



Bill S-211
April 2025

McMASTER UNIVERSITY

Fighting Against Forced Labour
and Child Labour in Supply
Chains Act
Public Safety Canada Report

Reporting entity's legal name: McMaster University

Financial reporting year: May 1, 2024, to April 30, 2025

Identification of a revised report: N/A

Business number(s): 11903 5988

Identification of a joint report: N/A

Identification of reporting obligations in other jurisdictions: N/A

Entity categorization according to the Act:
Entity (University)

Sector/industry: Public Sector / Higher Education

Location: Hamilton, Ontario, Canada

ABOUT MCMASTER UNIVERSITY

McMaster University is a globally recognized research-intensive institution, ranked 116th in the world in the 2025 Times Higher Education (THE) World University Rankings and tied for 4th in Canada with the University of Alberta. It excels in various disciplines, ranking 39th globally in Clinical and Health, 101–125 in Life Sciences, and 176–200 in Engineering. The university has a total enrollment of nearly 38,000 students for undergraduate and graduate combined. Its alumni network spans 227,000 graduates across 147 countries.

As one of Hamilton's largest employers, McMaster continues to be recognized as one of Hamilton-Niagara's Top Employers.

As a part of McMaster University's Institutional Priorities and Strategic Framework for 2021-2024, the university has a vision of advancing humans as a part of societal health and well-being. McMaster University acknowledges that forced labour is a human rights issue, and we understand we have a responsibility to mitigate all forms of exploitive practices within our operations and supply chain. As addressed in this report, McMaster University has a role in supporting ethical practices in supply chain as per Bill S-211, Fighting Against Forced Labour and Child Labour in Supply Chains Act.

BACKGROUND

We are committed to ensuring that there is no modern slavery or human trafficking in our supply base or related supplier engagements. Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place.

There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, slavery, mental or physical coercion or verbal abuse. We are committed in a workplace that is free of harassment and unlawful discrimination.

STRATEGIC PLAN: INSTITUTIONAL PRIORITIES AND STRATEGIC FRAMEWORK

McMaster University has a Strategic Plan which guides the University's collective efforts around five key institutional priorities, with each priority becoming a strategic goal with associated objectives, activities, and metrics. It is intended to be a living and evolving document and will serve as McMaster's agenda and accountability statement. Ethical practices in supply chain composition fall under the Operational Excellence and Global Communities Strategic Framework.

Inclusive Excellence: aspire to embed an inclusive approach that intentionally engages and respects a diversity of peoples, perspectives, and ways of knowing, in everything we do.

Teaching and Learning: further advance and support innovation in teaching and learning, within and beyond the classroom, and across disciplines and Faculties, to elevate teaching as a professional discipline, and equip our students with the knowledge and skills needed to make a transformative impact on our world.

Research and Scholarship: be the go-to place for world-class researchers and collaborators who share our values and commitment to working together across disciplines, sectors, and borders to develop knowledge, tackle global issues, and advance human understanding.

Engaging Local, National, Indigenous and Global Communities: further develop and expand our network of longstanding and respectful partnerships with communities, partners, research collaborators, and supporters for the benefit of all.

Operational Excellence: enable the administrative operations of the University to support the institutional vision and aspirations of our community of researchers, scholars, teachers, and learners most effectively.

REPORTING ENTITY AND STRUCTURE

McMaster University is governed by two separate bodies: the Senate for academic matters and the Board of Governors for financial and operational matters. The Board of Governors authorizes the annual budget, approves capital projects, ensures management of financial investments, and ensures the University is meeting its financial goals. In addition, the Board of Governors has sub-committees to address the University's specific needs.

MCMASTER UNIVERSITY SUPPLY CHAIN

The University has several policies and procedures which govern our activities and aim to reduce the risk of modern slavery in our operations and supply chain. These include, but are not limited to:

- Ontario Broader Public Sector Directive
- Supplier Code of Conduct
- Supply Chain Code of Ethics
- Request for Tender Documents
- Processes for Ancillary Operations
- Trade Agreements

Based on our most recent Fiscal Year ended April 2024, McMaster University's total spends for Ontario Business as defined by Building Ontario Businesses Initiative Act is estimated at +72% and +83% is with Canadian suppliers. This value will change annually, dependant on spend requirements.

Policies and Procedures - Ontario Public Sector Directive

As an organization that is governed by the Ontario Broader Public Sector Procurement Directive, McMaster University engages in ethical, fair, and transparent procurement practices which align with the Supply Chain Code of Ethics contained within the Directive. We continuously work with our supply chain partners to improve purchasing practices and to ensure the best value for money. As a large Canadian educational institution, McMaster University has a diverse population of students, staff and employees which require a vast mosaic of goods and services. These may include, but are not limited to engineering services, fuel for the nuclear reactor, furniture, laboratory supplies, consulting services, construction services, IT goods and services, food, athletic wear and so on. Wherever possible, the University onboards opportunities from

collaborative purchasing groups such as the Ontario Education Collaborative Marketplace (OECM) which was originally established by the provincial government to encourage collaboration.

The University also engages in collaborative Vendor of Record (VOR) arrangements with other Ontario universities in situations of shared items of interest to leverage purchasing power, to help reduce administrative costs, and to reduce repetition of administrative tasks and share workload. Examples of such collaborative opportunities with participation from multiple Ontario universities are laboratory suppliers and equipment, and Apple brand products and services.

To further support Bill S-211 and the Building Ontario Business Initiatives (BOBI) established by the Ontario government, as of April 1, 2024 McMaster University has included attestations statements to our supplier onboarding portal. Potential suppliers must self-identify if they qualify within the definition of an Ontario Business for BOBI. Potential suppliers must also self-identify whether they are following the ethical principles and employment standards for Bill S-211. These attestation statements will require suppliers to confirm their compliance with these initiatives which will assist McMaster staff making informed decisions choosing a supplier and will aid in Ontario Ministry and Federal reporting.

Statements that are included for the supplier onboarding process:

() As an Ontario Public Sector entity, McMaster University is required to comply with the Fighting Against Forced Labour and Child Labour in Supply Chains Act to protect vulnerable populations from human rights abuses and exploitation.*

<https://www.publicsafety.gc.ca/index-en.aspx>

As a supplier to McMaster University, I attest that my organization complies with ethical principles and employment standards for goods and services that were not produced with forced or child labour (alignment with International Labor Organization practices).

*(**) I confirm my organization qualifies as an Ontario Business under the Building Ontario Businesses Initiative Act (BOBI) which defines an Ontario Business as a supplier, manufacturer, or distributor of any business structure that conducts its activities on a permanent basis in Ontario and meets one of the following criteria:*

- a) has its headquarters or main office in Ontario, or*
- b) has at least 250 full-time employees in Ontario at the time of the applicable procurement process.*

Policies and Procedures: Supplier Code of Conduct

McMaster University is committed to conducting its business affairs in a socially responsible and ethical manner consistent with its educational, research and service missions, and to protecting and preserving the global environment. McMaster University seeks to achieve its aims through a variety of means including this Code of Labour Practices, which is a statement of minimum standards with respect to labour

practices. Suppliers, subcontractors, and licensees of McMaster University that fall within the scope of this Code are expected to comply with this Code, excerpted below.

University Suppliers and Subcontractors shall comply with the following standards:

- I. There shall be no new use of child labour and all current child labour shall be subject to Section III.B.4.ii. The term "child" means any person less than 15 (or 14 if local law sets minimum employment age at 14 consistent with developing country exemptions under the ILO Minimum Age Convention 16), unless local laws stipulate a higher age for work or mandatory schooling, in which case the higher age shall apply.
- II. There shall not be any use of forced prison labour, indentured labour, bonded labour or other forced labour.

<https://financial-affairs.mcmaster.ca/app/uploads/2019/02/Appendix-C-Code-of-Labour-Practices.pdf>

Policies and Procedures: Supply Chain Code of Ethics

McMaster University is committed to acting in an ethical, legally compliant, and socially responsible manner and requires our staff to adhere to similar standards. We have a clear code of behavior for day-to-day activity undertaken on behalf of the University. The Supply Chain Code of Ethics sets out the minimum ethical standards and business conduct for staff, students or any individuals that procure goods or services on behalf of the University. The Supply Chain Code of Ethics references to and must comply with the Code of Ethics and Laws of Canada and Ontario.

https://financial-affairs.mcmaster.ca/app/uploads/2019/02/supply_chain.pdf

Policies and Procedures: Request for Tender Documents

McMaster University's efforts to date in this area regarding our formal Request for Tender documents have been focussed on supporting the University's commitment to the UN Sustainable Development Goals (SDG). In 2022, McMaster University began to include sustainability as a measurement within 100% of its Request for Proposal tender request for bid submissions. Within the measurement of sustainability is the examination of sustainability beyond environmental sustainability, to examine Total Cost of Ownership, how the product assists the supplier's sustainability goals. It was recognized that it is important for McMaster to value the sustainability of our suppliers and reward the companies with a strong commitment to sustainability within their bid submissions. The potential bidders are provided links to the UN's SDGs within the bid document as a reference source. One UN SDG is Reduced Inequalities and a call to action to reduce inequalities within and amongst its member countries. Another UN SDG is Decent Work and Economic Growth which supports fighting against child and forced labour and supports humane working practices within supply chains.

To further comply with Fighting Against Forced Labour and Child Labour in Supply Chain Act, McMaster has added language in all our bid form templates to both the terms and conditions of the bid documents and the Form of Agreement confirming that as a Ontario Public Sector entity required to comply with the Fighting Against Forced Labour and Child Labour in Supply Chains Act. This will further protect the vulnerable populations from human rights abuses and exploitation and ensure the organization with which

we enter a contract complies with ethical principles and employment standards for goods and services that were not produced with forced or child labour (alignment with International Labor Organization practices).

Policies and Procedures: Ancillaries Operations

McMaster University's Ancillaries operations include our campus hospitality services and campus store. Higher education is at the forefront of today's efforts to contribute to the health & well-being of our communities; to minimize impacts on the environment; and, to influence future leaders to become responsible global citizens. Hospitality operations are in a position filled with opportunity and challenge that goes beyond simply providing menu options, we must now provide responsible leadership and guidance to enhance social, environmental, and economic stewardship.

Our supply chain efforts for Campus Hospitality Services focus on our Tier 1 suppliers which we rely on most of all to deliver our business objectives. All non-franchise coffee locations serve Fair or Ethical Trade Coffee and Tea. Campus hospitality services has a focus on purchasing local and uses Sysco Food Service as the primary food service provider which sources the majority of its food product from Ontario, Canadian and North American food sources. Campus Hospitality Services did an inquiry on our Tier 1 food suppliers and manufacturers which confirmed that supplier risk screening and reporting is performed to ensure responsible sourcing. As we become increasingly aware of these broad impacts, a commitment to aligning a socially responsible procurement approach with the McMaster's strategic framework is paramount.

The Campus Store, owned and operated by McMaster Retail operations, provides the campus community and alumni with official McMaster merchandise including a wide range of textbooks, general books, supplies, promotional and custom merchandise. Campus Store compiled attestations from five of their highest spend vendors regarding compliance with ethical principles and employment standards for goods and services, that were not produced with forced or child labour (in alignment with International Labor Organization practices).

Risk Mitigation

McMaster will take a multi-stage approach on this to mitigate risk on multiple levels. Given the highly decentralized nature of the administration of the University, its size, the diversity of its population, and the diversity of the products and services purchased, a proportional response will be taken to the risk assessment. Currently 8,429 suppliers are active in our e-procurement system. Furthermore, in typical financial year an additional 750 will be added.

We will continue to focus our efforts on our Tier 1 suppliers which we rely on for a good portion of our daily operational spend. McMaster continues to onboard primarily Ontario-based suppliers to ensure compliant labour sources. Promoting Ontario suppliers with our University community will reduce the risk of outsourcing goods and services to a foreign supplier that might use child or forced labour sources in its direct or indirect resources. A due diligence process has been used to select suppliers.

For our secondary suppliers, attestation of BOBI and Bill S-211 compliance will be required.

Training and Education

Due to the size and decentralization of McMaster University's workforce, as well as the nature of spending and constant onboarding of suppliers, education and training for staff and suppliers will be an ongoing activity. General training for staff is available through the MacBuy Portal modules. Additional information on ethical procurement regarding child and forced labour will be added to the training material.

McMaster University Strategic Procurement staff have been educated on Bill S-211 and will be given additional professional training, notably from the Provincial or Canadian Institutes of Public or Private Procurement. Most current Strategic Procurement staff have a public procurement certificate. Supplementary training will be made available for staff to ensure their skills remain current.

A quarterly reminder is also sent to Campus Stores and Hospitality to inform of the importance and ongoing training. Their commitment is a pinnacle in the success of our compliance and outcome.

Relevant Key Performance Indicators include:

- Total suppliers registered to MacBuy for the period: **742**
- Total suppliers responded as "YES" to comply to Statement (*) on page 5: **703**
- Total suppliers responded as "NO" to comply to Statement (*) on page 5: **29**

* Have been contacted by E-Procurement Supplier Specialist for validation of attestation response

- Total suppliers responded as BOBIA compliant for S211 (**) on page 5: **416**

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 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.



Name: Jane Allen

Title: Board Chair

Date: May 12, 2025

I/We have authority to sign on behalf of McMaster University