



**University
of Manitoba**

2025

FIGHTING AGAINST
FORCED LABOUR AND
CHILD LABOUR IN SUPPLY
CHAINS ACT

ANNUAL REPORT

**FIGHTING AGAINST FORCED LABOUR AND
CHILD LABOUR IN SUPPLY CHAINS ACT**

2025 ANNUAL REPORT – UNIVERSITY OF MANITOBA

TABLE OF CONTENTS

1.	UNIVERSITY OF MANITOBA BOARD OF GOVERNORS SIGNED ATTESTATION	3
2.	DEFINITIONS.....	4
3.	UNIVERSITY OF MANITOBA TRADITIONAL TERRITORIES ACKNOWLEDGMENT	5
4.	DESCRIPTION OF ANNUAL REPORTING REQUIREMENTS	6
5.	UM RESPONSE TO ANNUAL REPORTING REQUIREMENTS	8
A.	STRUCTURE, ACTIVITIES AND SUPPLY CHAINS.....	8
B.	POLICIES AND DUE DILIGENCE IN RELATION TO FORCED AND CHILD LABOUR.....	9
C.	AREAS WITHIN UM CARRYING RISK OF FORCED AND CHILD LABOUR AND RISK MANAGEMENT	11
D.	MEASURES TAKEN TO REMEDIATE ANY FORCED OR CHILD LABOUR	11
E.	MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO THE MOST VULNERABLE FAMILIES THAT RESULTS FROM ANY MESURES TAKEN TO ELIMINATE THE USE OF FORCED OR CHILD LABOUR	12
F.	TRAINING PROVIDED TO UM EMPLOYEES ON FORCED AND CHILD LABOUR.....	12
G.	HOW UM ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED AND CHILD LABOUR ARE NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS.....	13
6.	REFERENCES.....	14



**University
of Manitoba**

1. UNIVERSITY OF MANITOBA BOARD OF GOVERNORS SIGNED ATTESTATION

The University of Manitoba is submitting its 2025 response to the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that, on March 25, 2025, the Board of Governors has approved the report for University of Manitoba.

University of Manitoba Board of Governors

Per: Jeff M. Leclerc, University Secretary, University of Manitoba

University of Manitoba Board of Governors

Per: Michael Benarroch, Member of the Board of Governors, President and Vice-Chancellor

2. DEFINITIONS

“AASHE”: Association for the Advancement of Sustainability in Higher Education

“CASPAR”: CAUBO-ACPAU-Sustainable Procurement- Approvisionnement Responsable, a Canada-wide inter-university working group on Sustainable Procurement

“CETA”: Comprehensive Economic and Trade Agreement

“CFTA”: Canadian Free Trade Agreement

“EPIC”: UM’s Electronic Procurement and Information Centre

“ERP”: Enterprise Resource Planner

“MASH”: Refers to regional, local, district or other forms of Municipal government, publicly funded Academics, School boards, Health, and social service entities. UM is a part of the MASH sector as defined.

“NWPTA”: New West Partnership Trade Agreement

“PS”: UM Purchasing Services

“STARS”: Sustainability Tracking, Assessment & Rating System

“UM”: University of Manitoba

3. UNIVERSITY OF MANITOBA TRADITIONAL TERRITORIES ACKNOWLEDGMENT <https://umanitoba.ca/indigenous/culture-and-protocols#traditional-territories-acknowledgement>

A Traditional Territory Acknowledgement is a reflection and expression of gratitude that recognizes the Indigenous land we occupy as a community, while promoting a shared commitment to understanding historical events that have led us to the present day.

All major events at UM include an acknowledgement of the traditional territories on which our campuses are located: the original lands of the [Anishinaabeg](#), [Ininiwak](#), [Anisininewuk](#), [Dakota Oyate](#) and Denesuline, and the National Homeland of the Red River Métis. Sharing this acknowledgement publicly is also an opportunity for the UM community to increase their awareness of Indigenous history and perspectives.

While a general acknowledgement has been written and is included below, members of the UM community are encouraged to personalize their acknowledgement and share their gratitude in a manner that honours their own reflections.

General Acknowledgement:

“The University of Manitoba campuses are located on original lands of Anishinaabeg, Ininiwak, Anisininewuk, Dakota Oyate and Denesuline, and on the National Homeland of the Red River Métis.

We respect the Treaties that were made on these territories, we acknowledge the harms and mistakes of the past, and we dedicate ourselves to move forward in partnership with Indigenous communities in a spirit of Reconciliation and collaboration.”

4. DESCRIPTION OF ANNUAL REPORTING REQUIREMENTS

Fighting Against Forced Labour and Child Labour in Supply Chains Act

11 (1) Every entity must, on or before May 31 of each year, report to the Minister on the steps the entity has taken during its previous financial year 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 by the entity or of goods imported into Canada by the entity.

Single or joint report

- (2)** An entity may comply with subsection (1) either
- (a)** by providing a report in respect of the entity; or
 - (b)** by being party to a joint report in respect of more than one entity.

Supplementary information

- (3)** The report must also include the following information in respect of each entity subject to the report:
- (a)** its structure, activities and supply chains;
 - (b)** its policies and its due diligence processes in relation to forced labour and child labour;
 - (c)** the parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk;
 - (d)** any measures taken to remediate any forced labour or child labour;
 - (e)** any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains;
 - (f)** the training provided to employees on forced labour and child labour; and
 - (g)** how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

Approval of report

- (4)** The report must be approved,
- (a)** in the case of a report in respect of a single entity, by its governing body; or
 - (b)** in the case of a joint report, either

(i) by the governing body of each entity included in the report,
or

(ii) by the governing body of the entity, if any, that controls
each entity included in the report.

Attestation of the report

(5) The approval of the report must be evidenced by

(a) a statement that sets out whether it was approved pursuant to
paragraph (4)(a) or subparagraph (4)(b)(i) or (ii); and

(b) the signature of one or more members of the governing body of each
entity that approved the report.

5. UM RESPONSE TO ANNUAL REPORTING REQUIREMENTS

A. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

We are the university for Manitoba. We are one of the country's top research universities and the largest source of skilled professionals in Manitoba. UM trains those who will build this province's future. We are a world-class university and provide the most opportunities for post-secondary students in the province with our breadth of programs, co-op opportunities, research facilities and partnerships.

See below link for University of Manitoba's organizational and administrative structure:

https://umanitoba.ca/institutional-analysis/sites/institutional-analysis/files/2023-09/UofM_Org_Chart_asofSep1_2023.pdf

UM Supply Chain operations currently reside primarily within the Procurement Services (PS) department which falls within the Financial Services business unit as per the UM Administrative Organizational Chart, found above.

UM employs a policy of centrally managed purchases, whereby the acquisition of all construction, materials, supplies, equipment, repairs and other contractual services (except for purchases for resale) are procured through Procurement Services.

PS is organized into four Purchasing Categories and one Support Services team. The Purchasing Categories consist of: Research and Sciences, Construction and Renovation, General Supplies and Services and Information Technology Goods and Services. The Support Services team assists with tactical requirements such as supplier enablement, liaising with supplier payment services and monitoring of the centralized email.

UM currently has two ERP systems that are utilized and maintained for Supply Chain operations; Ellucian BANNER and an SAP Ariba e-Procurement system named EPIC.

UM currently has over 38,000 active vendors with 75% headquartered in Canada, 15% in the United States and 10% overseas.

UM is considered part of the MASH sector, and as a public organization, abides by and follows the obligations listed within three trade agreements: NWPTA, CETA and CFTA regarding its procurements.

B. POLICIES AND DUE DILIGENCE IN RELATION TO FORCED AND CHILD LABOUR

UNIVERSITY OF MANITOBA SUSTAINABILITY POLICY, STRATEGY AND REPORTS <https://umanitoba.ca/sustainability/policy-strategy-reports#our-sustainability-policy>

SUSTAINABILITY STRATEGY 2019-2023
https://umanitoba.ca/sustainability/sites/sustainability/files/2020-10/Sustainability_Strategy_2019-2023.pdf

UM STRATEGIC PLAN [2024-2029] – HOW WE GET THERE: LEADING CHANGE TOGETHER <https://umanitoba.ca/strategic-plan>

Our community's aspirations as captured under creating knowledge that matters, empowering learners, and reimagining engagement are accompanied by a collective desire and acknowledgement of UM's responsibility to be leaders of change.

We take action to address societal issues and meaningfully contribute to the overall well-being of our internal and external communities. These actions are articulated as three fundamental commitments that encompass what we do and how we move forward—they guide us in framing our goals under each strategic theme and measuring our success in implementing this plan

UNIVERSITY OF MANITOBA MISSION, VISION, and VALUES

<https://umanitoba.ca/about-um>

MISSION

We advance learning by creating, sharing, preserving, and applying knowledge in partnership with diverse communities to promote the cultural, social, and economic well-being and health of Manitoba, Canada, and the world.

VISION

The University of Manitoba will be a vibrant and thriving community, enriched by Indigenous knowledges and perspectives. We will lead change for a better Manitoba and world.

CORE VALUES

To achieve our vision, we require a commitment to a common set of ideals. The University of Manitoba Core Values:

Belonging

We foster trust, acceptance, and mutual respect, rooted in human rights and dignity of all. We strive to create the conditions for all to be their authentic selves. We change systems and structures that exclude. We empower success through our dedication to decolonization and Reconciliation, and to a university community that centers equity, accessibility, diversity, and inclusion.

Curiosity

We value the pursuit of knowledge and uphold academic freedom. We celebrate curiosity and its essential role in learning, research, scholarly work, and creative activity. We empower the creation and sharing of knowledge in all its forms, including Indigenous knowledges and ways of knowing, to foster deeper understanding, create new connections, and address society's most pressing issues.

Impact

We partner to find solutions to societal, cultural, economic, health, and environmental issues. Through collaboration, inclusivity, empathy, and valuing diverse ways of knowing, we create global citizens. We centre community as we participate in the process of Reconciliation, and contribute to positive and meaningful change in Manitoba, Canada, and the world.

Integrity

We maintain high ethical standards and ensure ethical stewardship. We share a commitment to human dignity, open dialogue, transparency, professionalism, accountability, and collegial governance.

Well-being

We advance the personal and professional growth and academic success of our community members. Grounded in respect and compassion for each other and our community, we cultivate a supportive environment that embraces the values of mino-pimatisiwin (good life) and minoayawin (good health).

UM PURCHASING POLICY

UM Purchasing Policy states that purchases of goods and services shall be consistent with public tendering principles. Purchasing procedures shall ensure compliance with applicable legislation; selection of goods and services based on the best value taking into consideration such criteria as price, total life-cycle cost, product, or service quality, bid compliancy, supplier qualifications, experience, and reputation; and where appropriate,

consideration given to the impact on the environment, human health, and social well-being.

https://umanitoba.ca/governance/sites/governance/files/2021-05/Purchasing%20Policy%20-%202014_03_12%20RF.pdf

C. AREAS WITHIN UM CARRYING RISK OF FORCED AND CHILD LABOUR AND RISK MANAGEMENT

UM's purchases involve several high-risk categories. Clothing, electronics, food, medical supplies and equipment are some of the at-risk categories that have been identified. Managing this risk is ongoing and UM is committed to implementing several strategies within its competitive procurements to alleviate this risk such as:

- Participation in organizations that foster sustainability
- Including contractual language to ensure compliance
- Addition of criteria in competitive procurements
- Development of a Supplier Code of Conduct

D. MEASURES TAKEN TO REMEDIATE ANY FORCED OR CHILD LABOUR

UM has implemented the following mitigation strategies to prevent and reduce risks of forced labour and child labour:

UM implemented sanction screening software applications (August 2023) for screening our new and existing vendors (both individuals or companies) to determine if they have been identified with forced labour sanctions or activities. UM plans to revisit our current sanction screening software applications and look for enhancements that can be applied to increase the level of screening datasets and watchlists.

Participates in STARS (a program of AASHE) a transparent, self-reporting framework for colleges and universities to measure their sustainability performance. UM has been awarded a GOLD rating which is valid until September 22, 2025.

<https://reports.aashe.org/institutions/university-of-manitoba-mb/report/2022-08-05/>

In 2018, the UM Bannatyne campus was designated Canada's 33rd Fair Trade Campus.

<https://fairtradeprograms.ca/fair-trade-campus/>

The UM Fort Garry BookStore believes in fair labour practices and has implemented a No Sweat Policy. The BookStore requires clothing vendors who use the (UM/Bisons) brands to follow the Fair Labor Association's Code of Conduct.

<https://umanitoba.ca/bookstore/sites/bookstore/files/2021-12/fair-labor-association-codeof-conduct.pdf>

UM became a member of and participates in CASPAR, a Canada-wide inter-university working group on sustainable procurement.

<https://www.caubo.ca/community/caspar/>

CASPAR's three key objectives are:

1. Capacity building, with the aim of bringing all Canadian universities on board with sustainable procurement
2. Common efforts, to develop a common language about sustainable procurement, and, where possible, common tools (e.g., standard contract clauses, benchmarking tools, and shared key performance indicators)
3. Market monitoring, to keep abreast of industry issues, standards, or regulatory developments, and promote best practices

UM is reviewing its purchasing policies and will ensure that forced labour and child labour mitigation protocols are considered in that review

E. MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO THE MOST VULNERABLE FAMILIES THAT RESULTS FROM ANY MESURES TAKEN TO ELIMINATE THE USE OF FORCED OR CHILD LABOUR

UM is not aware of any cases where its measures taken to eliminate the use of force or child labour have resulted in loss of income to vulnerable families.

F. TRAINING PROVIDED TO UM EMPLOYEES ON FORCED AND CHILD LABOUR

UM is committed to ensure procurement staff are trained and aware of the risks of forced and child labour and are provided the proper tools to assess and remediate risk within our competitive procurements.

G. HOW UM ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED AND CHILD LABOUR ARE NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS

UM's investment in sanctions screening software ensures that if suppliers are on a sanctions list for forced and child labour, UM is aware and can take appropriate actions.

6. REFERENCES

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