



ANNUAL REPORT (Bill S-211)

This report is made pursuant to Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). The report outlines the approach and initiatives taken by the University of Waterloo (“UWaterloo” or the “University”) in the 2024 reporting year to identify and address the risks of forced labour and child labour in its business operations and supply chains.

OUR COMMITMENT

UWaterloo is committed to preventing and reducing the risk that forced labour or child labour is used in the production of goods that UWaterloo imports into Canada.

STRUCTURE AND ACTIVITIES

UWaterloo, a corporation incorporated pursuant to the *University of Waterloo Act*, is a publicly funded, research intensive post-secondary institution with a main campus in Waterloo, Ontario and satellite campuses in Kitchener, Cambridge and Stratford, Ontario. UWaterloo offers over 100 undergraduate programs and 190 graduate programs and has over 42,000 students enrolled. It employs over 5,000 people, including academic and administrative staff.

SUPPLY CHAIN

The University directly imports goods including teaching materials and supplies, computers and electronics, and research and lab equipment, from both domestic and global suppliers. In doing so, it collaborates with a number of co-operative procurement groups that operate in the Canadian university space.

The University also sells certain goods on campus and in some instances online, including school supplies, computer equipment and technology, branded apparel, gifts and souvenirs, personal care products and food. These goods are procured directly from wholesalers located in North America (and predominantly, Canada), who in turn source the goods from countries in Europe and Asia.

POLICIES AND DUE DILIGENCE PROCESSES

UWaterloo maintains general due diligence processes to promote responsible, ethical and legal procurement and supply chains.

The University’s strategic sourcing initiatives are premised on the fact that pricing is only one of the considerations that informs purchasing decisions: the “total cost” (and similarly “total value”) of a purchase - including with respect to social and environmental sustainability - is also key. Consistent with this, its Procurement and Contract Services department adheres to the Supply Chain Canada Code of Ethics for Professionals in the Field of Supply Chain Management. This requires its supply chain responsibilities to be exercised in a manner that promotes social rights, including conventions of the International Labour Organization. More generally, the Code also obliges adherence to all applicable laws and conventions. The Code includes internal complaint and disciplinary procedures for Code non-compliance.

UWaterloo is also member of, and makes co-operative purchases with other members of, the Ontario University Professional Procurement Management Association. The Association affirms the general principles of the UN Sustainable Development Goals, including but not limited to sustainable and social considerations as a criterion in purchasing decisions.

In addition, the University abides by the Broader Public Sector Procurement Directive (Ontario), including its Supply Chain Code of Ethics, which affirms its commitment to work continuously to improve its supply



chain policies and procedures, to improve supply chain knowledge and skill levels, and to share leading practices to ensure an ethical, professional, and accountable supply chain.

Further, in May 2019, the University was designated a “Fair Trade Campus” by Fairtrade Canada, which requires that Fairtrade-certified coffee, tea and chocolate be sold and actively promoted at all University- and student-operated food outlets.

Finally, the University maintains workplace policies and procedures to operate in compliance with provincial employment standards, human rights, and occupational health and safety legislation.

STEPS TAKEN IN THE FINANCIAL YEAR ENDED APRIL 30, 2024

In addition to the above general policies and due diligence processes, UWaterloo took specific steps throughout the financial year to prevent the risk of forced or child labour in its supply chain.

Specifically, the University developed standard contractual terms for its apparel suppliers, which requires the supplier to uphold just labour practices and to attest to compliance with labour laws and conventions in their country(s) of operation. The supplier is also required to attest to the labour law compliance of their contractors. In addition, the standard contractual terms permit UWaterloo to cancel or refuse contracts where the above labour standards are not complied with. UWaterloo is continuing to roll out these terms across its supplier base.

The University has also been collecting additional information about its wholesalers, and in particular, their own sourcing of products, to better identify areas of risk as articulated below.

FORCED LABOUR AND CHILD LABOUR RISKS

UWaterloo is working to identify specific risks of forced labour and child labour that may exist in its supply chain, such as beginning to map out the locations from which its suppliers source goods as above. The University is aware that there may be higher risks associated with certain regions, goods, and industries.

REMEDATION MEASURES

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

REMEDICATION OF LOSS OF INCOME

UWaterloo 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 income remediation measures.

TRAINING PROVIDED TO EMPLOYEES

UWaterloo currently does not provide employee training specific to forced and child labour but will assess what training may be appropriate moving forward.

ASSESSING EFFECTIVENESS

UWaterloo does not have specific procedures currently in place to assess its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its supply chain. In the upcoming years, UWaterloo intends to explore any methods that it can use to assess effectiveness.