



## Overview of Bill S-211

Bill S-211 requires federal government institutions and certain other public and private organizations to report on steps taken to reduce and prevent the risk of forced labour and child labour within their supply chains. The Bill requires the following:

- Completion of an online questionnaire
- Submission of a report to Public Safety Canada annually
- Public availability of the report through two reporting mechanisms:
  - Published in a prominent location on the entity or government institutions website
  - Published in a electronic registry on the Public Safety Canada's website

## Government Report Requirements

The reporting requirements, defined by Public Safety Canada, include the following criteria:

- The steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity
- Its structure, activities and supply chains
- Its policies and due diligence processes in relation to forced labour and child labour
- The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk
- Any measures taken to remediate any forced labour or child labour
- Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains
- The training provided to employees on forced labour and child labour
- How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

## Report Approval and Attestation

The report is approved by the entity's governing body. The approved report must receive attestation through the following means:

- A statement that sets out whether it was approved by the appropriate governing body
- The signature of one or more members of the governing body of each entity that approved the report, accompanied by the name and title of the approving member, the date of signature and a statement confirming that the approving member has the legal authority to bind the entity

The signed attestation must be included in the PDF version of an entity's report. The questionnaire requires entities to confirm that their report has received the required approvals; and, includes a signed attestation.

The report has gone through extensive governance by the UofA and was signed and attested to by the board chair.

### **Current Steps Taken by the University of Alberta**

For the 2024 reporting period, Procurement and Contract Management (PCM) identified three deliverables:

1. Updates to the UofA Supplier Code of Conduct
2. Supplier scorecarding
3. Internal training

The Supplier Code of Conduct was updated in January 2024 and was used to develop the scorecarding criteria for engagement with the supplier community.

PCM reached out to 26 suppliers requesting the completion of an online questionnaire in order to gain information on sustainable procurement practices and forced and child labour in the supply chain. This engagement includes the completion of a questionnaire on the following topics:

1. The UofA Supplier Code of Conduct
2. Governance
3. Ethical business practices
4. Forced and child labour
5. Social performance standards
  - Health and safety practices
  - Labour practices
  - Equity, diversity and inclusion (EDI) standards and practices
  - Environmental stewardship (carbon emissions and pollution standards)
  - Waste management (reduce, reuse and recycle)
6. Information, security, data protection and destruction standards
7. Accountability and supplier onboarding

The results from the questionnaire were used to complete a scorecard for each vendor that identified Key Performance Indicators relating to environmental, social and governance standards (ESG).

### **Reporting Outcome**

The primary focus of Bill S-211 is to reduce the risk of forced and child labour in supply chains. During the review of the 26 supplier surveys, the UofA did not identify any current suppliers that engage in this practice.

### **2025 Reporting Initiatives**

Initiative #1: PCM will continue supplier engagement and scorecarding with an additional 50 suppliers who will receive the questionnaire this year for the purpose of scorecarding their ESG performance.

Initiative #2: PCM will re-engage with suppliers from the previous reporting year that had below average scoring to provide recommendations to improve compliance.

Initiative #3: PCM is currently circulating awareness training to current users in SupplyNet that outline the requirements of Bill S-211.

### Supplier Engagement

PCM will continue to work with suppliers to reduce the risk of forced and child labour in the Supply Chain while expanding our supplier engagement to include social responsibility, inclusivity, environmental stewardship, health, safety and labour practices, ethical business practices, animal welfare, supplier onboarding, accountability and due diligence.

PCM is committed to strong supplier relationships that support the practices identified in our Supplier Code of Conduct. To enhance the supplier relationship, PCM reviews and updates the Supplier Code of Conduct annually and identifies it as a mandatory requirement within PCM contract language.

Successful supplier relationships require commitment by all UofA personnel involved in the supply chain to minimize and reduce disputes and unsatisfactory deliverables. PCM is committed to supporting all units, departments and faculties to enhance the relationship.

### Available Links

[UofA Supplier Code of Conduct](#)

[Bill S-211 Requirements](#)

[UoA 2024 Bill S-211 Report](#)

### Link Questionnaire