

Brock University

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

Public Safety Canada Report

May 2026

Brock University's 2026 Annual Report On Fighting Against Forced Labour and Child Labour in Supply Chains

Reporting entity's legal name: Brock University

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Entity categorization according to the Act: Entity (University)

Sector/industry: Public Sector / Higher Education

Location: St. Catharines, Ontario, Canada

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About Brock University

Located in the scenic Niagara region, Brock is a progressive, welcoming university set in a safe and pleasant community that is just an hour from the GTA. Brock's main campus sits atop the Niagara Escarpment — a UNESCO World Biosphere Reserve — overlooking the city of St. Catharines. With nearly 19,000 students engaged in more than 100 undergraduate and graduate programs in seven diverse Faculties, Brock's academic excellence is enriched by renowned experiential learning opportunities and a highly rated student experience. Brock currently operates 3 campuses, all of which are located and operated in Ontario, Canada.

As part of Brock University's Strategic Plan, the University's purpose is for transforming people, reimagining the future through curiosity, creativity, and courage. We are committed to our strategic direction: shaping tomorrow through research, discovery and knowledge, building sustainable futures, realizing you matter, and bringing the world to Brock, and Brock to the world. As stewards of public and private resources, the University holds itself accountable for performance and outcomes, particularly in promoting ethical practices within our supply chain. We are dedicated to preventing and reducing the risks of forced and child labour by upholding rigorous standards in the evaluation and selection of suppliers. This ensures that all operations align with our values of human dignity, fairness, and respect for human rights, while prioritizing sustainability, ethical sourcing, and fair labour practices. [Brock University Strategic Plan 2025-2030 \(brocku.ca\)](https://www.brocku.ca/strategic-plan)

In this annual report, we outline information as required under section 11(1) and 11(3) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act. Specifically, we describe the steps Brock has taken during the 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 Brock.

As a Canadian public university whose core activities focus on education and research, Brock's procurement activities primarily involve services and domestically sourced goods, with limited direct import activity relative to its overall procurement profile.

Reporting Entity and Structure

Brock University was incorporated in 1964 through The Brock University Act. The University is led by a bicameral system of governance consisting of two governing bodies, the Board of Trustees and the Senate. The Board of Trustees is responsible for the governance, conduct, management and control of the University and of its property, revenues, expenditures, business and affairs. The Senate is responsible for the educational policy of the University and, with the approval of the Board where expenditures are involved, may enact by-laws and regulations for the conduct of its affairs.

Brock has a well-defined organizational structure that supports its academic and administrative functions. There are approximately 6,000 full and part-time employees working at Brock. All employees work in Canada and are subject to Canadian labour laws.

Activities and Supply Chain

Activities

Brock's core business activities revolve around provision of educational services, advancement of research and development initiatives, and community engagement.

Historically, Brock operated a Campus Store offering textbooks, course materials, electronics, office supplies, and promotional merchandise and apparel. Effective May 2025, Campus Store operations were outsourced to an external service provider. As a result, Brock no longer directly imports goods for resale through campus retail operations.

Brock does not manufacture or produce goods for sale/resale.

Supply Chain

Brock sources the majority of goods and services used in its operations from Canadian suppliers.

Brock University's total procurement spend for fiscal reporting year May 1, 2025, to April 30, 2026, is approximately \$141M of which approximately:

- 92% is with Ontario suppliers and
- 96% is with Canadian suppliers

This leaves approximately \$6 million of spend sourced from suppliers located outside of Canada.

In many cases, purchases from international suppliers are made through established research suppliers or distributors serving the academic sector.

Business Activities Related the Importation of Goods

Brock purchases, and in some cases, imports goods to support the administration of academic and student services, research and development, marketing and communications and facilities management.

Direct imports are primarily associated with research activities, scientific equipment, laboratory supplies, and specialized operational equipment that may not be available through Canadian distributors.

Related supply chain activities include:

- Acquisition of goods and services needed for University operations (information technology, office supplies, lab equipment, facilities management)
- Athletics (apparel, equipment, and supplies for sports teams)
- Student Supplies (lab supplies, classroom supplies, art supplies)

- Acquisition of goods for research (lab supplies, chemicals, and equipment)8 residences providing accommodation to students
- Campus retail operations provided by an external service provider; Brock does not directly import goods for resale through campus retail activities

Direct imports into Canada

Of the \$6 million spend outside of Canada, direct importations of physical goods crossing the Canadian border represent approximately \$990,000 or 0.6% of the University's total spend. This represents a decrease from \$1.6 million (approximately 1%) in the previous reporting year, largely due to the outsourcing of Campus Store operations in May 2025.

These imports originated from 33 countries, with the majority originating from:

- USA (61%)
- China (16%)
- United Kingdom (11%)
- France (3%)
- Netherlands (1%)
- Germany (1%)
- Japan, (1%)
- Portugal (1%)
- Imports from the remaining 25 countries were less than 1% each (5% Total)

Categories of Imported Goods:

Analysis of customs import data and HS code classifications, indicates that the majority of goods imported directly by Brock in the previous fiscal year fall into the following categories:

- Research and Laboratory materials
 - Lab reagents, biological materials and chemicals
 - Rodent bedding and animal feed
 - Specialized research consumables
- Scientific and laboratory equipment
 - Scientific instruments and measuring devices
 - laboratory equipment and glassware
 - specialized technical components and replacement parts used in research and laboratory environments
- Information technology and electronic equipment
 - computers, electronic components, and technical accessories used for academic and administrative purposes
- Books and printed academic materials
- Operational and Institutional Supplies
 - Office and classroom supplies
 - Limited quantities of athletics apparel, promotional materials, and specialized equipment.

Many of these goods are specialized scientific materials or equipment procured through established research suppliers serving the academic sector.

Supply Chain Risk Context

Brock University is primarily a service-based educational institution, and the importation of goods is incidental to its core activities of teaching, research, and community engagement.

Direct imports represent a small proportion of the University's overall procurement activity (approximately 0.6% of total spend) and are primarily limited to specialized research materials, laboratory supplies, and scientific equipment used in academic research and teaching activities.

The majority of Brock's procurement occurs through Canadian suppliers and distributors, and a significant proportion of direct imports originate from the United States and other member countries of the Organisation for Economic Co-operation and Development (OECD). OECD is a group of countries that generally maintain established labour laws, regulatory oversight, and internationally recognized labour protections, which can reduce certain supply chain labour risks.

Brock continues to monitor its procurement activities and supply chains through analysis of procurement and customs data and will continue to enhance visibility into its supply chains as part of its efforts to support responsible and ethical sourcing practices.

Policies and Due Diligence

Brock University maintains policies and due diligence practices designed to support responsible procurement and reduce the risk of forced labour and child labour within its operations and supply chain. These include:

- Ontario Broader Public Sector Procurement Directive
- Procurement Policy and Procedures
- Supplier Code of Conduct
- Investment Policy
- Fair Trade Campus Certification

Ontario Broader Public Sector Procurement Directive

As an organization that is governed by the Ontario Broader Public Sector Procurement Directive, Brock University engages in ethical, fair, and transparent procurement practices which align with the Supply Chain Code of Ethics contained within the Directive.

The University participates in collaborative purchasing initiatives where appropriate, including partnerships with the Ontario Education Collaborative Marketplace (OECM) and Vendor of Record (VOR) arrangements offered by Supply Ontario. These collaborative procurement frameworks incorporate requirements for supplier compliance with applicable ethical, labour,

and regulatory standards. As part of these arrangements, OECM requires suppliers to attest to compliance with ethical sourcing and employment standards, including adherence to internationally recognized labour practices, supporting the University's commitment to responsible procurement and alignment with the objectives of Bill S-211.

The Directive also incorporates requirements under the Building Ontario Business Initiatives Act (BOBIA), established by the Ontario government, as of April 1, 2024, which requires the University to give preference to Ontario businesses for the procurement of all goods and services, wherever feasible. The Province has since enacted Bill 72, the Buy Ontario Act (Public Sector Procurement), 2025, which will repeal BOBIA and introduce a new framework intended to prioritize Ontario and Canadian goods and services in public sector procurement. At the time of this report, implementing directives and guidance under the Buy Ontario Act have not yet been released. Until such directives are issued, the existing requirements under BOBIA and related procurement policies remain in effect, and Brock continues to comply with those requirements while monitoring developments related to the new legislation.

Procurement Policy and Procedures

[Information for vendors \(brocku.ca\)](https://brocku.ca)

Brock University's Procurement Policy and Procedures establish the principles and processes governing the acquisition of goods and services.

The policy requires procurement decisions to be made in an objective manner while taking into account social factors, including the policies or practices of any supplier that affect freedom of association, payment of a living wage, non-discrimination on grounds protected by the Ontario Human Rights Code, freedom from intimidation, the right to a safe and healthy working environment, as well as the right to freely choose employment, regardless of whether that supplier is located inside or outside Ontario.

Procurement Services may also consider social and environmental factors alongside financial considerations when evaluating suppliers. Through these practices, the University seeks to ensure that individuals within the supply chain are treated with dignity and respect and that suppliers uphold responsible labour practices.

These procurement practices support the University's broader due diligence efforts to promote responsible sourcing and reduce the risk of forced labour and child labour within its supply chains. They are also consistent with the Supply Chain Code of Ethics under the Ontario Broader Public Sector Procurement Directive, which promotes ethical, accountable, and socially responsible procurement.

Supplier Code of Conduct

As part of the University's ongoing efforts to combat forced and child labour in our supply chains, Brock has adopted a new Supplier Code of Conduct (SCOC). This code, developed with input from various industry and university sources, including the Ontario University Professional Procurement Management Association (OUPPMA) and major multinational organizations, sets minimum standards for suppliers while encouraging them to exceed industry benchmarks. The

SCOC is designed to foster proactive engagement and collaboration with suppliers to enhance ethical, social, and environmental performance, with a focus on transparency and accountability.

During the reporting period, Brock implemented the Supplier Code of Conduct across its procurement processes. The SCOC has been incorporated into procurement documentation, including competitive solicitation documents, supplier contracts, and standard purchasing terms. Suppliers are expected to comply with the SCOC as a condition of doing business with the University.

For procurement activities identified as having elevated supply chain risk, the University may request that suppliers formally acknowledge the SCOC and complete supplier due diligence questionnaires addressing labour practices within their operations and supply chains.

The SCOC also communicates the University's expectation that suppliers apply similar standards within their own supply chains, including compliance with applicable labour laws and internationally recognized human rights principles.

Supply Chain Code of Ethics

Brock University is committed to acting in an ethical, legally compliant, and socially responsible manner and requires our staff to adhere to similar standards. We have a clear code of behavior for day-to-day activity undertaken on behalf of the University. The Supply Chain Code of Ethics, established under the Ontario Public Sector Procurement Directive, sets out the minimum ethical standards and business conduct requirements for staff, students and any individuals that procure goods or services on behalf of the University. These standards are aligned with applicable laws and ethical principles in Canada and Ontario.

Conflict of Interest and Ethical Conduct

Brock University maintains policies governing conflicts of interest and ethical conduct to support transparency and accountability in decision-making. Employees involved in procurement and contracting activities are required to disclose potential conflicts of interest and conduct business in a fair and impartial manner. These policies help ensure that procurement decisions are made objectively and support responsible supply chain practices.

Investment Policy

Brock University maintains an [Investment Policy](#) that incorporates consideration of environmental, social, and governance (ESG) factors in investment decision-making where appropriate.

The University recognizes the United Nations Principles for Responsible Investment (UNPRI) as a framework for responsible investing and encourages its investment managers to consider ESG factors as part of their investment processes where such factors may influence long-term financial performance and risk.

In accordance with its fiduciary responsibilities, Brock seeks to balance responsible investment practices with the objective of achieving sustainable long-term returns. Investment managers

are expected to consider relevant ESG factors, where appropriate, when evaluating investment opportunities and managing portfolio risks.

These practices complement the University's broader commitment to responsible governance and ethical business conduct.

Fair Trade Campus Certification

Brock is recognized as a Fair Trade Campus – Agricultural Products designated by Fairtrade Canada. Fair trade is a market-based system that uses informed consumer support to influence international trade and business practices toward greater social and environmental sustainability. As a response to conventional trade systems, which have very often contributed to poverty and poor working conditions within developing countries, fair trade aims to build an alternative approach based on mutually beneficial relationships between producers and consumers.

Future Initiatives

Brock is committed to strengthening due diligence efforts to reduce the risk of modern slavery in our operations and supply chains.

In the upcoming fiscal year, the University plans to implement Sustainable Procurement Procedures that will provide additional guidance for procurement staff and campus purchasers. These procedures will incorporate recommended eco-labels, certifications, and responsible sourcing practices designed to support ethical and sustainable procurement.

The procedures will also include guidance for procurement categories commonly associated with elevated supply chain risks, including electronics, furniture, promotional products, apparel and printing and paper products, and will encourage the use of recognized certifications and responsible sourcing standards where appropriate.

Through these measures, Brock aims to enhance visibility into supply chain practices and strengthen its approach to responsible procurement.

Supply Chain Risks

Risk Identification Approach

Brock University assessed potential risks of forced labour and child labour within its activities and supply chains using several sources and methods, including:

- guidance from the Canadian Collaboration for Sustainable Procurement (CCSP) identifying high-risk public sector procurement categories
- U.S. Department of Labor's "[List of Goods Produced by Child Labor or Forced Labor](#)"
- analysis of the University's procurement spend by commodity category

- review of direct import transactions and country of origin data
- supplier engagement through the Brock University Supplier Code of Conduct and supplier due diligence questionnaires

This assessment was conducted to identify areas where the University's procurement activities may intersect with sectors or regions that carry elevated risks of forced labour or child labour in global supply chains.

Potential Risk Areas

Brock reviewed these categories in relation to the University's overall procurement profile, including the relative value of institutional spend within each category. While these areas represent a small proportion of the University's overall procurement spend, and many purchases are made through Canadian suppliers and distributors, Brock recognizes that forced labour or child labour may still exist within global supply chains associated with certain sectors.

Based on this assessment, Brock identified several procurement categories where potential supply chain risks may exist due to the nature of the goods or global manufacturing patterns.

These include:

- apparel and garments
- promotional merchandise
- electronics and computing equipment
- food and beverage products
- paper and printed materials
- furniture and interior furnishings
- construction materials

Direct import transactions and country-of-origin information were also reviewed to assess whether imported goods originated from jurisdictions associated with elevated labour risks. Direct imports represent a very small proportion of the University's total procurement activity, and the majority of procurement continues to occur through Canadian suppliers and distributors.

Many goods purchased by the University are sourced through Canadian suppliers even where the goods may have been manufactured outside Canada. As a result, Brock's direct visibility into upstream manufacturing supply chains may be limited, but the University continues to work with suppliers to support responsible and ethical sourcing practices.

Given that the majority of the University's procurement occurs through Ontario and Canadian suppliers, and that direct imports represent a very small proportion of total procurement activity, Brock's direct exposure to global manufacturing supply chains is relatively limited, although risks may still exist through indirect suppliers.

Risk Context

The identification of potential risk areas does not indicate that forced labour or child labour has been identified within Brock University's activities or supply chains. Rather, it reflects the University's efforts to consider how its procurement activities may intersect with sectors or regions where such risks have been identified globally. Brock uses this assessment to inform its procurement practices and supplier engagement activities in order to support responsible sourcing and ethical labour practices.

Measures Taken to Manage Risks

Brock University has implemented several measures to help manage potential risks of forced labour and child labour within its procurement activities and supply chains.

- **Supplier Code of Conduct:**

As outlined in the Policies and Due Diligence section above, Brock implemented its Supplier Code of Conduct (SCOC) across procurement processes during the reporting period.

For procurement activities identified as having elevated supply chain risk, suppliers may be required to formally acknowledge the SCOC and complete supplier due diligence questionnaires addressing labour practices within their operations and supply chains.

Brock will continue to integrate SCOC into procurement processes and supplier engagement activities as part of its ongoing efforts to promote responsible sourcing and ethical labour practices within its supply chains.

- **Food Service Provider Oversight:**

Food and beverage products were identified as a procurement category that may carry potential supply chain risks due to the global nature of agricultural production and distribution.

Brock's primary food service provider supplies food, beverage, and related services across campus. During the reporting period, the provider acknowledged the University's Supplier Code of Conduct and completed a supplier due diligence questionnaire addressing labour practices within its operations and supply chains. The provider maintains policies addressing human rights and labour standards and requires suppliers within its supply chain to comply with applicable laws and internal codes of conduct.

The provider has indicated that a significant portion of its food procurement is sourced domestically, with more than 90% of protein purchases originating from Ontario and over 95% sourced within Canada. Approximately 90% of produce is sourced locally, with seasonal adjustments made to maintain high Canadian content during winter months. The provider's primary broadline distributor also sources a majority of products from Canadian suppliers.

Documentation provided by the supplier identifies numerous farms and regional producers supporting its local sourcing program, demonstrating traceability to producers located primarily within Ontario agricultural regions.

The provider's emphasis on sourcing food products from Ontario and Canadian producers, along with traceability to regional farms and suppliers, supports greater transparency in the supply chain and may reduce exposure to certain labour risks that can occur in more complex international agricultural supply chains. Because a significant portion of food products served on campus are sourced domestically, the University's food procurement supply chain is generally shorter and more regionally concentrated, which can support improved transparency and oversight.

In addition to the primary food service vendor, several third-party food and beverage providers operate on campus. Certain vendors maintain responsible sourcing programs designed to address labour and human rights risks within their supply chains. For example, Tim Hortons utilizes the Enveritas Certification, which evaluates social, environmental, and economic criteria aligned with international labour standards, and Starbucks utilizes the Coffee and Farmer Equity (C.A.F.E.) Practices program, which promotes responsible sourcing and prohibits the use of child labour within coffee supply chains.

- **Athletic Apparel Procurement:**

Procurement documents for athletic apparel require garment manufacturers to demonstrate certification through either WRC (Worker Rights Consortium), FLA (Fair Labour Association) certified or equivalent standards addressing labour practices within apparel manufacturing supply chains.. The University's athletic apparel supplier has provided a code of conduct that outlines the expectations and minimum employment standards including voluntary employment, minimum age requirements, and compliance with labour laws within current factories.

- **Campus Store Operations:**

Campus Store operations were outsourced to a third-party operator in May 2025. As part of establishing the service agreement, the operator acknowledged Brock's Supplier Code of Conduct and completed a supplier due diligence questionnaire addressing ethical sourcing practices.

Ongoing and Future Measures

We will continue to primarily engage Ontario-based and/or Canadian suppliers to reduce exposure to potential labour risks within global supply chains. By advocating for the use Ontario suppliers with our University, we aim to minimize the risk of outsourcing good and services to foreign suppliers that might use child or forced labour sources in their direct or indirect resources.

Brock will also continue to integrate ethical sourcing expectations into procurement processes, particularly for the procurement categories identified as having elevated supply chain risk.

In the upcoming fiscal year, Brock plans to establish campus-wide preferred supplier arrangements for promotional and novelty items. Procurement documents for these arrangements will incorporate requirements and evaluation criteria addressing ethical sourcing and supply chain labour practices.

Brock will continue to enhance its processes for identifying, assessing, and addressing potential supply chain risks. The University will continue to review and refine its procurement practices, supplier engagement activities, and due diligence processes to improve visibility into its supply chains and support responsible sourcing.

Remediation Efforts

There is no evidence of instances of forced labour or child labour in the University's activities and supply chains and it is not anticipated that the University's efforts to prevent and reduce risks for forced labour and child labour have resulted in any loss of income. Accordingly, no measures have been taken in this area.

Training on Forced and Child Labour

Brock University provides training and awareness activities to support compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (S-211)* and to promote responsible procurement practices.

Procurement Services collaborates with the Ontario University Professional Procurement Management Association (OUPPMA) to develop a shared training framework for procurement professionals across the Ontario university sector. The objective of this framework is to equip procurement professionals and university staff with the knowledge and tools necessary to recognize and mitigate risks of forced labour and child labour in supply chains, support compliance with S-211, and reinforce ethical procurement practices.

Module 1 – Awareness of Forced and Child Labour in Supply Chains

During the reporting period, Module 1: Awareness of Forced and Child Labour in Supply Chains was developed by OUPPMA and delivered to Procurement Services staff at Brock University. This training focused on building foundational awareness of human rights risks in global supply chains, identifying potential indicators of forced labour or child labour, and understanding the role procurement professionals play in mitigating these risks.

Module 2 – Awareness Training for the Brock Community

As part of the broader training framework, Module 2 has been developed to expand awareness training to a wider audience of university staff and community members involved in purchasing activities. This module is designed to provide practical awareness of forced and child labour risks in supply chains and promote responsible purchasing practices across the University.

The training may be delivered through an online learning format or webinar and will be offered on an optional basis to members of the Brock community involved in procurement-related activities.

Module 2 will incorporate awareness materials developed through sector collaboration, including a human rights and modern slavery awareness video produced by CASPAR (Canadian Association for Sustainable Procurement).

Supporting training materials and guidance will also be made available through the University's internal SharePoint site, ensuring that staff and community members have ongoing access to information related to responsible procurement and supply chain risks.

In the upcoming fiscal year, Brock also intends to incorporate awareness of its Sustainable Procurement Procedures into its training protocol. These procedures will provide additional guidance on responsible sourcing practices, recognized certifications and eco-labels, and procurement considerations for higher-risk commodity categories.

These training initiatives also support awareness and implementation of the University's Supplier Code of Conduct and reinforce expectations related to responsible sourcing and ethical labour practices within Brock's supply chains.

Procurement Services will continue to monitor training needs and provide updates to relevant institutional stakeholders as the University's responsible procurement practices and due diligence processes evolve.

Assessing Effectiveness

Brock University monitors the effectiveness of its policies, procedures, training initiatives, and supplier engagement measures to assess progress in preventing and reducing the risks of forced labour and child labour across all its business operations and supply chains.

As part of this process, Procurement Services monitors procurement data, supplier performance, and training activities, and periodically reviews relevant policies and procedures. The University tracks a number of Key Performance Indicators (KPIs) to support ongoing evaluation and continuous improvement in responsible procurement practices and supply chain due diligence.

Relevant KPIs reviewed include:

- % of local sourcing by Food Service Provider*
- Fair Trade Compliance by Food Service Provider*
- % of spend with Canadian suppliers
- % of spend of direct imports originating from jurisdictions associated with elevated labour risks
- # of higher-risk procurements incorporating responsible sourcing requirements, including the Supplier Code of Conduct

- % of Procurement staff who have received Forced Labour and Child Labour training
- % of Brock Community who have received Forced and Child Labour awareness training

** Failure to meet the required KPI measurements results in a financial penalty to the supplier*

These indicators help the University monitor progress in strengthening responsible procurement practices and enhancing awareness of forced labour and child labour risks within its operations and supply chains.

Approval and attestation

This report has been approved by the Brock University Board of Trustees in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Signed: 

Name: Anne McCourt

Title: Chair, Brock University Board of Trustees

Date: May 11, 2026

I/We have authority to sign on behalf of Brock University