



# UNIVERSITY OF WATERLOO

## 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 2025 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 purchases.

### 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 has six Faculties (Arts, Engineering, Environment, Health, Math and Science) and has over 40,000 students enrolled.

### SUPPLY CHAIN

The University directly purchases 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 public sector 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 of ownership” (and similarly “total value”) of a purchase - including with respect to social and environmental sustainability - is also key. Consistent with this, Procurement 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, the University is 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.

During the financial year 2024, 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.

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, 2025**

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.

University of Waterloo is committed to increasing awareness of the requirements under Bill S-211. As part of this effort, the University’s Procurement team is collaborating with the Ontario University Professional Procurement Management Association (OUPPMA) to develop a common training framework on forced and child labour for procurement professionals. The framework aims to help procurement professionals recognize and mitigate human rights risks in supply chains, ensure compliance with Bill S-211, and support ethical procurement practices through informed decision-making, stakeholder engagement, and supplier accountability.

To provide structured training, a modular framework is being developed, offering targeted guidance on key aspects of human rights in procurement:

- **Module 1: Awareness of Human Rights in Supply Chains**  
Covers the Procurement role in ethical sourcing, key compliance requirements under Bill S-211, and identifying red flags in high-risk industries.
- **Module 2: Interacting with Internal Clients on Human Rights**  
Focuses on legal, financial, and reputational risks, high-risk procurement areas, and balancing cost considerations with ethical decision-making.
- **Module 3: Interacting with Suppliers on Human Rights**  
Provides strategies for setting expectations, addressing violations, conducting due diligence, and enforcing a Supplier Code of Conduct.

In parallel, the Ontario university sector is working with CASPAR, a Canada wide inter-university working group on Sustainable Procurement, to develop an awareness video for their broader campus communities of decentralized purchasers. This video will cover human rights risks, modern slavery, and ethical supply chain management.

Additionally, UWaterloo has now developed a Supplier Code of Conduct. This comprehensive document outlines the institution’s commitment to collaborating with Suppliers who share and uphold our core values. The code promotes labour practices that protect against forced and child labour, unsafe working conditions and emphasizes fair wages. The code recognizes ethical business practices include money



laundrying prevention, fair competition, and respect for human rights, as well as maintaining confidentiality, protecting data, and ensuring animal rights. Additionally, it highlights our commitment to supporting Suppliers who champion diversity, equity, and inclusion.

The code also emphasizes the University's environmental responsibilities, encouraging partnerships with suppliers who are committed to reducing greenhouse gas emissions, minimizing pollution, and fostering biodiversity and sustainable resource management. The code outlines our expectation that suppliers maintain healthy, safe workplaces that prioritize worker welfare, comply with safety regulations, and are prepared for emergencies. By setting these clear expectations, the University reaffirms its dedication to ethical governance, sustainability, and social responsibility in all its supplier relationships.

The University will work on introducing the Supplier Code of Conduct to its Suppliers in the 2026 financial year.

#### **FORCED LABOUR AND CHILD LABOUR RISKS**

UWaterloo has not identified any forced labour or child labour in its activities or supply chains, however, UWaterloo continues to work on identifying 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, Suppliers, 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.

#### **REMEDATION 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 as noted above is working collaboratively within the sector on developing training.

#### **ASSESSING EFFECTIVENESS**

UWaterloo does not have specific procedures currently in place to assesses 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.

#### **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.