

Fighting Against Forced Labour and Child Labour in Supply Chains Act Annual Report For the year ended April 30, 2026

This report is prepared by Queen's University at Kingston in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023), also known as Bill S-211, and is for the year ending April 30, 2026.

1. Queen's University Structure, Business and Supply Chain

1.1 Structure

Queen's University at Kingston is a body corporate, established by Royal Charter under the hand of Queen Victoria on October 16, 1841. As a body corporate established under Royal Charter prior to Confederation, Queen's University is a common law corporation.

The university is composed of academic departments, research centres, administrative departments, libraries, and museums as well as consolidated entities (as listed in its annual financial statements). Further information about the structure of Queen's can be found on [our website](#).

1.2 Business

Queen's University operates in the higher education sector in the province of Ontario. While we stand on a history of unparalleled academic and research achievement, we remain committed to challenging assumptions of the past. We drive forward the boundaries of knowledge through research and learning – all in service to our vision of an inclusive, diverse, and sustainable society.

The university's [current strategic plan](#) is posted on the Office of the Principal and Vice-Chancellor's website and sets out the key operations of Queen's. The [Bicentennial Vision](#) sets a clear direction for the University over the coming decades.

Queen's recognizes unions and labour rights, including freedom of association and collective bargaining for all. Our [Human Resources website](#) features a list of the University Unions and Associations and their corresponding collective agreements. The agreements set the terms of employment at Queen's as well as conditions for salary negotiation and conflict resolution.

1.3 Supply Chain

Supporting the University's teaching and research mission as well as its campus operations requires a broad range of goods and services. Purchases over the last fiscal year include materials to deliver on our academic mission, construction, facilities management and maintenance services, information technology goods and services including telecommunication, hardware, and

software, laboratory and scientific equipment and supplies, food services, professional and consultancy services, accommodation for staff travelling, and office supplies.

In the 2025 fiscal year Queen’s University spent approximately \$282M on goods and services (as per the university’s audited financial statement) from 5,381 suppliers in 77 countries.

In the 2025 fiscal year, 94% of spend was with suppliers located in Canada, and approximately 99% was with suppliers located in North America. Details of the top ten countries of spend is presented in Table 1.

Table 1. Top ten countries of spend

| Country | % of Spend by Country | # of Unique Suppliers |
|----------------|------------------------------|------------------------------|
| Canada | 93.50% | 4,335 |
| United States | 5.11% | 727 |
| Germany | 0.56% | 61 |
| Scotland | 0.12% | 4 |
| United Kingdom | 0.17% | 131 |
| Netherlands | 0.08% | 25 |
| China | 0.07% | 18 |
| France | 0.05% | 31 |
| Australia | 0.06% | 21 |
| India | 0.04% | 28 |

2. Policies and Due Diligence Processes in relation to forced labour and child labour

Procurement

As a public sector organization in the province of Ontario, Queen’s University is required to comply with various legislation including federal trade treaties. Ethical practices are included in various procurement processes (e.g. open competition) if there is a known risk of use of force labour or child labour (e.g. apparel).

Supplier Code of Conduct (SCOC)

The Queen’s Supplier Code of Conduct was implemented in March 2025. The SCOC is available on Strategic Procurement Services (SPS) [website](#). Queen’s SCOC must be accepted by a supplier’s representative that has the authority to bind the supplier. The Supplier Code of Conduct establishes minimum conduct standards, fosters proactive engagement and collaboration to drive continuous improvement in ethical, social, and environmental performance, and enhances transparency, accountability and trust between parties involved in Queen’s procurement and supply chain processes.

Sustainable Procurement

Under a Sustainable Procurement section in all open competitive tendering processes suppliers are required to provide Queen’s with information about the organization’s pay practices and policies and practices that consider human rights, force labour and child labour, animal rights, employee wellbeing, community impact, and fair trade.

Trademarks and Licensing

[Standards of Use](#) for Queen's visual identity, name, trademarks, and brands clearly articulate that Queen's University's visual identity should appear only on high-quality products which are produced under legal and fair labour conditions in accordance with [Queen's University | Trademark License Agreement: Schedule C – Code of Conduct](#).

Queen's University is a member of the [Workers' Right Consortium](#) (WRC). The WRC provides vital assistance enforcing labour standards put in place to protect workers who make clothing and other merchandise bearing the University's name and logo.

Improper Acts Reporting Policy

Queen's University places the greatest importance on the integrity of its operations and has in place several policies and procedures to address problems that may arise for the university community. Where there are genuine concerns of improper acts within our business or supply chains, employees are encouraged to report under this policy. This policy covers improper acts not addressed under other university policies or procedures. This policy permits university community members to raise concerns about a supply chain or an individual who may be at risk.

The University continues to develop frameworks and processes to address the risk of forced labour and child labour in supply chains. The University will continue to engage with its suppliers on the risk of forced labour or child labour and updates to processes will be reported on annually as part of this annual report.

3. Risk of Forced Labour or Child Labour in the entity's activities and supply chains

The University gathers information on the risk of forced or child labour in its supply chains through the sustainable procurement questions included in its procurement documents. These questions require suppliers to provide Queen's University with information about the organization's pay practices and policies and practices that consider human rights, animal rights, employee wellbeing, community impact, and fair trade. Responses to these questions enable the University to take appropriate steps to manage these risks if and as needed.

To manage the known risk of forced labour and child labour in manufacturing of apparel that bear the Queen's logo, [Standards of Use](#) for Queen's visual identity, name, trademarks, and brands clearly articulate that Queen's University's visual identity should appear only on high-quality products which are produced under legal and fair labour conditions in accordance with [Queen's University | Trademark License Agreement: Schedule C - Code of Conduct](#).

4. Measures taken to remediate any forced labour or child labour

For this report period, Queen's University has not identified any instances of forced labour or child labour in its activities or supply chains.

5. 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

For this report period, Queen's University has not identified any instances of lost income that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains.

6. Training provided to employees on forced labour and child labour

Queen's University remains committed to enhancing awareness and understanding of the requirements under Bill S-211. As part of this commitment, Queen's continues to collaborate with the Ontario University Professional Procurement Management Association (OUPPMA) to advance a shared training framework aimed at addressing forced and child labour risks within university supply chains.

The objective of this framework is to equip university staff and procurement professionals with the knowledge and tools necessary to recognize and mitigate forced and child labour risks, support compliance with Bill S-211, and reinforce ethical procurement practices. The training emphasizes informed decision making, proactive stakeholder engagement, and clear supplier accountability.

In the previous reporting period, OUPPMA committed to a three-part training program that will deliver structured learning for procurement professionals on key forced and child labour considerations. The first module, which focused on "Awareness of Forced and Child Labour In Supply Chains", was created in March 2025. All current Strategic Procurement Services Sourcing team members have taken this training as of February 2026.

During the past reporting year, OUPPMA developed a dynamic, online companion course as an alternative format to delivering this awareness training and broadened the target audience to include university staff and community members. This course is being released in phases which align with institutional training protocols and scheduling.

In the coming year, OUPPMA will continue developing advanced training and best practice resources for procurement professionals to support effective supplier engagement. This work, which has already begun, will emphasize proactive communication of expectations, risk identification and assessment, and how to treat high-risk purchases through public procurement practices.


Additionally, the Ontario university sector continues its strategic collaboration with CASPAR – a Canada-wide working group of procurement professionals dedicated to sustainable procurement – to share best practices and collectively strengthen efforts related to Bill S-211 compliance across Canadian universities. During this reporting period, CASPAR has adapted its approach and re-aligned objectives and best practices to support sector-wide awareness, including the continued development of shared resources including an awareness video on human rights risks, modern slavery, and responsible supply chain management and responsible purchasing.

7. Assessment of effectiveness in ensuring that forced labour and child labour are not being used in our business and supply chains

The University's effectiveness in ensuring that forced labour and child labour are not being used in our supply chains would be evaluated through internal audit processes. During the fiscal year of 2026, discussions took place between Queen's Internal Audit and Strategic Procurement Services regarding compliance to Bill S-211. Advisory work regarding internal controls related to Bill S-211 objectives are planned for the 2026/2027 fiscal year. To confirm, during this reporting period, no internal audit was conducted.

Approval of Report

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. This report has been approved by the Audit and Risk Committee with delegated authority from the Board of Trustees of Queen's University, of which I am a member.



Signature

April 17, 2026

Date

I have authority to bind Queen's University
Patrick Deane
Principal and Vice-Chancellor