

Bill S-211 Annual Report on Fighting Against Forced Labour and Child Labour in Supply Chains

For the Financial Reporting Period of:

1 April 2024 to 31 March 2025

NORTHWESTERN POLYTECHNIC
(“NWP” or “Polytechnic”)

To be submitted to: Public Safety Canada

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For the fiscal year ending March 31, 2025

Identifying Information

Reporting entity's legal name	Northwestern Polytechnic
Financial reporting year	April 1, 2024 – March 31, 2025
Identification of a revised report	Original submission
Business number(s), if applicable	118945492
Identification of a joint report	This Report is not a joint report
Reporting obligations in other jurisdictions	None
Entity categorization according to the Act	Entity (public post-secondary institution)
Sector / industry	Public sector – Higher education
Headquarters / primary location	Grande Prairie, Alberta, Canada

Article 1 – General

This Report is submitted by Northwestern Polytechnic (“NWP”) in accordance with section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “Act”). NWP is a public post-secondary institution operating in Grande Prairie, Alberta. During the financial year covered by this Report, NWP had assets and revenues that meet the statutory thresholds for an “entity” under the Act and imported goods produced outside Canada for use in its academic, administrative, and operational activities. This Report describes the steps taken, and policies in place, to prevent and reduce the risk that forced labour or child labour is used at any stage in the importation of goods into Canada by NWP.

Article 2 – Executive Summary

NWP is committed to conducting its procurement and related activities in a manner consistent with its organizational values and the principles set out in applicable Canadian legislation. Guided by its Procurement Policy (effective December 4, 2024) and relevant human-resources policies, NWP strives to ensure that the acquisition of goods, services and construction is carried out ethically, transparently and in compliance with all governing laws, including the prohibition of forced labour and child labour.

During the reporting period, NWP’s primary focus was to (i) review internal policies for alignment with the Act, (ii) communicate initial legislative obligations to key stakeholders, and (iii) begin planning future actions to assess and address potential risks within its supply chains. As at the end of the reporting period, NWP is in the early stages of implementing formal measures and acknowledges that additional work is required. Future initiatives are outlined in the relevant Articles below.

Article 3 – Structure, Activities, and Supply Chains

Structure

NWP is a public, board-governed post-secondary institution operating under Alberta's Post-secondary Learning Act. With a primary campus in Grande Prairie, Alberta and a secondary campus in Fairview, Alberta, NWP offers a diverse range of programs, including university studies, trades, technical training, and collaborative degree programs with partner universities. Governed by a Board of Governors, the institution is led by a President and CEO, supported by an executive team managing academic, administrative, and operational

functions. NWP's mission emphasizes transformative, learner-centered education to support regional social and economic growth through academic excellence, applied research, and innovation.

Guided by its core values and strategic vision, NWP is dedicated to conducting its operations ethically and sustainably. This includes a strong commitment to upholding human rights and ensuring that all procurement and supply chain activities are free from forced labour and child labour, in alignment with Canadian and international standards.

Activities

NWP's core activities consist of delivering academic programs, applied research, student services and community engagement. The Polytechnic does not manufacture goods. Activities relevant to the Act arise primarily through:

- Importation of textbooks, educational materials, laboratory supplies, information-technology hardware, and other goods produced outside Canada; and

Supply Chains

NWP's procurement activities support a wide range of academic, research, and operational needs. NWP sources goods through open competitive procurement, cooperative purchasing agreements, and direct awards within the thresholds set by the Procurement Policy. Key supplier categories include:

- Educational and library materials (including imported textbooks)
- Information technology equipment and software
- Laboratory, instructional, and medical supplies and equipment
- Furniture, fixtures and equipment
- Facilities maintenance, construction and renovation materials
- Food services and hospitality supplies
- Tools and supplies for trade programs
- General merchandise to promote the institution

The majority of first-tier suppliers are Canadian entities. Limited direct procurement occurs from suppliers located outside of Canada. Detailed spend analytics and supplier mapping are not yet complete; these activities are part of NWP's future action plan.

Article 4 – Actions Taken in the Previous Financial Year

NWP is in the early phases of its compliance efforts under the Act. The actions undertaken so far include the following initiatives:

Policy Alignment Review

NWP's Procurement Policy was amended and approved on December 4, 2024. The Policy embeds guiding principles of regulatory compliance, environmental stewardship, and ethical conduct. Regulatory compliance expressly includes adherence to the Act and associated trade-agreement and human-rights obligations that prohibit forced labour and child labour. Other internal policies complement the Procurement Policy and NWP's efforts by further enhancing and upholding these obligations, ensuring adherence to the Act and reinforcing NWP's commitment to ethical standards.

Internal Awareness

Senior leadership and the Financial Services and Procurement teams were briefed on the requirements of the Act and corresponding Government of Canada guidance.

Preliminary Supplier Scan

Procurement personnel conducted an informal scan of major contractual arrangements to confirm that standard terms and conditions require vendors to comply with applicable Canadian law. No instances of forced or child labour were identified through this limited review.

Article 5 – Policies and Due-Diligence Processes

Existing Policies

The following internal policies contain elements relevant to ethical procurement, employee conduct, and risk management:

- **Procurement Policy** – Requires compliance with all applicable laws, regulations and trade agreements, supports open and non-discriminatory purchasing, and emphasizes ethical conduct and risk management. The Policy empowers Procurement Officers to impose standards on vendors and to reject bids from suppliers that fail to meet legal or ethical requirements.
- **Respectful Workplace Policy** – Promotes a work environment free from discrimination and harassment.

- **Recruitment and Selection Policy, Workplace Accommodation Policy, Performance Management Policy** – Uphold fair treatment and inclusivity within NWP’s workforce.

These policies undergo regular review and updates to ensure they remain aligned with current legislative requirements and industry best practices. This ongoing process helps maintain the relevance and effectiveness of the policies, ensuring compliance and promoting ethical standards across all aspects of NWP’s operations.

Current Due-Diligence Processes

At present, NWP relies on the representations and warranties contained in its standard purchase order terms and conditions and cooperative purchasing agreements, which obligate vendors to comply with Canadian law, including prohibitions against forced and child labour. No formal supplier audits or risk-assessment questionnaires specific to forced or child labour were conducted during the reporting period.

Planned Enhancements

To further align with the Act, NWP plans several enhancements to strengthen procurement practices and due diligence. These initiatives aim to mitigate risks of forced and child labour in supply chains, ensuring ethical compliance:

- Develop a Supplier Code of Conduct explicitly addressing forced labour and child labour expectations. This Code of Conduct will include a review and assessment of each Canadian-based supplier’s Bill S-211 publicly available policy, when applicable. If a supplier is required to have such a public policy, but does not, this will also form part of NWP’s assessment.
- Integrate forced labour and child labour considerations into evaluation criteria for applicable RFx processes.
- Establish a procedure for escalation, investigation, and corrective action where potential non-compliance is identified.

Article 6 –Business and Supply Risks and Risk Assessment Steps

NWP has not yet completed a formal risk-mapping exercise. Based on preliminary observations, potential risk areas include:

- Textbooks and printed educational materials manufactured outside Canada;

- Information-technology hardware components sourced through global supply chains; and
- Apparel or promotional items, if procured directly from overseas manufacturers.

Steps Taken to Assess and Manage Risk

No systematic risk-assessment or supply-chain mapping was undertaken during the reporting period. NWP is developing a structured approach, drawing on Government of Canada guidance, to be implemented in the next financial year. Planned steps include:

- Consolidating procurement data to identify countries of origin for goods;
- Prioritizing supplier categories for enhanced due diligence based on geographic and sector-specific risk indicators; and
- Engaging high-risk suppliers to obtain additional assurances or certifications.

Article 7 – Measures Taken to Remediate Forced Labour or Child Labour

NWP did not identify any instances of forced labour or child labour in its activities or supply chains during the reporting period. Accordingly, no remediation measures were required or taken. NWP is developing protocols to address remediation promptly should future incidents be identified.

Article 8 – Measures Taken to Remediate Loss of Income to Vulnerable Families

Because no instances of forced or child labour were identified, NWP did not take measures to remediate loss of income to vulnerable families. Should remediation be required in the future, NWP will assess appropriate actions in consultation with affected stakeholders and in accordance with Government of Canada guidance.

Article 9 – Training Provided to Employees

While no formal training specific to forced labour or child labour in supply chains was delivered during the reporting year, NWP is actively recruiting for a central procurement role. The individual filling this role will be made aware of Bill S-211 and its requirements. NWP intends to implement structured training for staff involved in procurement and contract management in the next fiscal year, and to make resources available institution-wide thereafter.



Article 10 – Assessment of Effectiveness

NWP has not yet established performance indicators or monitoring mechanisms to evaluate the effectiveness of measures to prevent and reduce the risk of forced labour and child labour. Development of metrics (e.g., percentage of spend covered by supplier self-assessments, number of supplier engagements, training completion rates) is planned for the next reporting cycle.

Article 11 – Approval and Attestation

In accordance with section 11(4) of the Act, I attest that:

- This Report has been approved by the Board of Governors of Northwestern Polytechnic; and
- I have reviewed the information contained in the Report. Based on my knowledge, and having exercised reasonable diligence, I attest that the information is true, accurate and complete in all material respects for the purposes of the Act for the reporting year indicated above.

Vanessa Sheane
President

I have the authority to bind Northwestern Polytechnic

Date: May 29, 2025