



2024 Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Introduction

This report has been prepared by Camosun College ("Camosun" or the "College") in respect of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for our financial year ending March 31, 2024.

Camosun is committed to ethical, sustainable, and responsible procurement practices. We recently established a Supplier Standard of Conduct that provides an accountability framework for our suppliers to mitigate and reduce the risk of forced labour and child labour in our supply chain.

Structure, activities and supply chain

Camosun is a publicly funded post-secondary institution in Victoria, British Columbia, incorporated under the *BC College and Institute Act*. Camosun commenced operations in 1971. We operate two campuses in Victoria, the Lansdowne Campus and the Interurban Campus. We have approximately 1,500 employees, some of which are unionized.

Camosun is a registered charity governed by a Board of Governors, the majority of which are appointed by the province of British Columbia. The Board of Governors is responsible for establishing appropriate governance policies in compliance with the *College and Institute Act* and ensuring that the policies and directives of the College comply with applicable legal and regulatory requirements.

Camosun sells trade and training books, clothing, school supplies, stationery, giftware, and packaged food on our campuses. To support our academic and operational activities, Camosun procures a variety of goods and materials, including research materials, education textbooks, clothing, gifts, and other supplies.

During the reporting period, we mapped the type of goods and origin of our Tier 1 and Tier 2 supply chain. Our goods are sourced from Canadian suppliers and imported from suppliers outside of Canada. 70% of our imported goods were from the United States, with the remaining imports from Europe and Asia.

Given the relatively small amount of goods that we procure and sell, our leverage over the supply chain is limited. Camosun is a member of BCNET, a non-profit organization that provides post-secondary institutions in British Columbia access to product agreements, which increases our leverage over procurement, which positions us to advance sustainability and ethical buying practices.

Steps to prevent and reduce the risks of forced labour and child labour

In our financial year ending March 31, 2024, Camosun's approach to preventing and reducing the risks of forced labour or child labour in our operations and supply chain included:

- Continuing to affirm our commitment to ethical conducts as set out in our Code of Conduct
- Mapping our direct supply chain.
- Developing a Supplier Standard of Conduct to hold suppliers accountable for ethical and legal conduct, including addressing the risks of forced labour and child labour.

- Continuing to implement policies and standards of conduct to protect the rights of workers in our operations and comply with safety, human rights, and employment laws.
- Applying our College-Wide Risk Management policies and standards to identify and mitigate risks in our operations and activities. Encouraging reporting of any wrongdoing, act or omission that may pose danger to the life, health, or safety of persons.
- Continuing to be an active member of BCNET to improve our leverage over ethical procurement practices.

Policies and due diligence

Camosun has adopted policies and procedures that incorporate sustainable business conduct in our operations and supply chains.

In our operations, we address the risks of forced labour and child labour by:

- Implementing our Corporate Relations Policy, which guides our decision-making with respect to the nature of relationships that Camosun develops with the business and professional community.
- Adopting a Standards of Conduct Policy that sets the standards expected of our employees. Our employees are to act in an honest and ethical manner at all times, and in compliance with all applicable laws and regulations. Compliance with the Standards of Conduct is a condition of employment with Camosun.
- Implementing policies, rules, and procedures to comply with applicable Canadian laws and our collective agreements relating to health and safety, human rights, and employment standards regulations governing our hours of work, safe working conditions, and age of employment.
- Encouraging reporting and investigating any respectful workplace, health and safety, human rights, or other complaints relating to our values of equity, safety, and respect for workers, students, and our community. Our Protected Disclosure Policy sets out our commitment to protect any employee who reports a wrongdoing that could pose danger to the life, health, or safety of persons, or to the environment.

In our supply chains, we address the risks of forced labour and child labour by:

- Centralizing our procurement decisions and appointing a dedicated Procurement Specialist to ensure public procurement standards and laws are upheld through the procurement cycle, ensure enforcement of appropriate guidance, and to train employees on our standards.
- Implementing our Commercial Activity Policy to guide our decision making with respect to providing commercial access to Camosun community for Camosun-operated or contracted services, such as food services, vending services, health related or personal related services, etc. These relationships must be congruent with Camosun's mission, values, policies, and priorities.
- Establishing a purchasing accountability framework in respect of the procurement of goods and services in accordance with best purchasing practices. Our Purchasing Policy requires that all procurement activities to comply with applicable laws on the procurement of goods and services, including laws relating to assessing and preventing forced labour and child labour.
- Developing a new Supplier Standard of Conduct that sets out an accountability framework for our suppliers in line with established human rights principles and Camosun's values. Our suppliers are required to demonstrate transparency, accountability, and ethical practices throughout their supply chains. They must comply with all labour and human rights regulations, including fair wages, reasonable working hours, and freedom from harassment and/or discrimination. Our suppliers are not to use forced labour, bonded labour, or child labour in their operations.

Assessing risks of forced labour and child labour

Camosun follows a documented, coordinated approach to risk management through our College-Wide Risk Management policy. We recognize that a coordinated risk management approach is critical to the achievement of our key objectives and strategic goals. Upon identification of a risk, we have a risk analysis measurement tool, which measures the likelihood of the probability of the risk event occurring and based on this, our Risk-Treatment Action plan kicks in to set out a proposed plan. This risk management approach enables Camosun to assess supply chain risks.

In this reporting year, Camosun did not identify risks of forced labour or child labour in our activities or supply chain. We recently started training our procurement team on assessing risk based on the Global Slavery Index, WalkFree.org, and the guidance issued by the Canadian government. To date, we are aware that there are potential risks in the global electronics supply chain and that risks are higher when procuring goods from countries that are conflict affected or have weak legal protection of workers. We are committed to evaluating and continuously improving our approach to assessing the risks of forced labour and child labour in our supply chain.

Remediation measures and remediation of loss of income

We encourage our employees to report conduct that violates our policies or that could pose danger to the life, health, or safety of persons, or to the environment. Camosun does not tolerate any form of retaliation against any employee who reports a violation of our policies.

Camosun is not aware of any incidents or reports of forced labour or child labour in respect to our operations or supply chain, and as such, we have not taken any remediation measures or remediation of loss of income to families as a result of forced labour or child labour.

Employee training

Camosun provides training to employees on our workplace policies and Standards of Conduct. We also provide mandatory training on our procurement practices and policies to our employees involved in procurement on our procurement policies and trade agreements. In addition, we have provided voluntary training sessions for all staff and faculty relating to procurement ethics. In this reporting year, we did not develop training for our employees specifically related to the risks of forced labour and child labour in supply chains.

Assessing the effectiveness of our approach

Our new Supplier Standard of Conduct requires our suppliers to maintain accurate documentation and records to demonstrate their compliance with the Act, which enables us to audit or otherwise assessment compliance and continuous improvement. Our risk analysis management tool also enables us to monitor and track emerging risks to our operations and supply chains and assess our effectiveness in preventing or responding to those risks.

Approval and attestation

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 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.

Dated in the City of Victoria, British Columbia, this 3rd day of ~~May~~ ^{June}, 2024.



NAME: Michael Stubbing

TITLE: Pres Chair, Finance Committee, Board of Governors

I have the authority to bind the Camosun College