

Fighting Against Forced Labour and Child Labour in Supply Chains Act Annual Report For the year ended April 30, 2025

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) and is for the fiscal year ended April 30, 2025.

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.

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 2024 fiscal year Queen's University spent approximately \$280M on goods and services (as per the university's audited financial statement) from 6,492 suppliers in 78 countries.

In the 2024 fiscal year, 89% of spend was with suppliers located in Canada, and approximately 97% 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	88.98%	5,185
United States	7.64%	755
France	0.56%	20
Australia	0.55%	14
United Kingdom	0.43%	96
China	0.29%	18
Italy	0.28%	10
India	0.20%	20
Tanzania, united Republic of	0.17%	4
Ethiopia	0.12%	5

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 is committed to increasing awareness of the requirements under Bill S-211. As part of this effort, the University's SPS department 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.

In parallel, the Ontario university sector is working with CASPAR (CAUBO-ACPAU Sustainable Procurement Approvisionnement Responsable), a national association focused 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.

These training initiatives are expected to launch in 2025, with rollout plans to follow.

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 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 16, 2025

Date

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