

# The Fighting Against Forced Labour and Child Labour in Supply Chains Act

May 27, 2024

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## Introduction

On January 01, 2024, a new law called the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) came into force. The aim of the Act is to implement Canada’s international commitment to combat forced and child labour by imposing reporting obligations on government institutions and certain business entities that produce goods anywhere in the world or import goods produced outside Canada. As an “Entity” under the Act, Red River College Polytechnic (hereinafter referred to as "RRC Polytech") reports as follows:

### Group 1

<b>Reporting Entity</b>	Red River College Polytechnic
<b>Financial Reporting Year</b>	2023-2024
<b>Business Numbers</b>	12238 4506 RT0001
<b>Categorization According To Act</b>	Entity
<b>Sector</b>	Education
<b>Location</b>	Manitoba, Canada
<b>A Description of the Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour, as per subsection 11(1)</b>	RRC Polytech has implemented a Sustainable and Socially Responsible Procurement Policy and is in the process of finalizing a Supplier Code of Conduct. The new Policy sets out requirements for RRC Polytech’s socially responsible procurement practices in sourcing goods and services and the Supplier Code of Conduct will require suppliers and their subcontractors to adhere to the minimum standards of ethical business practices. These ethical standards encompass minimum requirements set in national and international law including but not limited to fair labour, employee treatment, wages, and benefits, working conditions, and anti-corruption/bribery.

## Group 2

A – Structure, Activities and Supply Chains	
<b>Legal Structure</b>	RRC Polytech is a Special Act corporation, established under The Red River College Polytechnic Act C.C.S.M. c. R31.
<b>Organizational Structure</b>	RRC Polytech is governed by a Board appointed by the Manitoba Government with a President and CEO. RRC Polytech is organized by departmentation with an executive team reporting to the President and CEO.
<b>Organizational Mandate</b>	<p>The mandate is set out in Board of Governors Policy 1.0 as follows:</p> <p>"Red River College Polytechnic provides education in support of Manitoba's economic development and social well-being. Specifically, the mandate of the College is to:</p> <ul style="list-style-type: none"> <li>• Produce graduates with the necessary skills to be successful in the workplace and further their career opportunities; equipped with a global perspective, the ability to function in a diverse environment, and a capacity for continuous learning.</li> <li>• Offer a supportive environment for students to engage in the pursuit of their academic goals.</li> <li>• Partner with employers, government, educators, and communities to deliver applied learning, research and innovation that serve and respond to Manitoba's labour market needs."</li> </ul>
<b>Number of Employees</b>	2,286 as of April 30, 2024
<b>Partner Organizations</b>	Membership in Polytechnics Canada
<b>Control of Other Entities</b>	N/A
<b>Activities and Supply Chain</b>	<p>The Procurement &amp; Logistics Department is responsible for assisting academic and operational areas with the acquisition of the goods and services required to operate RRC Polytech's academic, research and support service areas. Goods and Services purchased by RRC Polytech include, but are not limited to, industrial machines, robots, vehicles, computers, software services, training and simulation equipment, office and classroom furniture, waste management services, and various consultancy services.</p> <p>Goods purchased are primarily procured from representatives or distributors of Manufacturers. Direct purchases from manufacturers</p>

	<p>where RRC Polytech is the importer account for less than 3% of purchase activity.</p> <p>RRC Polytech does not carry out manufacturing for the purpose of trade, only for the purposes of training students, research activities and other operational needs.</p>
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### B – Policies and Due Diligence Processes (In Relation to Forced Labour and Child Labour)

In 2023, RRC Polytech developed a corporate Sustainability and Social Responsibility Policy in line with its strategic objectives as outlined in the structure above. This Policy addresses the need for compliance with the fair labour practices and ethical treatment of employees, as well as the minimum standards of Canadian and Provincial Labour Laws as applicable.

This Policy is embedded in RRC Polytech’s sourcing requirements as pre-requisite for engaging vendors that do business with RRC Polytech.

A Supplier Code of Conduct is also utilized to drive suppliers' commitment to upholding the requirements of fair labour practices and ethical treatment of employees and in engaging their workforce to ensure the absence of modern slavery and child labour.

RRC Polytech is currently exploring ways to assess its supply chain for any risk of modern slavery or child labour. Policies and procedures will continue to be adjusted in the event that gaps are identified.

### C – Forced Labour and Child Labour Risks

Risk areas and actions taken by the Polytechnic to address these risks:

- Forestry, Mining & Agriculture – RRC Polytech requires Fair Trade Certification of vendors that participate in Food Product or Food Services Requests for Proposals.
- Electronics and Computer purchases – RRC Polytech requires EPEAT GOLD LEVEL certification of electronics and computers purchases.
- Garment and textile purchases – RRC Polytech will be incorporating a Supplier Code of Ethics into supplier selection as part of the Sustainable and Socially Responsible Procurement strategy and action plan.

#### D – Remediation Measures

No adverse impact has been identified in RRC Polytech's supply chain.

#### E – Remediation of Loss of Income

Not Applicable.

#### F – Training

RRC Polytech has developed a training plan as part of the Sustainable and Socially Responsible Procurement Action Plan. The training plan ensures that stakeholders receive appropriate degrees of communications or training based on their role in the organization. The Ethical Compliance component of the training addresses forced labour and child labour.

#### G – Assessing Effectiveness

RRC Polytech has not yet implemented steps to assess the effectiveness of processes to ensure that forced labour and child labour are not being used in RRC Polytech supply chains.

Assessing effectiveness is part of the Sustainable and Socially Responsible Procurement Action Plan to be implemented in future reporting periods.

## Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), and in particular section 11 thereof, I, Loren Cisyk, attest that I have reviewed the information contained in the report for Red River College Polytechnic. 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.

I have the authority to bind the organization.

Per: SIGNED

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Name: Loren Cisyk

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Title: Red River College Polytechnic Board of Governors, Chair

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Date May 27, 2024

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## PROCUREMENT DEPARTMENT CONTACT

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