



**FOR APPROVAL**

**PUBLIC**

**OPEN SESSION**

**TO:** Business Board

**SPONSOR:** Jeff Lennon, Chief Financial Officer  
**CONTACT INFO:** 416-978-2065, [jeff.lennon@utoronto.ca](mailto:jeff.lennon@utoronto.ca)

**PRESENTER:** Sandra Nelson, Executive Director, University Procurement  
**CONTACT INFO:** 416-978-6300, [sandy.nelson@utoronto.ca](mailto:sandy.nelson@utoronto.ca)

**DATE:** April 15, 2026, for April 22, 2026

**AGENDA ITEM:** 4

**ITEM IDENTIFICATION:**

Fighting Against Forced Labour and Child Labour in Canadian Supply Chains: University of Toronto Annual Report 2026

**JURISDICTIONAL INFORMATION:**

The Business Board is responsible for consideration of policy and for monitoring matters affecting the business affairs of the University.

**GOVERNANCE PATH:**

1. Business Board [for approval] - April 22, 2026

**PREVIOUS ACTION TAKEN:**

None.

**HIGHLIGHTS:**

The Federal Government passed Bill S-211, the *Fighting Against Forced Labour and Child Labour in Canadian Supply Chains Act* (the “Act”) effective January 1, 2024. The purpose of the Act is “to implement Canada’s international commitment to contribute to the fight against forced labour and child labour through the imposition of reporting obligations on:

- a) Government Institutions producing, purchasing, or distributing goods in Canada or elsewhere; and
- b) Entities producing goods in Canada or elsewhere or in importing goods produced outside Canada.”

The University of Toronto meets the definition of an Entity in the latter category under the Act by virtue of the goods we import to Canada for resale or use in the University’s operations. As a covered Entity under the Act, the University must, on or before May 31 of each year, report to the Minister on the steps we have 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 by the University, or in the production of goods



imported into Canada by the University.

The Act requires that a report be approved by the Entity's governing body on an annual basis and published on our website. At a minimum, the report must contain the following information about the University:

- a) its structure, activities and supply chains;
- b) its policies and due diligence processes in relation to forced labour and child labour;
- c) the parts of its activities 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 University assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.

The University has prepared the attached report for submission on or before May 31, 2026, based on the goods directly imported to Canada and total procurement spend during the 2024-25 financial year. Procurement activities were carried out in a decentralized purchasing environment within the bounds of the University's Procurement Policy, including the Supply Chain Code of Ethics. In summary:

1. The University of Toronto imported approximately \$29.4 million worth of goods to Canada in 2024-25, representing approximately 4.4% of total procurement expenditures.
2. Most purchases of goods and services are sourced from countries in the lower range of the Global Slavery Index vulnerability scale, as [published by Walk Free](#). However, we recognize that there is an inherent risk of forced labour and child labour used in the production of goods in deeper tiers of the supply chain, for which we do not yet have data.
3. During the reporting period, the University focused on strengthening the foundational elements of its approach to addressing forced labour and child labour risks in its supply chains. This included initiating development of a Supplier Code of Conduct and inherent risk screening process, and participating in sector development of training materials. These activities reflect a practical, phased approach to enhancing supply chain transparency and due diligence.
4. The university is not aware of any instances of forced labour or child labour that require remediation. Work to establish a more formal framework to address potential future instances in its supply chains is ongoing.
5. Key priorities for the next reporting period include improving procurement data and commodity classification to support supply chain analysis, advancing the risk-based approach to procurement for higher-value activities, and progressing the implementation of the draft Supplier Code of Conduct. The University is also implementing a supplier onboarding module as part of its procure-to-pay (P2P) modernization initiative, which will enable the collection of supplier representations and support more consistent supplier information gathering. In parallel, the University will continue to support awareness and capacity-building efforts across its decentralized procurement environment. These efforts reflect a phased and practical approach to strengthening supply chain due diligence over time.

## FINANCIAL IMPLICATIONS:

None.



**RECOMMENDATION:**

BE IT RESOLVED

THAT the *Fighting Against Forced Labour and Child Labour in Canadian Supply Chains: University of Toronto Annual Report* dated April 22, 2026 as presented be approved; and

THAT the Chair of the Business Board be authorized to attest to the Minister of Public Safety that, having exercised reasonable diligence, the information in the Report for the 2024-25 fiscal year is true, accurate and complete in all material aspects for the purposes of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

**DOCUMENTATION PROVIDED:**

Fighting Against Forced Labour and Child Labour in Canadian Supply Chains: University of Toronto Annual Report dated April 22, 2026

# Fighting Against Forced Labour and Child Labour in Canadian Supply Chains

---

University of Toronto Annual Report

April 22, 2026



UNIVERSITY OF  
TORONTO

DEFY  
GRAVITY

Vigilant protection for individual human rights and resolute commitment to the principles of equal opportunity, equity and justice are central to the mission of the University of Toronto. We recognize that forced labour and child labour are significant global human rights issues, and we are committed to assessing and mitigating the risk of these exploitative practices in our supply chains.

Identifying and preventing forced labour and child labour is integral to the university’s dedication to promoting social responsibility throughout the university’s business processes. Current examples of this dedication include our Social Procurement Program and our Trademark Licensing Program.

As a national and global leader in post-secondary education, we also recognize our responsibility to advance public understanding of the risk of forced labour and child labour, including the need to educate members of the university community regarding the risk of these exploitative practices.

**In accordance with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2024, the University of Toronto is required to prepare a report for each financial year setting out the steps taken 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 university or of goods imported into Canada by the university. The University of Toronto’s report for the financial year ended April 30, 2025, is provided herein.**

## Entity Information

<b>Reporting entity’s legal name</b>	<b>The Governing Council of the University of Toronto</b>
<b>Financial reporting year</b>	<b>May 1, 2024 – April 30, 2025</b>
<b>Identification of a revised report</b>	<b>N/A</b>
<b>Business number(s), if applicable</b>	<b>108162330</b>
<b>Identification of a joint report, if applicable</b>	<b>N/A</b>
<b>Reporting obligations in other jurisdictions</b>	<b>N/A</b>
<b>Entity categorization according to the Act</b>	<b>Entity (University)</b>
<b>Sector/Industry</b>	<b>Educational, Public Sector</b>
<b>Location</b>	<b>Toronto, Ontario, Canada</b>

# Structure

Founded in 1827 as King's College and existing, as of 1947, under the University of Toronto Act (revised in 1971), the University of Toronto is Canada's leading institution of learning, discovery, and knowledge creation. We are one of the world's top research-intensive universities and have a long history of transforming society through the ingenuity and resolve of our faculty, students, alumni, and supporters.

Our impact in Canada and around the world is significant:

- More than 700,000 alumni in 199 countries and territories
- 102,431 total enrolment (Fall 2024-25)
- 26,165 employees (Fall 2024)
- \$3.62B annual operating budget for 2025-26
- \$1.54B in research funds awarded to U of T and partner hospitals from national and international sources in 2023-24
- Named the 2<sup>nd</sup> most sustainable university in the world, and 1<sup>st</sup> in Canada by the QS World University Rankings: Sustainability 2026
- Ranked first in Canada and 21<sup>st</sup> globally in the Times Higher Education World Reputation Rankings 2026

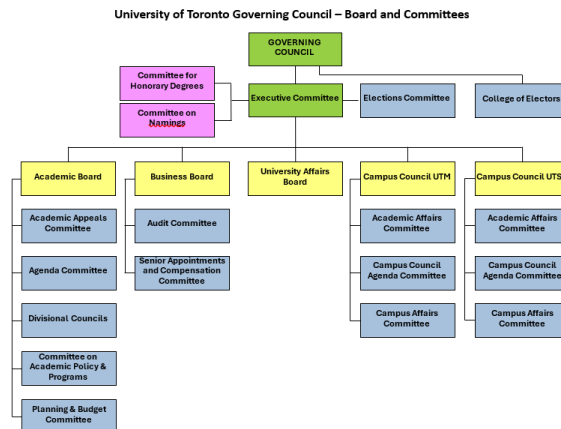
## Governance

[The Governing Council](#), established by the University of Toronto Act, 1971, oversees the academic, business and student affairs of the university. Together with the Chancellor, President and senior administration, the Governing Council represents the university's vision, mission, and purpose both locally and globally.

It is composed of 50 members – 25 members from within the internal university community (including administrative staff, teaching staff and students) and 25 members external to the university (including

alumni and Lieutenant-Governor-in-Council appointees).

The governance structure of the University of Toronto comprises the Governing Council and its Boards, Campus Councils and Committees.



The [Business Board](#) is one of the three Boards of the Governing Council. Its responsibilities include ensuring that resource allocations are responsible and cost-effective, and approving policy and major transactions in the business management of the university. The Business Board approves the U of T Procurement Policy and related supply chain activities.

## Procurement Environment

[Procurement Services](#) provides institutional leadership and policy oversight. Procurement activities are conducted through a combination of:

- central procurement processes and systems managed by Procurement Services,
- Contracting Authorities and specialized buying centres responsible for specific categories such as construction, utilities, library collections, and campus retail operations, and
- decentralized procurement activities undertaken by faculties and administrative units below open competitive procurement thresholds.

# Supply Chain Activities

To support the university’s mission of fostering an academic community in which the learning and scholarship of every member may flourish, we collectively procure a wide range of goods and services in accordance with public procurement law and our ethical sourcing principles.

**Total Annual Procurement Spend:** \$665.5M

**Approximate Number of Active Suppliers:** 9,700

**Number of procurement professionals (excluding local purchasing staff) across the institution:** 29

## Countries and Sourcing

The university sources goods and services primarily from suppliers located in Canada and other jurisdictions with established labour protections. However, many products procured by the university are manufactured through global supply chains.

These supply chains may include production activities occurring in multiple jurisdictions across North America, Europe, and Asia.

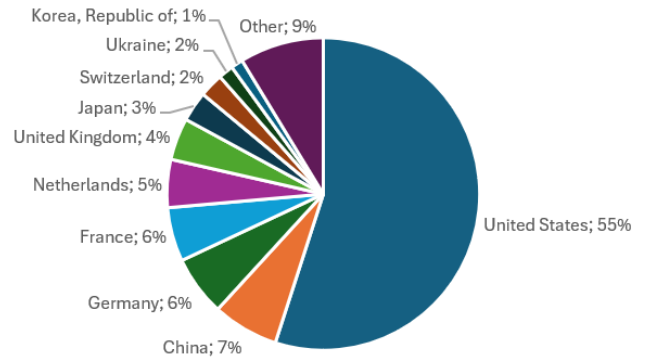
Table 1 FY 2024-25 Procurement Spend by Country

Vendor Country	Total Spend
Canada	\$631.1M
United States	\$30.6M
Great Britain	\$1.7M
Germany	\$0.7M
Italy	\$0.5M
France	\$0.4M
South Korea	\$0.1M
Spain	\$0.1M
Singapore	\$0.1M
Other	\$0.3M
<b>Total Procurement Spend</b>	<b>\$665.6M</b>

## Imports Analysis

During the reporting period, the University of Toronto directly imported approximately \$29.4 M worth of goods into Canada. These imports represented approximately 4.4% of the university’s total annual procurement spend. Not all goods are imported directly by the University; in some cases, the supplier acts as the importer of record.

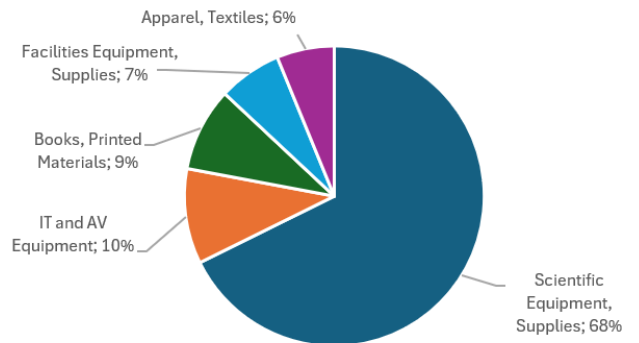
FY 2024-25 Imports by Country



Direct Imports are concentrated in a limited number of procurement categories, particularly:

- scientific equipment and laboratory supplies
- information technology and audiovisual equipment
- books and printed materials
- apparel and textiles.

FY 2024-25 Imports by Category



### Supply Chain Understanding and Visibility

The university recognizes there is a risk of forced labour and child labour across our supply chains, and that this risk may be more likely in certain supply chains based on their geographical location and/or source locations for materials and products the university procures. The majority of sourcing activities are with countries where the risk of forced labour and child labour is low, but we understand that there can be a lack of visibility in certain markets, particularly in secondary and deeper supply chain tiers, and in source materials.

Improving supply chain transparency and developing stronger mechanisms for identifying higher-risk suppliers remain areas of ongoing focus for the university.

## Policies and Due Diligence

---

The university's [Procurement Policy](#) is reviewed periodically to ensure compliance with federal and provincial legislation and related regulations, as well as domestic and international trade agreements. The Policy is principles-based and includes a Code of Ethics that applies to all individuals involved in procurement activities.

The following programs and policies highlight the university's commitment to ethical procurement practices:

### Social Procurement Program

To strengthen our supply chain, mitigate disruption and contribute to fostering a more equitable and prosperous economy, the university introduced the [Social Procurement Program](#). Officially launched in October 2023, the program provides the U of T buying community with a connection to approximately 4,000 Canadian suppliers who rely on local materials

and local employers. Typically, these suppliers have a socially responsible mission and contribute to community wealth-building. By encouraging local buying, the university is improving supply chain visibility and reducing the risk of forced labour and child labour.

### Trademark Licensing Policy

The University of Toronto takes pride in our campuses, students, faculty and brand. The [Trademark Licensing Office](#) ensures the production of university merchandise is aligned with our values. In 2000, we became the first Canadian university to pass a policy ensuring that all merchandise bearing the university's marks are produced under humane and non-exploitative conditions. All branded merchandise must be ordered through a licensed vendor, ensuring that those who create our merchandise uphold the university's commitment to ethical sourcing.

Moreover, the university's [Trademark Licensing Policy and Supplier Code of Conduct for Licensees](#) includes an explicit standard on Child Labour: "No person shall be employed at an age younger than 15 (or 14 where, consistent with International Labour Organization (ILO) practices for developing countries, the law of the country of manufacture allows such exception). Where the age for completing compulsory education is higher than the standard for the minimum age of employment stated above, the higher age for completing compulsory education shall apply to this section." Licensees agree to work with governmental, human rights and non-governmental organizations, as determined by the university and licensees, to minimize the negative impact on any child released from employment as a result of the enforcement of this Code. The Code of Conduct also includes this standard on Forced Labour: "There shall not be any use of forced labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise."

## Procurement Operations

The University's Purchase Order (PO) Terms and Conditions supports compliance with the Act. These require that Suppliers represent and warrant that they do not and will not use forced or child labour as defined in the Act, and that they will take reasonable steps to reduce such risks in their supply chain.

During the reporting period, the University advanced planning for the introduction of a Supplier Code of Conduct to strengthen expectations related to responsible sourcing and labour practices within its supply chains.

This work includes the foundational development of a principles-based Supplier Code of Conduct intended to articulate clear expectations for suppliers and support consistent application of labour-related standards in procurement activities.

Implementation of the Supplier Code of Conduct is expected to occur in phases over the next 24–36 months, beginning with internal consultation and enablement, followed by targeted engagement with suppliers.

The University views this work as an important step in strengthening its approach to supplier engagement and supply chain transparency and will continue to build on this foundation in future reporting periods.

# Assessing Forced Labour and Child Labour Risks in Our Supply Chains

---

The University of Toronto recognizes that risks related to forced labour and child labour may exist within global supply chains and that these risks are

often more prevalent in certain sectors, geographic regions, and tiers of production.

The university draws on a range of sources to identify and assess potential risks related to forced labour and child labour in its supply chains. These include:

- publicly available research and tools, such as the Bureau of International Labor Affairs (ILAB) listings of goods produced with forced labour or child labour
- sector-specific insights and guidance from higher education and public sector procurement networks
- internal procurement data, including information on procurement categories, sourcing patterns and supplier locations.

Building on these inputs, the university is developing a risk-based approach to support the identification of procurement activities that may present a higher likelihood of exposure to forced labour or child labour risks.

The approach is intended to support more consistent identification of higher-risk categories and inform decision-making in procurement processes.

This work includes the design of an inherent risk screening process intended to support proportionate application of labour-related expectations in procurement activities. While working towards the implementation of the Supplier Code of Conduct, the University will deploy its new risk-based assessment framework in higher-risk cases to support informed decision-making and proportionate due diligence.

## Remediation

---

The U of T is not aware of instances of forced labour or child labour that require remediation. Work to establish a more formal framework to address potential future instances in its supply chains is ongoing.

# Training and Capacity Building

---

The University of Toronto remains committed to enhancing awareness and understanding of the requirements under the Act. As part of this commitment, the University continues to collaborate with the [Ontario University Professional Procurement Management Association \(OUPPMA\)](#) to advance a shared training framework aimed at addressing forced and child labour risks within university supply chains.

The objective of this framework is to equip university staff and procurement professionals with the knowledge and tools necessary to recognize and mitigate forced and child labour risks, support compliance with the Act, and reinforce ethical procurement practices. The training emphasizes informed decision making, proactive stakeholder engagement, and clear supplier accountability.

In the previous reporting period, OUPPMA committed to a three-part training program that will deliver structured learning for procurement professionals on key forced and child labour considerations. The first module, which focused on “Awareness of Forced and Child Labour in Supply Chains”, was delivered in March 2025. The University conducted this training with the procurement professionals at each Contracting Authority.

During the past reporting year, OUPPMA developed a dynamic, online companion course as an alternative format to delivering this awareness training and broadened the target audience to include university staff and community members. This course is being released in phases which align with institutional training protocols and scheduling.

In the coming year, OUPPMA will continue developing advanced training and best practice resources for procurement professionals to support effective supplier engagement. This work, which has already begun, will emphasize proactive communication of expectations, risk identification and

assessment, and how to treat high-risk purchases through public procurement practices.

Additionally, the Ontario university sector continues its strategic collaboration with CASPAR – a Canada-wide working group of procurement professionals dedicated to sustainable procurement – to share best practices and collectively strengthen efforts related to compliance with the Act across Canadian universities. During this reporting period, CASPAR has adapted its approach and re-aligned objectives and best practices to support sector-wide awareness, including the continued development of shared resources, such as an awareness video on human rights risks, modern slavery, responsible supply chain management and responsible purchasing.

## Monitoring Effectiveness

---

As implementation of the Supplier Code of Conduct and inherent risk screening process is at an early stage, the University’s current focus is on establishing governance, processes, and internal capability. Measures of effectiveness will be refined as the framework is applied in practice.

## Looking Ahead

---

The University will continue to build on the foundational work undertaken during the reporting period to strengthen its approach to identifying and addressing risks related to forced labour and child labour in its supply chains.

In the next reporting period, the university will focus on advancing a number of priority areas.

---

A key priority is improving the quality and usability of procurement data to support supply chain analysis. This includes continued work to enhance procurement system data and the use of commodity codes to enable more consistent categorization of procurement activity and identification of higher-risk areas.

The university is also implementing a supplier onboarding module as part of its procure-to-pay (P2P) modernization initiative. This capability will support more consistent collection of supplier information, including representations related to responsible sourcing practices, and improve the university's ability to analyze and manage supplier-related risks.

The university will continue to advance the development of a risk-based approach to procurement, with a focus on refining tools and processes that support procurement professionals in identifying and considering potential supply chain risks in higher-value and higher-risk procurements.

In parallel, the university will progress the development of a Supplier Code of Conduct, including internal consultation and preparation for phased implementation. This work is intended to strengthen supplier expectations and support more consistent communication of responsible sourcing requirements.

The university will also continue to support awareness and capacity-building efforts, including participation in sector-based initiatives and the development of tools and guidance for procurement professionals and decentralized purchasers.

These efforts reflect a phased and practical approach to strengthening supply chain due diligence, recognizing the complexity of the university's procurement environment and the need to build capability over time.

## Approval and Attestation

---

In accordance with the requirements of the Act, and in particular, section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material aspects for the purposes of the Act, for the reporting period listed above.

I/we have the authority to bind the University of Toronto.

---

Signature

Name: Jeff Lennon  
Title: Chief Financial Officer (Interim)  
Date: April 11, 2026

---

Signature

Name: Rajiv Mathur  
Title: Chair of the Business Board of the Governing Council of the University of Toronto  
Date: April 22, 2026