

Bill S-211 Fighting Against Forced Labour in Supply Chains Act

Carleton University Compliance Report

March 2026

Prepared by the Department of Financial Services

Preamble

Carleton University is recognized as a leader nationally as a Top 5 comprehensive university, as well as a three-time Canada's Top 100 Employer plus Top Employer in the National Capital Region for 12 consecutive years.

As such, Carleton recognizes that forced and child labour remains prevalent around the world, and the importance of mitigating and upholding ethical standards to combat it within our operations and supply chains. As dramatic shifts in the nature of social interaction and the global economy continue, we are committed to Carleton's participation in the creation of solutions to Canada's shared social, economic, ecological and political challenges. Our vision is to extend our influence beyond campus and inspire our students to be engaged citizens who work to strengthen meaningful community partnerships. Together, we strive for wellness and sustainability — for individuals, for communities and for our planet.

In addition to Carleton University's strategic integrated plan, [Shape the Future 2020-2025](#), which identifies sustainability and wellness as a strategic direction, the university has begun its journey to facilitate ethical supply chain management practices and has several short-term activities planned. This report will serve to address these activities as they relate to **Bill S-211, Fighting Against Forced Labour and Child Labour in Supply Chains**.

Structure and Supply Chain

Governance and Structure

Founded in 1942 to advance higher learning, Carleton University was confirmed with degree-granting privileges by the Ontario Legislature through the passage of the [Carleton University Act](#) in 1952. The Act states the objects and purposes of the university, which are:

- The advancement of learning,
- The dissemination of knowledge,
- The intellectual, social, moral and physical development of its members, and the betterment of its community, and
- The establishment and maintenance of a non-sectarian college with university powers, having its seat in or about the City of Ottawa. 1952, c.117, s.3; 1957, c.130, s.1.

Carleton University is committed to respecting and achieving good governance. As a bicameral institution, governance at Carleton is shared by the [Board of Governors](#) and the [Senate](#). The Board of Governors serves as the corporate body and the Senate as the highest academic body.

Carleton University's organizational chart is available [here](#).

Supply Chain

Carleton University engages in extensive procurement activities, adhering to public procurement regulations and ethical sourcing practices. These activities encompass a broad spectrum of goods and services, including construction, professional and technical services, scientific equipment and supplies, IT hardware, network equipment and software, food and catering, book acquisitions and printing services, and waste, custodial and facilities management.

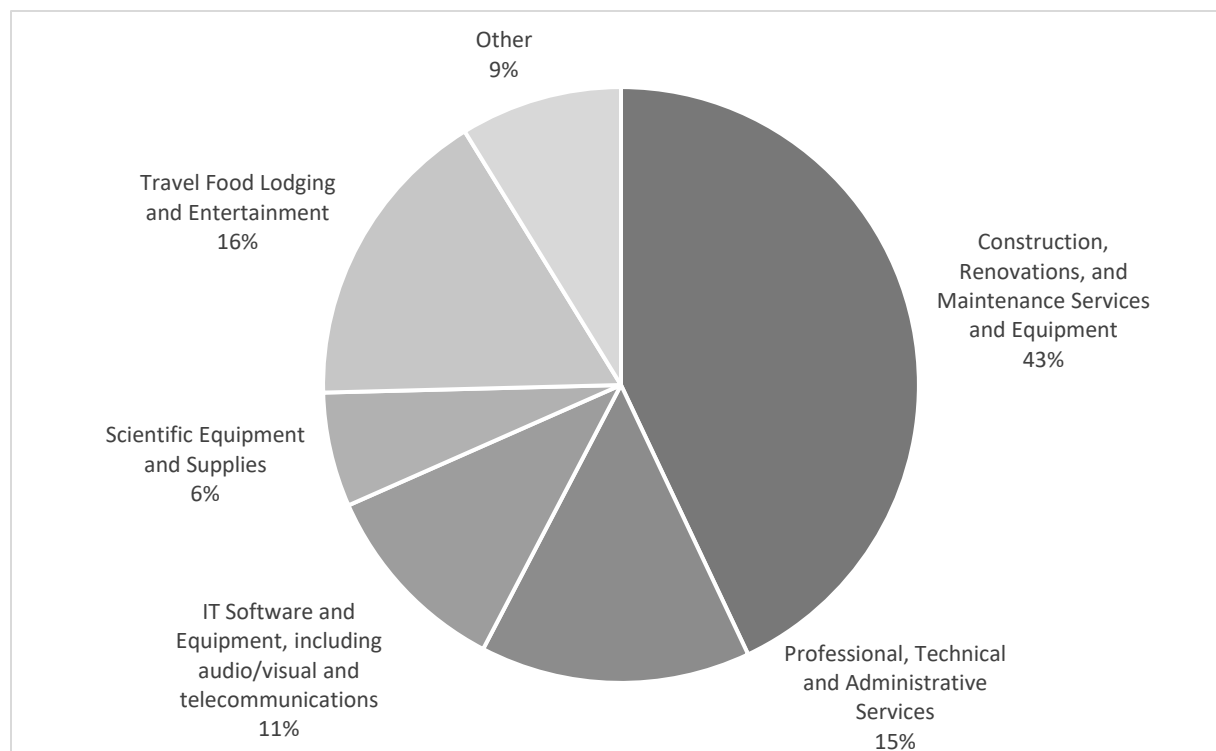
A significant portion of procurement is conducted through collaborative frameworks, notably with the Ministry of Public and Business Service Delivery, the Ontario Education Collaborative Marketplace (OECM), and other consortia, to leverage collective purchasing power and achieve cost efficiencies.

The university's procurement operating model is centrally led. This means that high-dollar and strategic procurement sourcing activities are coordinated centrally while delivery and transactional work are executed in a decentralized fashion. This model ensures compliance with Broader Public Sector procurement directives and our obligations under domestic and international trade treaties. Bringing about meaningful change to mitigate the risks of forced and child labour in the supply chain will be well supported by the centrally led procurement operating model, which helps to improve knowledge sharing, best practice execution and compliance.

Carleton recognizes the existence of forced and child labour risks across its supply chains and, further, that these risks could be elevated in certain supply chains due to factors such as geographical location and/or source locations for materials and products procured by the university. There is an identified lack of visibility in certain overseas markets, which could present an increased risk of forced and child labour, especially in secondary (and further) supply chain tiers and in source materials used in the university's goods and services.

Figure 1 summarizes the university's primary procurement spending across commodity categories representing 5% or more of the total procurement spend.

Figure 1: Procurement Spend by Commodity Category Fiscal Year 2025-2026



The university encourages a disciplined approach to sustainable procurement which considers the right balance of environmental, societal and economic considerations in each procurement activity. This requires a careful and thorough evaluation of procurement requirements while also exploring opportunities that are environmentally responsible and promote “healthy communities.” Individuals participating in a university procurement are required to give appropriate consideration in the evaluation process to those goods, services, and vendors that reflect a commitment to sustainability or a broader social responsibility. These include but are not limited to life-cycle costs, reusable or recycled goods, energy consumption in production and distribution, diverse vendors, fair trade products certified by Fairtrade International and the Small Producer Symbol (SPP) or demonstrated community impact measurement.

Policies and Due Diligence Processes

Procurement Operations and Supply Chain

Carleton’s [Supplier Code of Conduct](#) was published in September 2024, and establishes the importance of its suppliers in addressing forced labour and child labour within its supply chains by establishing minimum conduct standards for suppliers and subcontractors, fostering proactive engagement and collaboration between the university and its suppliers, and enhancing transparency, accountability, and trust amongst all stakeholders. The university’s Supplier Code of Conduct is informed by the provisions of

Bill S-211, and reinforces the Broader Public Sector Supply (BPS) Chain Code of Ethics as outlined in the [BPS Procurement Directive](#). Standard #3 (Social Responsibility) directly addresses human rights and labour rights, including requiring suppliers to adhere to applicable labour laws and international standards. Carleton's due diligence processes involve supplier assessments, audits, and ongoing monitoring to ensure compliance with these standards.

In the future, the Supplier Code of Conduct will be formally communicated to the university community and our suppliers through the procurement and contracting processes.

There is also a robust Procurement Policy to ensure that current legislative and regulatory requirements with respect to public entity purchases are met, including mandatory requirements related to the governing directives. This includes the following purpose: "The primary purpose of the Procurement Policy is to ensure that the acquisition of goods and services is undertaken in an open, fair, transparent, efficient, ethical, and cost-effective manner while obtaining the best value for money for the university."

Responsible Investing

Carleton's investment portfolios proactively and directly engage with Boards of Governors of investee companies and where deficiencies are indicated, concrete steps are taken to monitor and effect change.

Carleton's investment portfolios have policies in place to ensure the investment process reduces the risk of forced labour or child labour in supply chains. This includes a formal monitoring and review process, and a review of the risks associated with changing trend data. All investment managers have scrutinized the supply chain of potential investee companies. Compliance procedures are also in place to ensure operational due diligence reports are completed annually and quarterly reporting is reviewed for additional follow-up.

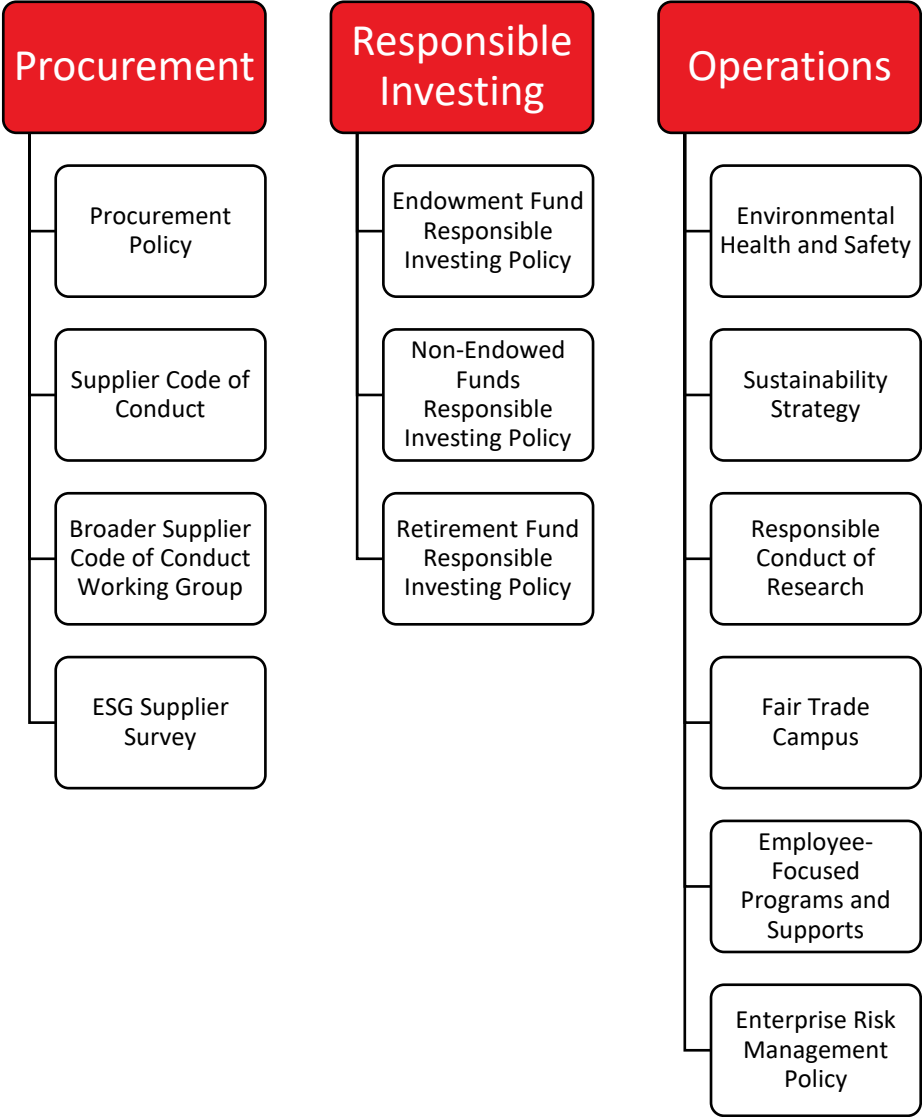
Links to related policies:

[Carleton University Supplier Code of Conduct](#)

[Carleton University Procurement Policy](#)

[Responsible Investing Policies](#)

Supporting Policies and Programs



Risk Assessment and Management

Carleton University acknowledges that certain parts of its business and supply chains could carry inherent risks of forced labour and child labour. The university has an established risk registry and framework that are used to proactively conduct risk assessments. Through these tools, the university has completed an initial supply chain risk identification exercise. In the future, this framework could include engaging with suppliers to address potential issues, fostering transparency, and diversifying sourcing to minimize dependence on potential high-risk regions.

Carleton University has soft-launched its implementation of the “Total Supplier Management” module within its eProcurement system, Jaggaer and is scheduled to fully launch in June 2026. Once implemented, new suppliers will be asked to attest to:

1. Their compliance with all university policies, including the Supplier Code of Conduct, and
2. That they do not and will not use forced labour or child labour as defined by Bill S-211, has or will take reasonable steps to prevent and reduce the risk of the use of forced labour and child labour as defined in the Act; and
3. Agreement to comply with any reasonable request for information from Carleton for the purposes of Carleton’s compliance with the Act.

In the future, the university plans to launch use of the Converged Human Rights and Environmental Due Diligence Assessment (HREDD) assessment tool and common due diligence process among universities in Ontario through [CASPAR](#).

Our investment portfolios have identified activities and supply chains that carry risk of forced and child labour being used. Additional scrutiny surrounds the consumer and retail space where products are made overseas (and sold domestically) and could be subject to this risk. We are aware, in general, that overseas suppliers can have low-cost production which could potentially exploit weak country labour standards. As a general rule, views are tested by referencing the Sustainability Accounting Standards Board (SASB) Standards under their “[Materiality Finder](#)”.

Remediation Measures (including loss mitigation)

Carleton has not identified any instances of forced or child labour requiring remediation or loss mitigation. Although the university does not currently have an institutional-wide grievance mechanism, outside of our [Whistleblowing, Financial Fraud Prevention and Reporting policy](#), to address forced labour and child labour in our supply chain, we will review best practices for a remediation framework for the purpose of reporting suspected incidents of forced or child labour in the university’s operations and supply chain.

In our investing activities, mechanisms such as a robust audit strategies undertaken by globally recognized third-party audit firms, virtual audits or shared audits ensures investees compliance with labour standards and applicable laws. Progress tracking and realignment is also undertaken.

Training

Carleton University remains committed to enhancing awareness and understanding of the requirements under S-211. As part of this commitment, Carleton University 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 S-211, and reinforce ethical procurement practices. The training emphasizes informed decision-making, proactive stakeholder engagement, and clear supplier accountability. Carleton University will continue to increase awareness of the requirements under Bill S-211 by continuing to train new staff using the OUPPMA training framework.

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.

- Module 1: Awareness of Human Rights in Supply Chains. Covers procurement’s role in ethical sourcing, key compliance requirements under Bill S-211, and identifying red flags in high-risk industries.
- Module 2: Interacting with Internal Clients on Human Rights. Focuses on legal, financial, and reputational risks, high-risk procurement areas, and balancing cost considerations with ethical decision-making.
- Module 3: Interacting with Suppliers on Human Rights. Provides strategies for setting expectations, addressing violations, conducting due diligence, and enforcing a Supplier Code of Conduct.

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 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.

Assessing Effectiveness and Next Steps

Carleton acknowledges the importance of having effective tools and processes in place to ensure the university is in compliance with all regulations and laws. Planned next steps include:

- Conduct an environmental scan of suppliers' practices and procedures through the incoming Total Supplier Management module
- Develop KPIs and Assessment Framework
- Develop an Action Plan
- Continue training opportunities through OUPPMA modules as they become available

Approval and Attestation

I attest that I have reviewed the information contained in the report for Carleton University. 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 2025-2026 fiscal year. I further attest that, in accordance with the requirements of the Act, this report has been approved by the Carleton University Board of Governors.



Prof. Wisdom Tettey
President and Vice-Chancellor

Date: April 29, 2026

I have authority to bind Carleton University