

Modern Slavery Report 2023/24

Humber College Institute of Technology and Advanced Learning

This Modern Slavery Report (the “**Report**”) addresses the period from April 1, 2023 to March 31, 2024 and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)(the “**Act**”). This Report is made on behalf of Humber College Institute of Technology and Advanced Learning (“**Humber College**”).

1. Introduction

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading post-secondary institution, Humber College recognizes the important role that we have in ensuring that our operations and products, and the supply chains that support these, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the steps we have taken during Fiscal 2023/24 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by **Humber College** or of goods imported into Canada by **Humber College**.

2. Our Business

Established in 1967, The Humber College Institute of Technology and Advanced Learning is one of Canada’s leading post-secondary institutions with focus on Innovation, Opportunity, Partnership, and Support. At Humber College, we bring it all to more than 86,000 learners, in-person and online. As a global leader in polytechnic education, Humber provides in-depth theoretical learning, hands-on, work-integrated experiences, and applied research opportunities to students at three main Toronto locations and beyond. Extensive industry connections, experienced faculty, and a comprehensive range of credentials, including honours undergraduate degrees, Ontario graduate certificates, diplomas, apprenticeships, and certificates prepare career-ready global citizens for success in the future world of work. Humber College has campuses in Ontario, Canada.

Humber College’s supply chain includes businesses that supply goods and services to our organization, including a diverse array of goods and services including educational resources, facilities management supplies, information technology services, professional services, student support services, research supplies, training and development programs, sustainability initiatives, administrative supplies, and contracted services.

In total, we procure goods and services from approximately 1,500 suppliers and contractors of which 85% are located in Ontario for a total of 96% in Canada. The suppliers we engage include businesses that provide goods and services to the broader education sector.

Further information about our business can be found at www.humber.ca.

3. Our Policies

Policies

Through our organizational and governance policies we communicate our values and expectations, setting a high bar for ourselves and our suppliers, and make it clear that we do not tolerate any forms of forced labour or child labour. We are committed to consistently evolving and improving our approach. We do not tolerate child, forced or bonded labour in any of our operations or by suppliers working for us. We make every effort, including through carrying our due diligence and audits to prevent our activities having a negative impact on human rights. Our relevant policies are discussed in further detail below:

Supply Chain Code of Ethics

We are committed to conducting our business in a lawful and ethical manner. We follow Supply Chain Management Association Ontario's Supply Chain Code of Ethics (the Code). The Code, embedded in our Purchasing Policy, sets out guiding principles on professional conduct and establishes that in performing their job duties, **Humber College** employees should always act lawfully, ethically and in the best interests of **Humber College**.

Ontario Broader Public Sector (BPS) Supply Chain Code of Ethics.

Humber College follows the BPS Procurement Directive 2024 which includes the Supply Chain Code of Ethics [the code]. The Code is to ensure an ethical, professional, and accountable BPS Supply Chain.

Purchasing Policy

Humber College's Purchasing Policy details the requirements and expectations we have of our suppliers, their supply chains, and with whom we engage. We expect our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate and consistently monitor. We review our Purchasing Policy on a periodic basis to ensure that this policy is in line with current best practices.

Protected Disclosure (Whistleblower) Policy

Humber College is committed to providing an environment where members of the college community can confidently disclose, in good faith and based on reasonable grounds that wrongdoing has occurred or will occur. The purpose of the policy is to aid in fostering and maintaining a culture of compliance and accountability and to communicate and reinforce desired workplace values and behaviors to every part of the college.

Due Diligence

We expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

We acknowledge that employees working in our facilities and our supply chain are at potential risk of forced labour or child labour. In order to mitigate this risk, we follow a due diligence approach that includes the following steps:

- Compliance to Broader Public Sector Procurement Directive 2024 and its Supply Chain Code of Ethics.
- Implementing Building Ontario Business Initiative Act (BOBIA) to increase Ontario and Canada based suppliers.

4. Assessing Our Risk

Humber College engages in various activities to identify, assess, and manage supplier risk. In assessing the risk of forced and child labour in our business and supply chains, we engage with our peers and group purchasing organizations, and consult with OECM and Supply Ontario. To identify the business activities with the greatest exposure to these risks, we consider the following factors:

- Reliance on low skilled workforce
- Dangerous or undesirable work
- Presence of labour intermediaries
- Offshore production
- Long, complex, or non-transparent supply chain

Our exposure to the risk of forced labour and/or child labour increases when we engage with third parties, particularly in categories with high levels of third-party labour such as security guard services and food services.

5. Our Commitments

Steps to Prevent and Reduce Risks of Forced and Child Labour

- Purchasing Policy and Procedure that incorporates sustainability, social procurement, workforce development, social responsibility and fair labour into the procurement practices as appropriate, and give favorable considerations in its evaluation process to those foods and services that reflect this commitment.
- Ensuring livable wages when working with contracts involving third party labour.
- Implement Building Ontario Businesses Initiative requirements to increase the use of local Ontario based businesses.

Remediation Measures

Our Supply Chain Code of Ethics and our Whistleblower Policy require all employees and contract workers of Humber College to report actual or possible misconduct. We also undertake diligence efforts (as further described in this Report) to ensure that the risk of forced labour and child labour is mitigated in our business. In the event that we discover any forced labour or child labour in our business and supply chains, we take the following measures to remediate such forced labour or child labour:

- Cancellation of the contract;
- Suspension or termination of a supplier, sub-supplier or contractor;
- Capacity-building measures, enhanced supervision and/or monitoring of supplier, sub-supplier or contractor.

Training

Every new employee with purchasing or budget holder responsibility is required to complete a mandatory training on Humber's Purchasing Policy and Procedures and the BPS Procurement Directive to ensure that compliance is understood and properly applied to our daily activities. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge.

6. Our Progress and Effectiveness

As part of our governance processes, we monitor compliance with our policies on an ongoing basis. We also review any concerns raised through our Whistleblower Policy and other informal mechanisms of employee feedback. To date no significant concerns or complaints have been identified.

7. Approval & Signature

This Report was approved by **Humber College's Board of Directors** on **May 28, 2024** and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at www.Humber.ca.

In accordance with the requirements of the Act, and in particular section 11 thereof, I 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.



Tom Barlow
Chair, Board of Governors
May 31, 2024

I have the authority to bind **Humber College**.