

PURPOSE

This annual report for the 2023 financial reporting year has been created by St. Clair College of Applied Arts and Technology (the “College”) for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “Act”).

OUR COMMITMENT

The College is committed to preventing and reducing the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, including goods that the College imports into Canada.

CATEGORIZATION, SECTOR, AND INDUSTRY

The College is an entity under the Act

The College is a public college of applied arts and technology. Its campuses across Windsor and Chatham are home to over 12,000 full-time post-secondary students studying in over 120 programs in the areas of health sciences, community studies, engineering technology, skilled trades, information technology, and business.

In terms of the Act’s threshold requirements, the College has at least \$20 million in assets for at least one of its two most recent financial years, it has generated at least \$40 million in revenue for at least one of its two most recent financial years, and it employs an average of at least 250 employees for at least one of its two most recent financial years.

Our Operations

The College operates in the post-secondary educational services industry and educates over 12,000 full-time post-secondary students annually. The College sells goods directly in Canada and imports goods into Canada that are produced outside of Canada, that are utilized for its on-campus bookstore, St. Clair College Regional Training Centre, third party online apparel store, on-campus clothing pop-up kiosk, Amazon corporate business account, and kit/materials provided to student for academic programming.

STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Our Supply Chain

The College is a publicly funded Crown agency that administers post-secondary and continuing education programs and apprenticeships. Pursuant to this, the College sources goods including but not limited to apparel and related products, classroom and lab supplies, furniture, and various office supplies from both domestic and global suppliers.

Steps Taken by the College in 2023

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, or of goods imported into Canada, the College undertook an internal assessment of the risks of forced labour and/or child labour in its activities and supply chain. Specifically, the College and its leadership started the process of reviewing and evaluating its internal policies and procedures with respect to the issues of child labour and forced labour. The College also maintains related policies and due diligence processes that were in force throughout 2023 and are set out in more detail below.

POLICIES AND DUE DILIGENCE PROCESSES

The College's Policies and Processes

The College maintained several policies and processes which affirm its commitment to abiding by applicable forced labour and child labour laws, including:

- a) The College's standard Request for Proposal ("RFP") form that is used by all those who wish to submit work proposals for the College's consideration. Pursuant to the RFP form, the College reserves the right to disqualify or cease business with any party who breaches or has breached any applicable laws.
- b) The College's standard form contract which is used in its dealings with suppliers. This standard form holds suppliers contractually liable and accountable for doing business within the requirements of all forms of applicable law. A similar standard form contract is used by vendor-of-record arrangements through the Ontario Education Collaborative Marketplace and Ontario Ministry of Public and Business Service Delivery upon which the College participates.
- c) The College's Purchasing Card Policy ensures that those with access to the College's credit cards retain receipts and provide justification for business card transactions. This permits the College to verify the vendors that do business with the College. The College's Travel, Meal and Hospitality Policy contains similar requirements for receipts and justification for transactions on expense reports.
- d) All College employees and volunteers who work with children or other vulnerable people are required to undergo a criminal record check which verifies the individual's date of birth. This helps verify that no workers are under Ontario's legal working age.
- e) The College's Recruitment and Selection Policy maintains hiring practices and procedures that are consistent with the requirements of applicable employment and labour legislation. Additionally, the College's onboarding process requires new employees to provide multiple pieces of government ID for verification of the age and other information provided by the employee.

FORCED LABOUR AND CHILD LABOUR RISKS

The College has started the process of identifying risks of forced labour and child labour, including through the aforementioned internal assessment, RFP form, standard form contract, Purchasing Card Policy, criminal record checks, and Recruitment and Selection Policy.

REMEDATION MEASURES

The College has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

REMEDICATION OF LOSS OF INCOME

The College 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 remediation measures related to income loss.

TRAINING PROVIDED TO EMPLOYEES

In 2023, the College did not provide training to its employees on forced labour or child labour. Moving forward, the College will be assessing what related training may be appropriate.

ASSESSING EFFECTIVENESS

As outlined above, the College's RFP form, standard form contract, Purchasing Card Policy, criminal record checks, and Recruitment and Selection Policy do reduce the risk that child labour and/or forced labour is present in the College's activities and supply chain. The College currently does not have specific policies and procedures in place to assess its effectiveness of these control measures. However, it will be considering what methods of assessment may be appropriate in the future.

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.

IN WITNESS WHEREOF the authorized signing officer(s) of St. Clair College of Applied Arts and Technology have executed this report as of the effective date of the signatures set out below.

