outlines the University of Waterloo's (UWaterloo) actions in the 2026 reporting year to identify, assess, and address risks of forced and child labour within its operations and supply chains.

OUR COMMITMENT

UWaterloo is committed to preventing and reducing the risk of forced and child labour in all goods and services it procures. The University continues to apply responsible purchasing practices and expects its suppliers to maintain ethical labour standards.

STRUCTURE AND ACTIVITIES

UWaterloo is a publicly funded, research-intensive institution established under the University of Waterloo Act. It operates campuses in Waterloo, Kitchener, Cambridge, and Stratford, supporting more than 40,000 students across six Faculties. The University's operations include academic programming, research activities, student services, and the management of facilities and infrastructure.

SUPPLY CHAIN

The University procures a wide range of goods—from teaching materials and electronics to laboratory equipment—through both domestic and international suppliers, often in partnership with co-operative procurement groups within the Canadian public sector. UWaterloo also sells goods such as school supplies, apparel, technology products, gifts, and food items through campus and online retail channels. These products are sourced from North American and predominantly Canadian wholesalers who obtain goods from Europe and Asia.

POLICIES AND DUE DILIGENCE PROCESSES

UWaterloo maintains due diligence processes that promote ethical, responsible, and legally compliant procurement. The University's strategic sourcing approach evaluates total value, including social and environmental factors. Procurement staff adhere to the *Supply Chain Canada Code of Ethics*, which requires compliance with labour laws, protection of social rights, and responsible supply chain management. UWaterloo also follows the *Broader Public Sector Procurement Directive*, which emphasizes professionalism, accountability, and continuous improvement. Standard contractual terms for apparel suppliers require compliance with labour laws and allow the University to refuse or terminate contracts when standards are not met. As a Fair Trade Campus, the University sells and promotes Fairtrade-certified products across its food outlets. Additional information is being collected from wholesalers to strengthen risk identification.

STEPS TAKEN IN CALENDAR YEAR 2025

In 2025, UWaterloo finalized the updated Supplier Code of Conduct that outlines expectations related to labour practices, human rights, environmental responsibility, and ethical governance. Work continues to roll out the Supplier Code of Conduct across the supplier base with a focus on new agreements. In 2025, work began on updates to Policy 17 – Quotations and Tenders to align with ethical, ESG-focused, and Indigenous procurement practices.

FORCED LABOUR AND CHILD LABOUR RISKS

UWaterloo has not identified instances of forced or child labour within its operations or supply chains. However, the University continues to enhance its understanding of potential areas of elevated risk by mapping supplier sourcing locations and reviewing risk factors associated with certain regions, industries, and product types.

REMIEDIATION MEASURES

No cases of forced or child labour were identified; therefore, no remediation measures were required during the

reporting period.

REMEDICATION OF LOSS OF INCOME

UWaterloo did not take any actions that resulted in income loss to vulnerable families, and accordingly no remediation measures were necessary.

TRAINING PROVIDED TO EMPLOYEES

During the 2026 calendar year training developed with sector partner institutions will be made available to support employees in identifying and mitigating human rights risks within procurement activities.

ASSESSING EFFECTIVENESS

UWaterloo does not yet have formal procedures for assessing the effectiveness of its efforts to reduce forced and child labour risks. The University intends to explore appropriate assessment methods in future reporting years.

APPROVAL AND ATTESTATION

In compliance with section 11 of the Act, I attest that I have reviewed the information in this report and confirm that it is accurate and complete in all material respects for the reporting year.

IN WITNESS WHEREOF the authorized signing officer(s) of the University of Waterloo have executed this report as of the effective date of the signatures set out below.