



Bill S-211  
April 2026

# 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, 2025, to April  
30, 2026**

**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 2026 Times Higher Education (THE) World University Rankings and tied for 4th in Canada. 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 approximately 38,000 students. 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.

These accomplishments reflect McMaster University's unwavering dedication to fostering academic excellence, pioneering research, and a diverse, inclusive community that prepares students for global success. With a total research income of sponsored research of \$423.2 million for 2025, McMaster research teams are making discoveries and advancing knowledge in every discipline. McMaster's commitment to the United Nations' Sustainable Development Goals has earned the university the rank of 14<sup>th</sup> in the world, and 3<sup>rd</sup> in Canada, in The Times Higher Education (THE) 2025 Impact Rankings which measure how universities' advance the improvement of life around the world and protection of the planet. McMaster was ranked the best in North America for working to end poverty (SDG 1); advancing good health and well-being (SDG 3), as well as clean water and sanitation (SDG 6).

## BACKGROUND

McMaster University is committed to preventing forced labour, human trafficking, and related human rights abuses within its operations and supply chains. The University maintains policies, systems, and controls to support ethical conduct and integrity in all supplier relationships. The University does not tolerate harsh or inhuman treatment of any kind, including harassment, abuse, forced labour, coercion, or discrimination, and is committed to a respectful and lawful workplace and supplier environment.

## STRATEGIC PLAN: SETTING THE COURSE

McMaster University is currently developing a strategic plan aimed at reflecting the university's values while addressing the needs of the community and the global context in which it operates. The strategic plan will guide the university's direction from 2026 to 2031 focussing on five key intuitional priorities:

1. **Inclusive Excellence:** The university aims to embed an inclusive approach that respects diverse perspectives and ways of knowing in all its activities.
2. **Teaching and Learning:** McMaster seeks to advance innovations in teaching, both within and beyond the classroom, to equip students with the knowledge and skills necessary for transformative global impact.
3. **Research and Scholarship:** The plan emphasizes the importance of being a leading institution for world-class researchers and collaborators, fostering interdisciplinary work to tackle global challenges.
4. **Engaging Communities:** McMaster is committed to developing and expanding partnerships with local, national, Indigenous, and global communities to enhance mutual benefits.

5. Operational Excellence: The university aims to enable its operations to effectively support the vision and aspirations of its community of researchers, scholars, teachers, and learners.

## 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
- Buy Ontario Procurement Directive
- Procurement Restriction Policy

McMaster University's spend for fiscal reporting year May 1, 2025, to April 30, 2026, is approximately +350M of which an estimated +80% is with Ontario suppliers and +89% is with Canadian suppliers. This value will change annually, dependant on spend requirements.

## Policies and Procedures - Ontario Public Sector Directive

As an organization governed by the Ontario Broader Public Sector (BPS) Procurement Directive, McMaster University follows ethical, fair, and transparent procurement practices aligned with the Directive's Supply Chain Code of Ethics. We work with supply chain partners to continuously improve purchasing practices and achieve best value for money. Where appropriate, the University leverages collaborative purchasing arrangements, including opportunities available through the Ontario Education Collaborative Marketplace (OECM). The University also participates in collaborative Vendor of Record (VOR) arrangements with other Ontario universities for shared needs to leverage purchasing power, reduce administrative costs, and streamline procurement processes.

Since 2024, McMaster University has included attestation statements to our supplier onboarding portal which address Forced Labour and Child Labour and identify Ontario businesses. These attestations support current legislation including the *Buy Ontario Act (Public Sector Procurement), 2025* which establishes a framework to prioritize Ontario and Canadian goods and services in procurement across the public sector. The attestations also support Bill S-211 with potential suppliers self-identifying whether they follow the Bill's employment standards and ethical principles. Potential suppliers must self-identify if they qualify within the definition of an Ontario business and 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:

*(i) 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/cnt/cntrng-crm/frcd-lbr-cndn-sply-chns/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).*

*(ii) I confirm my organization qualifies as an Ontario Business which 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 affairs ethically and in a socially responsible manner, consistent with its education, research, and service missions. The University's Code of Labour Practices sets minimum labour standards, and applicable suppliers, subcontractors, and licensees are expected to comply.

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

### **Policies and Procedures: Request for Tender Documents**

McMaster University's Request for Tender and Request for Proposal documents support the University's commitment to the UN Sustainable Development Goals. Since 2022, sustainability has been included as an evaluation criterion in 100% of RFP solicitations. This assessment considers environmental factors as well as broader measures such as total cost of ownership and how the goods or services support supplier sustainability objectives, and it is used to recognize and reward suppliers with demonstrated sustainability commitments.

McMaster University is committed to conducting its affairs in a socially responsible manner, consistent with its education, research, and services missions. The University's Code of Labour Practices sets minimum labour standards to which suppliers, and subcontractors are required to comply.

### **Policies and Procedures: Ancillaries Operations**

McMaster University's ancillary operations include Campus Hospitality Services and the Campus Store. As a post-secondary institution, the University aims to advance community health and well-being, minimize environmental impacts, and help develop future leaders as responsible global citizens. In this context, ancillary operations seek to provide responsible leadership that supports social, environmental, and economic stewardship.

Campus Hospitality Services Prioritizes Tier 1 suppliers, serves fair/ethical trade coffee and tea at non-franchise locations, and prioritizes local purchasing through Sysco Food Service, which sources products primarily locally from Ontario, Canada and North America through reputable companies. An inquiry with Tier 1 suppliers and manufacturers indicated that supplier risk screening and reporting are in place to support responsible sourcing which aligns with the University's strategic procurement framework. Hospitality Services maintains a socially responsible procurement policy intended to embed responsible sourcing standards into departmental purchasing including local sourcing with targets for Ontario-grown or Ontario-produced purchases (produce and non-produce categories).

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 uses a multi-stage, risk-based approach to mitigate the risk of forced labour and child labour across a decentralized procurement environment. Given the University's size, the diversity of purchases, and the number of suppliers in its procurement system, mitigation measures are applied proportionately based on supplier and category risk. There are currently approximately 9,300 suppliers onboard in our supplier portal with approximately 1,000 new suppliers onboarded annually.

For key (Tier 1) suppliers, McMaster focuses on due diligence measures that support continuity of operations and responsible sourcing. In accordance with the Buy Ontario Act (Public Sector Procurement), 2025, where applicable and consistent with other procurement obligations, the University identifies Ontario businesses and considers opportunities to prioritize Ontario and Canadian goods and services. This is complemented by forced labour and child labour controls (including supplier attestations and screening) to help reduce the risk of human rights abuses in the supply chain.

McMaster requires supplier onboarding attestations related to the Buy Ontario Act (Public Sector Procurement), 2025 and Bill S-211 compliance, as applicable. Where an attestation indicates non-compliance or raises concerns, the University follows up to validate the response and may apply additional due diligence and escalation measures.

## Training and Education

As Members of Ontario University Public Procurement Management Association Sustainably Team, McMaster University's Strategic Procurement management team contributed to developing a S211 module self-directed online course written with university staff as the intended audience to educate on S211. The course entitled S211- Forced Labour in Canadian Supply Chain will be a mandatory required course for McMaster University staff with access to procuring goods and services. This mandatory module provides a high-level introduction to Bill S-211, explains human rights risks existing in supply chain both domestic and globally, and applies in a meaningful way to the daily purchasing decisions made at a Canadian university.

The moral imperative of procuring responsibly from supply chain partners that refrain from using forced labour and child labour are highlighted. Reputational risks, legal risks and financial risks are also reviewed within the module. High risk commodities such as information technology, textiles, construction, and food services are explored using a risk-based lens which highlights sector-based factors and common red flags to provide staff practical advice in their daily procurement decisions. Transparency, cost control, predictably, and workers rights are noted as key benefits of resilient supply chains. Staff are provided guidelines how to make impactful decisions in their supplier selection such as ecolabels, important questions to ask suppliers, considerations when reviewing supplier websites, and third-party tools such as the Canadian Procurement Policy/Planning Tool (CGPPT).

The S211- Forced Labour in Canadian Supply Chain module will be launched in Spring 2026 for new staff onboarding. It will become part of the programmed regular mandatory training for staff as a part of the health, safety and regulatory training program on McMaster University's Avenue to Learn (D2L) training hub.

Relevant Key Performance Indicators include:

A) Total suppliers registered to MacBuy for the period: **1,112**

C) Total suppliers responded as “YES” to comply to Statement A(i) above: **1,112**

D) Total suppliers responded as “NO” to comply to Statement A(i) above: **0**

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

D) Total suppliers responded as BOBIA compliant: **788**

#### 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: *Steele*

Title: Board Chair

Date: May 20, 2026

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