

# **The Governors of the University of Calgary's Fighting Against Forced Labour and Child Labour in Supply Chain Report (2023)**

## **ABOUT THIS REPORT**

The Governors of the University of Calgary has prepared this report (the "**Report**") pursuant to the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") for the financial year ended March 31, 2024 (the "**Reporting Period**"). All references in this Report to "**the University**", "**UCalgary**" "**we**", "**us**" or "**our**" refer to the Governors of the University of Calgary unless otherwise indicated. This Report has not been externally assured.

This Report describes UCalgary's policies and procedures applicable during the Reporting Period that enhance transparency in our supply chains and that assist to prevent and reduce the risk that forced labour or child labour ("**Modern Slavery**") is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada. This has been done in accordance with the mandatory reporting criteria outlined in Sections 11(1) and 11(3) of the Act.

The University of Calgary does not report under similar legislation in any other jurisdiction.

## **INTRODUCTION**

At UCalgary, we understand that we inhabit a turbulent time, but we do so purposefully and with a goal to equip our students and staff with the ingenuity to improve the world. We strive for inimitable excellence through innovative teaching and learning, cutting-edge exploration and community linkage. We seek to surpass today's limitations, our quest a prosperous, compassionate, sustainable and equitable world. We aim to spark global change, to solve what seems unsolvable.

We believe that teaching, research and service to the community requires a shared commitment to the core values of the University as well as a commitment to conduct University activities ethically. When representing the University, we require all employees, academic staff members, appointees, students and volunteers (collectively, the "**UCalgary Parties**") to act ethically, honestly and with integrity, and in accordance with the principles of fairness, good faith and respect.

UCalgary opposes Modern Slavery and human trafficking in any form. Modern Slavery violates our core values, our commitment to integrity and social responsibility, and the expectations for appropriate conduct of UCalgary Parties under our policies, in addition to violating Canadian and international law.

## **STRUCTURE, ACTIVITIES AND SUPPLY CHAINS**

### ***Company Structure, Activities and Operations***

UCalgary is a public research university in Calgary, Alberta, and was established in 1966. It is composed of 14 faculties and over 85 research institutes and centres. UCalgary offers students a high-quality educational experience that prepares them for success in life, as well as research that addresses society's most persistent challenges. Our creation and transfer of knowledge contributes every day to Canada's global competitive advantage and makes the world a better place.

The Governors of the University of Calgary is a corporation continued under the *Post-secondary Learning Act* (Alberta). Pursuant to the *Post-secondary Learning Act*, the University is a comprehensive academic and research university offering undergraduate and graduate degree programs as well as a full range of continuing education programs and activities. The University is also a registered charity.

The University has approximately 37,000 students, including both undergraduate and graduate students; 1,850 academic staff actively engaged in research scholarship and teaching; and 2,900 non-academic staff focused on operating the institution and delivering our core mandate. A significant portion of the University of Calgary's employee base is represented by one of four bargaining units.

### ***Our Supply Chains***

In 2023, the University engaged with suppliers that provided it with the following general categories of goods: scientific supplies, office supplies, chemicals, gases, animals, equipment, furniture, software, and hardware. Most of these goods were not imported and were purchased from Canadian suppliers.

Given the nature of the University of Calgary as a research institution, many of our procurement activities that did involve imports were unique or discrete imports for the purchase of goods required to support a research project. Goods were imported or sourced globally from several jurisdictions, including North America, Europe, Asia, and South America, with the bulk of our goods being imported from the US.

In addition, the UCalgary bookstore imports textbooks, clothing and office supplies from various jurisdictions. The majority of the vendors from whom clothing are imported by the UCalgary bookstore are accredited by the Fair Labor Association (the "FLA"), an American non-profit organization. FLA member companies are expected to implement the FLA Fair Labour Code, which prohibits forced labour and child labour.

### **POLICIES AND DUE DILIGENCE**

All UCalgary Parties are expected to become familiar with all of our policies and related procedures and instructions, understand and comply with UCalgary's policies and procedures, and act in good faith and in the best interest of the University.

#### **Code of Conduct**

The UCalgary Code of Conduct (the "**Code**") is applicable to all UCalgary Parties. The Code sets out that all UCalgary Parties are expected to fulfil their responsibilities in compliance with all applicable laws and applicable University policies and procedures in accordance with contractual commitments. When representing the University, we require all UCalgary Parties to act ethically, honestly and with integrity, and in accordance with the principles of fairness, good faith and respect.

The Code provides that any UCalgary Party may disclose known or suspected wrongdoings to our Protected Disclosure Advisor or an independent party in accordance with our Procedure for Protected Disclosure, which is discussed further below. A UCalgary Party who is found to have committed a wrongdoing may be subject to disciplinary action up to and including termination of employment or other relationship with the University. Any disciplinary action taken will be in

accordance with the provisions of any applicable collective agreement or any applicable policy relating to student conduct.

### **Supply Chain Management Policy**

UCalgary's Supply Chain Management Policy is intended to apply to all activities related to the purchase, distribution and payment for goods or services at the University. The purpose of the Supply Chain Policy includes, but is not limited to, seeking to have all acquisitions completed in a fair, equitable and accountable manner; setting out best practices relating to the purchase, distribution and payment for goods or services; and ensuring compliance with all applicable legislation and regulation, including trade legislation applicable to publicly funded institutions, such as the New West Partnership Trade Agreement ("NWTPA").

### **Procurement Handbook**

Our Procurement Handbook sets out procedures and guidance for administering and coordinating the procurement of goods and services for the University to ensure acquisitions are completed in accordance with applicable trade legislation, in a fair, open, transparent, equitable and accountable manner with attention to applying best practices in procurement to achieve the best value for the University. For example, subject to some exceptions, the NWPTA requires the University to engage in a competitive bid process or methodology for all purchases greater than \$75,000.

### **Purchase Order Terms and Conditions**

UCalgary has standard Terms and Conditions that are included in various procurement arrangements when applicable, including in Purchase Orders (the "**Terms and Conditions**"). The Terms and Conditions include warranties from vendors that all products or services supplied to the University conform to the standards set forth by Federal and Provincial regulations and that the shipping and handling of designated products will be made in accordance with all applicable regulations in force.

### **Procedure for Protected Disclosure**

Our Procedure for Protected Disclosure (the "**Procedure**") outlines the processes by which individuals may make a protected disclosure, the University will respond to a protected disclosure and individuals will be protected from reprisals for making a protected disclosure. For the purposes of the Procedure, protected disclosure includes any disclosure involving an allegation of a breach of the Code or any other University Policy or a disclosure made pursuant to the *Public Interest Disclosure (Whistleblower Protection) Act* (Alberta).

Individuals may make a protected disclosure by email to our Protected Disclosure Advisor; to a manager, supervisor, Dean or the President of the University; or by phone to our external service advisor established for this purpose (*Confidence Line*). The protected disclosure may be submitted anonymously by the complainant. Our Protected Disclosure Advisor may appoint an advocate for the complainant to assist in managing the complainant's welfare and can even act as a liaison and guide throughout the process.

We investigate all protected disclosures in accordance with the Procedure, the Protected Disclosure Advisor will advise the General Counsel whether the protected disclosure was substantiated and, depending on the outcome of the investigation, provide any recommendations

for non-disciplinary corrective action. A UCalgary Party who is found to have committed a wrongdoing may be subject to disciplinary action up to and including termination of employment or other relationship with the University. Any disciplinary action will be taken in accordance with the provisions of any applicable collective agreement or any applicable policy relating to student conduct.

We prohibit any action of reprisal against another individual, which may include any retaliatory measures taken against an individual because they have sought advice about making a protected disclosure, made a protected disclosure in good faith, co-operated in an investigation of a protected disclosure, or declined to participate in behaviour that would breach a University Policy.

### **Sustainability Policy**

UCalgary has a Sustainability Policy that sets out our commitment to excellence and leadership in the pursuit of advancing sustainability. Included in our Sustainability Policy are our commitments to:

- produce scholars with the necessary expertise and skills to address the complex challenges of a sustainable, peaceful, and just society;
- improve the long-term viability and vitality of the environmental, social and economic systems that support our campus and the global community;
- contribute to the rapid development and transfer of knowledge for sustainability through interdisciplinary inquiry, dedicated research, and collaborative partnerships;
- be an exemplar of campus sustainability in campus operations; and
- foster an ethic of civic engagement, dialogue and share commitment to actions that advance sustainability.

## **POTENTIAL RISKS IN OUR OPERATIONS AND SUPPLY CHAINS**

Following the December 20, 2023 publication of the Government of Canada's guidance document interpreting the Act and advising entities on the same, we reviewed and considered the implications for UCalgary and the nature of potential next steps to prevent or reduce the risk of Modern Slavery in our supply chains and operations.

### ***Potential Risks in Our Operations***

UCalgary considers the risk of Modern Slavery occurring within our operations to be low. Not only does the large majority of our workforce exist only in Canada, which has comprehensive and strict labour, employment, and human rights laws, but a majority of the workforce is also represented by one or more labour unions.

### ***Potential Risks in Our Supply Chains***

We recognize that there is a risk of Modern Slavery occurring within supply chains. We understand that geographic considerations, and the nature of the raw material and particular industries can be associated with a higher risk of Modern Slavery. There are also risks linked to certain industries even in countries considered to have lower risks of Modern Slavery. However, due to the policies

and procedures currently in place that apply to our supply chains and the nature of the majority of our procurement activities, as a whole, we view the risks of Modern Slavery in UCalgary's supply chains as low.

Further, with respect to procurement activities relating to the UCalgary Bookstore, we aim to limit our suppliers for clothing to a core group who have been FLA certified.

In 2023, we did not identify any instances of Modern Slavery in our operations and are not aware of any in our supply chains. Accordingly, no steps were taken to remediate Modern Slavery, or the loss of income associated with remediation efforts.

### ***Management and Mitigation of Potential Risks***

At UCalgary, we understand the importance of making a global impact while also staying true to our community and our values. UCalgary incorporates a wide range of individual personalities and belief systems. However, the people who work and study here share values that reflect the University's vision as a community. Our pursuit of excellence and the values we uphold in this pursuit help us to attract and retain exceptional students, faculty and staff. In turn, we strengthen our institutional capacity for leadership in the global landscape.

We currently have a number of processes, procedures and plans in place that assist the University with our goals in acting ethically and with integrity as a global citizen, as well as a number that are in the process of being implemented. These include:

- **Vetting of International Research Partners:** UCalgary's Research Security team assists researchers in assessing and mitigating risks with various international research partnerships. In doing these assessments, the researchers will flag and identify any potential humanitarian concerns with the international research partner for the UCalgary researcher.
- **Ahead of Tomorrow Strategic Plan:** In 2023, we published our Ahead of Tomorrow Strategic Plan (the "**Strategic Plan**") which shapes UCalgary's journey to 2030, considered through long-term, foundational commitments to: Equity, Diversity, Inclusion and Accessibility; Indigenous Engagement; Mental Health; Global Engagement; and Sustainability. The Strategic Plan includes four strategies to help us lay the groundwork for the future to achieve a global impact while remaining true to our community and values. These include: increasing access to impactful and future-focused education; harnessing the power of research and innovation to tackle society's biggest challenges; locating community at the centre of all we do; and making our processes clearer, simpler, and better than any other university.

### **TRAINING**

As UCalgary continues to review the application of our policies and procedures as it relates to reducing the risk of Modern Slavery in 2024, we will consider implementing, as appropriate, a training module for Supply Chain staff on Modern Slavery.

### **ASSESSING EFFECTIVENESS**

We will continue to re-evaluate the need to implement measure to assess the effectiveness of the processes we have in place based on the evaluation of our risks as described in this Report.

## APPROVAL & ATTESTATION

This Report was approved by the University of Calgary Board of Governors pursuant to section 11(4)(a) on May 27 2024.

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 or entities 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.



I have the authority to bind University of Calgary  
Mark Herman, Chair, Board of Governors  
**University of Calgary**  
May 27, 2024