



**Office of the Board of Governors**  
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May 28, 2024

The Honourable Dominic LeBlanc, MP  
Minister of Public Safety Canada

Dear Minister LeBlanc:

**Bill S-211 report**

**Mount Royal University (MRU) for the period April 1, 2022 to March 31, 2023**

In accordance with Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff, Mount Royal University is providing the University's report on the steps taken during its previous financial year to prevent and reduce the risk of forced labour or child labour.

The University has completed due diligence to the extent possible and to date, has not identified instances of the use of child labour or forced labour within its operations or those of its suppliers.

This report covers the financial year from April 1, 2022, to March 31, 2023.

**Structure and Activities**

Mount Royal University provides post-secondary education.

**Policies**

MRU has policies and related procedures to govern procurement activities.

**Supply Chain**

MRU has approximately 15,941 direct suppliers with 80.74% based in Canada, 16.11% based in the United States of America, and 3.15% based in various locations around the world. MRU has internal controls in place when engaging with a new supplier. Suppliers must provide the necessary information to the University. All suppliers are expected to abide by the terms and conditions set out within the Supply of Goods and Services Agreement, that is attached to any distributed purchase orders. However, there is no clause within the agreement/terms and conditions that specifically references forced or child labour. These terms and conditions do not contain specific clauses identifying expectations regarding child labour and/or

forced labour. MRU is considering amending the terms and conditions to better align with the Act. MRU has initiated the distribution of supplier questionnaires, addressing concerns regarding the mitigation of forced or child labour within supplier activities. These questionnaires seek further details and supporting documentation from suppliers, serving as a due diligence measure to verify the accuracy of their responses.

A risk assessment of MRU's industry of operation, goods procured and countries where goods are procured from has been performed over material direct suppliers. Material direct suppliers for the purpose of this reporting are those suppliers that make up the top 80% of procurement spend. This risk assessment used two separate indices to conclude on the inherent risk of child and/or forced labour related to goods and countries - Walk Free's Global Slavery Index and the US Department of Labour's List of Goods Produced by Child Labour or Forced Labour.

#### Countries Goods are Procured From

For countries of origin, 80.74% and 16.11% of suppliers are based in countries of Canada and the United States, which are low-risk countries per the Global Slavery Index by Walk Free Organization and the US Department of Labour. The remaining percentages are from various locations internationally but were engaged for services and no goods were purchased.

#### Goods Procured

Per the 2022 List of Goods Produced by Child Labour or Forced Labour published by the US Department of Labour's Bureau of International Labour Affairs, electronics, rubber, glass, textiles (nursing uniforms), fashion accessories, footwear (boots, shoes for workers) that MRU procures belong to high and extreme risk categories. However, the majority of these are supplied by suppliers that are Canadian and US-based which are rated low risk.

#### Remediation

MRU has initiated the distribution of questionnaires to suppliers, concentrating on conducting due diligence concerning this Act. From the initial responses received, no instances of child labour or forced labour have been identified. Additionally, MRU requires each supplier to adhere to local laws of Canada, and those binding the Province of Alberta.

#### Training and self assessment

MRU is in the process of developing relevant training materials and self-assessment tool for procurement and supply chain personnel.

#### Conclusion

To date, the University has not identified instances of the use of child labour or forced labour within its operations or those of suppliers to the extent possible as part of due diligence completed to develop this report.

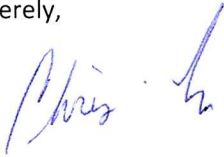
#### Approval and Attestation

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 or entities listed above. Based on my

The Honourable Dominic LeBlanc, MP  
Page 3

knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Lee", with a stylized flourish at the end.

Chris Lee  
Chair, Board of Governors

cc: Chad London, Acting President and Vice-Chancellor, Mount Royal University  
Mustansar Nadeem, Vice-President, Finance and Administration, Mount Royal University