



Bill S-211 : Modern Slavery Report April 1, 2023 to March 31, 2024

*This Modern Slavery Report (the "**Report**") addresses the period from **April 1, 2023** to **March 31, 2024** and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)(the "**Act**")*



1. Introduction

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. Fleming College recognizes the important role that we have in ensuring that our operations and the supply chains that support these, adhere to the highest ethical standards, including the prevention and identification of forced labour and/or child labour in our supply chain. This Report sets out the steps we have taken for the year ended March 31, 2024 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or of goods imported into Canada by Fleming College.

2. Our Business

Fleming College is a post-secondary institution in Central Ontario with campus locations in Peterborough, Lindsay, Cobourg and Haliburton. Fleming College offers full time programs in Skilled Trades, Business, Arts and Heritage, Health and Wellness, Technology, Environmental and Natural Resources, Justice, Community Development and General Arts and Sciences. The College hosts more than 6,000 full-time and 10,000 part-time students on an annual basis.

In 2024, Fleming College reported revenue of \$307 million, and a net surplus of \$41 million. The majority of Fleming College's revenue is obtained from tuition fees and operating grants. Similarly, the majority of expenditures incurred by Fleming College relate to delivery of academic programming and are comprised mainly of salaries, benefits and administrative type costs.

Further information about Fleming College, including strategic plans and annual financial plans can be found on our website - [Reports and Plans : Fleming College](#)

3. Our Policies

Through our organizational and governance policies we communicate our values and expectations, setting a high bar for ourselves, our suppliers, and our community partners. We are committed to consistently evolving and improving our approach and will be updating our policies to enforce our non-tolerance of forced labour and/or child labour in any part of our operations or supply chain.

We make efforts to ensure our activities are not having a negative impact on human rights. Our relevant policies are discussed in further detail below:



Procurement Code of Ethics

We are committed to conducting our business in a lawful and ethical manner. Our Procurement Code of Ethics (the Code) is the foundation of our procurement policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, Fleming College employees should always act lawfully, ethically and in the best interests of Fleming College.

(In fiscal 2025 we will update the Code of Ethics to include specific points regarding child and forced labour.)

Whistleblower Policy

We have established a whistleblowing process, enabling any employee of Fleming College to anonymously report various forms of misconduct, including concerns related to workplace harassment and safety, and any other sensitive issues.

The purpose of this policy is to ensure that Fleming College operations are conducted ethically and with integrity. This policy will allow any employee the opportunity to address concerns surrounding potential forced labour and/or child labour issues in our business or supply chains.

Supplier Code of Conduct (2025 Fiscal Addition)

Fleming College will be implementing a Supplier Code of Conduct in the 2025 fiscal year. The supplier code of conduct will detail the requirements and expectations we have of our suppliers and their supply chains. We expect our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate and consistently monitor and enforce our Supplier Code of Conduct in their own operations and supply chain. Our Supplier Code of Conduct will set forth our principles of inclusivity and accountability. We engage with suppliers that are committed to these same principles and suppliers commit to these standards as a condition of doing business with us.

Due Diligence

We expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

4. Assessing Our Risk

Fleming College has assessed the risk that forced labour and/or child labour is present in any of our activities or throughout our supply chains as **very low**.

A review of all international purchase orders for 2023-24 was undertaken by the Fleming College procurement team and the results showed the following:



- Fleming College does not engage any international vendors for ongoing procurement contracts, and any purchase of goods are generally one-time purchases of specialized equipment
- The majority of International purchase orders relate to student recruitment
- There was no direct procurement from countries that are deemed high risk as per the slavery ratings on [Global findings | Walk Free](#)

Our exposure to the risk of forced labour and/or child labour increases when we engage with third parties for things such as bookstore operations, cleaning and food services. However, we feel that dealing with reputable companies for these contracts keeps our overall risk at a very low level.

5. Our Commitments

Steps to Prevent and Reduce Risks of Forced and Child Labour

The requirement to identify and mitigate any risk associated with child labour and forced labour is new to the College sector, and to Fleming College. As a result, many of our existing policies and processes will need to be reviewed and revised to ensure that we are addressing the risk appropriately.

While we feel that our activities are very low risk, we will be taking steps to ensure that the possibility of forced labour and/or child labour occurring at any point in our supply chain are identified and dealt with.

These steps will include:

- Developing and implementing due diligence policies and processes that identify and address prohibition of forced labour and/or child labour
- Development and use of a supplier code of conduct that addresses any potential forced labour and/or child labour in supplier operations or their supply chain
- Including information within our procurement training materials that enables employees to identify and assess potential risk of forced labour and/or child labour
- Updating the Fleming College procurement code of conduct to include anti-forced labour and/or child labour guidelines

Remediation Measures

Fleming College has not taken any remediation measures in place, to either stop forced labour and/or child labour or to supply lost income to vulnerable families who have lost a source of income as the result of eliminating forced labour and/or child labour in our supply chains. Based on our risk assessment and business activities, we feel these measures are not applicable to our organization.



6. Our Progress and Effectiveness

Fleming College has just recently undertaken an assessment of our policies and procedures in relation to the prevention of forced labour and/or child labour. In the coming fiscal year we will be assessing the need to develop a process to measure the effectiveness of our efforts.

Our current operational model carries very little risk in relation to forced labour and/or child labour. While we plan to update policies and training materials to ensure all employees have resources available to help combat any potential forced labour and/or child labour in our operations or supply chains, we don't anticipate there will be any issues.

To ensure our suppliers are aware of our stance on forced labour and/or child labour we will be implementing a supplier code of conduct that we will require all suppliers to sign off as part of the vendor setup process. We will consider this initiative successful when 100% of vendors have signed the code of conduct.

7. Approval & Signature

This Report was approved by **Sir Sandford Fleming College of Applied Arts and Technology's Board of Governors on May 28, 2024** and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report will also be available on our website at [Reports and Plans : Fleming College](#)

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for Sir Sandford Fleming College of Applied Arts and Technology. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

DocuSigned by:

A handwritten signature in black ink that reads 'Don Gillespie'. The signature is enclosed in a blue DocuSign signature box.

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Don Gillespie

Board Chair, May 28, 2024

I have the authority to bind **Sir Sandford Fleming College of Applied Arts and Technology**