

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

For the Financial Reporting Period of:

1 April 2025 to 31 March 2026

**NORTHWESTERN POLYTECHNIC**  
**(“NWP” or “Polytechnic”)**

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***To be submitted to Public Safety Canada***

Issued: May 2026

For the fiscal year ending March 31, 2026

**Identifying Information**

Reporting entity’s legal name	Northwestern Polytechnic
Financial reporting year	April 1, 2025 – March 31, 2026
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. This is NWP’s second annual report under the Act. It builds upon NWP’s initial report for the fiscal year ending March 31, 2025, and describes the progress made during the current reporting period.

## **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 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 continued to build upon the foundational compliance efforts described in its first annual report. Key actions included the adoption of a Supplier Code of Conduct as an appendix to the Procurement Policy, the integration of ethics and goods-sourcing questions into the RFP process, the hiring of dedicated procurement personnel, and the commencement of planning for a vendor/supplier onboarding questionnaire through a new enterprise resource planning (ERP) system. NWP acknowledges that its compliance framework continues to mature and that additional work remains. 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. 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.

### **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 remain in progress. NWP is implementing a new ERP system (as described further in Article 4), which is expected to support enhanced procurement data consolidation and supplier mapping capabilities upon completion.

## **Article 4 – Actions Taken in the Previous Financial Year**

During the reporting period, NWP continued to advance its compliance efforts under the Act. Building on the foundational steps described in its first annual report – including the 2024 Procurement Policy alignment review, internal awareness briefings, and a preliminary supplier scan – NWP undertook the following additional initiatives:

### **Supplier Code of Conduct**

NWP developed and adopted a Supplier Code of Conduct, which has been incorporated as an appendix to the Procurement Policy. The Supplier Code of Conduct explicitly addresses NWP's expectations regarding forced labour and child labour and includes a requirement that Canadian-based suppliers subject to the Act maintain publicly available compliance policies where applicable. Where a supplier is required to have such a public policy but does not, this forms part of NWP's supplier assessment.

### **Procurement Process Enhancements**

NWP has begun integrating ethics and goods-sourcing questions aligned with the Act into its Request for Proposals (RFP) process. NWP is also assessing options to incorporate forced labour and child labour considerations into its current Vendor Approval forms and purchase order terms and conditions.

### **Enterprise Resource Planning (ERP) Implementation**

NWP is in the process of implementing a new enterprise resource planning (ERP) system. Upon completion (anticipated December, 2026), the ERP system will support a vendor/supplier onboarding questionnaire designed to collect information relevant to the Act as part of the standard supplier onboarding process.

### **Hiring of Procurement Personnel**

A dedicated procurement position has been filled. The individual in this role has been tasked with developing procurement staff training on forced labour and child labour risks in supply chains, and with supporting the implementation of the initiatives described in this Report.

### **Assessment of Training and Escalation Frameworks**

NWP is reviewing awareness and training questionnaire models, as well as escalation and effectiveness processes used by comparable institutions, with a view to adapting similar tools for use at NWP.

## 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. A Supplier Code of Conduct, adopted during the reporting period, is appended to the Procurement Policy and sets out NWP's expectations regarding forced labour and child labour in supply chains.
- **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

NWP continues to rely 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. During the reporting period, NWP adopted a Supplier Code of Conduct and began integrating ethics and goods-sourcing questions into its RFP process. NWP is also assessing options to strengthen forced labour and child labour provisions in its Vendor Approval forms and purchase order terms and conditions. No formal supplier audits were conducted during the reporting period; however, NWP's new ERP system will support a vendor/supplier onboarding questionnaire to collect compliance-related information from suppliers.

### Continuing and Future Enhancements

To further align with the Act, NWP plans the following additional steps to strengthen its procurement practices and due diligence:

- Complete the integration of ethics and goods-sourcing evaluation criteria into all applicable RFP processes, including alignment with the requirements of the Act.
- Finalize the implementation of the new ERP system and launch the vendor/supplier onboarding questionnaire to systematically collect information relevant to forced labour and child labour compliance as part of the standard supplier onboarding process.
- Establish a procedure for escalation, investigation, and corrective action where potential non-compliance with the Supplier Code of Conduct or applicable laws is identified.
- Update Vendor Approval forms and purchase order terms and conditions to include express provisions addressing forced labour and child labour.
- Review and assess each Canadian-based supplier's publicly available Bill S-211 report, where applicable, as part of NWP's ongoing supplier assessment process.
- Develop and implement structured training for procurement and contract management staff (described further in Article 9 below).
- Develop metrics and monitoring mechanisms to evaluate the effectiveness of these measures (described further in Article 10 below).
- Consult recognised international risk assessment tools, such as the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor and Government of Canada guidance, to inform the prioritisation of supplier categories for enhanced due diligence.

### **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**

While NWP has not yet undertaken a comprehensive, systematic risk-assessment or supply-chain mapping exercise, it has made progress toward this goal. The adoption of the Supplier Code of Conduct and the integration of ethics and goods-sourcing questions into the RFP process represent initial steps in assessing supplier risk. NWP's planned ERP system

implementation is expected to enable more structured procurement data consolidation and supplier mapping. Planned steps continue to 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 continues to develop 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**

No formal, institution-wide training specific to forced labour or child labour in supply chains was delivered during the reporting period. However, NWP made meaningful progress toward implementing a structured training program. A dedicated procurement position was filled during the reporting period. The individual in this role has been made aware of the Act and its requirements and has been tasked with developing staff training on forced labour and child labour risks in supply chains. NWP is reviewing awareness and training questionnaire models used by comparable institutions, with a view to adapting a similar tool for use at NWP. 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 formal performance indicators or monitoring mechanisms to evaluate the effectiveness of its measures to prevent and reduce the risk of forced labour

and child labour. As noted in Article 4, NWP is reviewing frameworks used by comparable institutions with a view to adapting similar tools for measuring effectiveness. Development of metrics remains a priority for NWP. Planned indicators include the percentage of procurement spend covered by supplier self-assessments, the number of supplier engagements on forced labour and child labour issues, and training completion rates among procurement and contract management staff.

### **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

**[Original signed by Vanessa Sheane, President & CEO]**

I have the authority to bind Northwestern Polytechnic

Date: May 31, 2026