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May 28, 2026

The Honourable Gary Anandasangaree, MP
Minister of Public Safety Canada

Dear Minister Anandasangaree:

Mount Royal University Bill S-211 Report for the period April 1, 2024 to March 31, 2025

This report is Mount Royal University's ("MRU", "University") response to Bill S-211, an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the reporting cycle May 31, 2026. This report covers the financial year from April 1, 2024, to March 31, 2025. It is jointly submitted by Mount Royal University, Mount Royal University Foundation ("MRU Foundation") and Mount Royal Early Learning Centre.

Mount Royal 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.

Structure and Activities

The Board of Governors of Mount Royal University is a corporation that manages and operates Mount Royal University under the Post-secondary Learning Act (Alberta). MRU provides post-secondary education, and it is in Calgary, Alberta.

The University and its consolidated entities are registered charities; The Mount Royal University Foundation is a wholly owned non-profit organization that receives donations and endowments on behalf of the University. The Mount Royal Early Learning Centre is a non-profit organization that provides childcare services primarily for the children of students and employees of the University.

Supply Chain

MRU evaluated the goods and services acquired for the top 97% of its procurement expenditure. These expenditures covered fees and services, construction goods and services, software, employee expense, electronics, books and publishing, aircraft parts, food and beverage, apparel or textiles, fuel, retail products, industrial products, lighting and furniture, equipment, musical instruments, medical and surgical instruments, electric motors, small tools and equipment, alcoholic beverages, and training.

MRU's spending on the above commodity types for the fiscal year ending March 31, 2025 was \$94.74M. The University has a total of 16,557 open suppliers, however for this fiscal period only 1,311 were considered direct suppliers. The table below identifies the University's spend by region:

<u>Country</u>	<u>Direct suppliers</u>	<u>Percentage by region</u>	<u>2024-2025 Spend</u>	<u>Percentage of overall spend</u>
Canada	1,129	86.12%	\$89.38M	94.34%
United States	147	11.21%	\$4.86M	5.13%
Europe	22	1.68%	\$0.37M	0.40%
Asia	10	0.76%	\$0.08M	0.08%
Africa	1	0.08%	\$0.01M	0.01%
Middle East	1	0.08%	\$0.02M	0.02%
Australia	1	0.08%	\$0.02M	0.03%
Totals	1,311	100%	\$94.74M	100%

Supplier Due Diligence

MRU continues to enhance its internal controls for onboarding new suppliers. As part of this process, suppliers are required to complete a Payables & Expense Management Information Form in which they must certify their compliance with Canada's Bill S-211 Act. Suppliers must provide the necessary information to the University, which is reviewed and approved by authorized individuals. 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. MRU has included a clause in its Supply of Goods and Services Agreement that references compliance with Bill S-211.

MRU mandates that all new vendors complete a "Payable and Expense Management Information Form." This form requires suppliers to provide their legal name, address, contact information, banking information, and tax information. If the supplier has provided details regarding their registration with the Canada Revenue Agency (CRA), MRU verifies the accuracy of these details against the form. Any discrepancies are addressed by following up with the supplier to obtain further information. As part of MRU’s internal controls, the supplier is assessed for legitimacy by verifying the business number in the CRA GST Registry, verifying a website presence, supplier documentation (i.e. Corporate Registry Information), Workers Compensation Board (“WCB”), and insurance.

As part of its annual Bill S-211 risk assessment, MRU has continued with the distribution of supplier questionnaires to verify the suppliers’ due diligence process regarding mitigating forced or child labor within supplier activities. These questionnaires request additional details and supporting documentation from suppliers, serving as a due diligence measure to verify the accuracy of their responses. As part of its risk assessment, MRU continued to reach out to their suppliers for fiscal year 2025 by sending supplier questionnaires. This proactive approach demonstrates MRU's commitment to ethical sourcing practices and accountability throughout its supply chain.

Policies

MRU has policies and related procedures to advance the University’s mission, core values, pillars and strategic directions, promote operational efficiency and effectiveness, mitigate or manage institutional risk, comply with the University’s legal, regulatory and other requirements, set behavioral expectations across the University’s community, have broad application and impact throughout the University, and communicate roles and responsibilities. The University’s website has a full listing of policies and procedures, some of these policies include the following:

- **Code of Conduct - Board and Employees** – reflects the commitment to MRU’s values and provides a framework to guide ethical conduct in a way that upholds integrity and reputation.
- **Gender-Based Violence:** The policy documents the University’s commitment to combating Gender-Based Violence and Misconduct within the community.
- **Human Rights Policy:** The policy documents the University’s commitment to creating and maintaining a supportive working and learning environment free from discrimination and harassment as defined under the Alberta Human Rights Act.
- **Responsible Conduct and Research:** The policy documents the responsibilities of the institution researchers pertaining to the ethical and responsible conduct of all research, compliance with the requirements identified in the Tri-Agency Framework: Responsible Conduct of Research (2021), provide a process for fairly and expeditiously addressing allegations of misconduct, the process for addressing conflict of interests in research, and establishing a process for collecting, storing and maintaining integrity of data used in research.
- **Security Services Conduct Policy:** The policy documents MRU’s commitment to comply with the Act and to promote trust and confidence in security representatives and services.
- **Workplace Violence and Harassment Prevention Policy:** The purpose of the policy is to contribute to fostering a safe, healthy, and inclusive workplace that is free of Violence and Harassment. Also, it ensures that MRU meets its obligations and responsibilities as set out in the relevant legislation.
- **Purchasing Policy:** The policy formalizes purchasing practices performed by MRU. Additionally, the policy documents details related to governance over the purchasing and/or leasing of goods and services in aspects of operations, capital, endowment, contract, and research funds (unless specifically excluded).

Risk Assessment

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 97.33% of procurement spend.

Industry of Operations

MRU operates within the education industry which is associated with a low risk of child labour or forced labour according to the - *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, 86.12% and 11.21% of suppliers are based in Canada and the United States, respectively. These countries are low-risk countries per the *Global Slavery Index* by Walk Free Organization and the US Department of Labour. The remaining percentages are from suppliers with various international locations who were engaged mostly for services.

Goods Procured

Per the *2024-2025 List of Goods Produced by Child Labour or Forced Labour* published by the US Department of Labour’s Bureau of International Labour Affairs, electronics, surgical instruments, lumber, rubber and glass used for construction, textiles used for nursing uniforms, footwear such as boots for workers, that MRU procures belong to high and extreme risk categories. However, majority of these are supplied by suppliers that are Canadian and US-based which are rated low risk for forced and child labour.

Remediation

To mitigate the risk of child labour and forced labour within supply chains, MRU incorporates the following mechanisms for supplier due diligence:

Supplier Questionnaires

MRU plans to increase the distribution of supplier questionnaires to 20% of direct suppliers with the main focus on conducting due diligence concerning this Act. During the reporting period, a small sample of supplier questionnaires were distributed to Canadian suppliers. From the initial responses received, no instances of child labour or forced labour have been identified.

Supply of Goods and Services Agreement

MRU expects each supplier to adhere to local laws of Canada, and those binding the Province of Alberta. It requires new suppliers, through the Payables & Expense Management Information Form to confirm their compliance with Canada's Bill S-211 Act. Although MRU's Supply of Goods and Services Agreement currently does not contain specific clauses identifying expectations regarding child labour and/or forced labour, MRU is evaluating the inclusion of provisions related to this issue.

To date, the University has not identified instances of the use of child labour or forced labour within its operations or those of suppliers. The University will review procurement practices to enhance the rigor of its due diligence processes including raising awareness with its suppliers.

Through the use of these mechanisms, MRU is continuing the effort to mitigate the risk of child labour or forced labour through the supply chain. With the questionnaire, the University is actively engaged in collecting survey responses to evaluate this risk across its supply chain.

Awareness Training

MRU is committed to increasing awareness of the requirements under Bill S-211. As part of this effort, we will be collaborating with a third-party firm in developing a training framework on forced and child labour for procurement professionals.

Self-Assessment

During the 2025 reporting fiscal year, MRU conducted a risk assessment analysis on its supply chain operations. It evaluated the risk associated with forced and child labour is low, given the industry of operation and about 97.33% of suppliers are located in the low-risk countries of Canada and the United States. The University has committed to continuously assessing and determining the areas in its supply chain that are at risk of forced or child labour.

Future Initiatives

MRU has and continues to focus its efforts on the following areas to continue to comply with Bill S-211:

- A Supplier Code of Conduct guideline was recently approved and put in effect in early 2026.
- Request suppliers to submit yearly attestation on their compliance with the Bill S-211 requirements and upload documents through the University's vendor portal.
- Develop and document a remediation protocol that outlines specific steps to be taken if instances of forced or child labour are discovered.
- Develop an annual review process that includes gap analysis and continuous improvement.

Conclusion

MRU has implemented measures to address and mitigate forced and child labour. These include updating its Purchasing landing page on their website with a statement about Bill S-211, which aims to increase industry awareness and transparency and encourage businesses to improve practices, and adding a clause in its Payables & Expense Management Information Form requiring suppliers to certify compliance with the Bill. Mount Royal University plans to further refine its internal processes by continuing to update policies and procedures and supply chain management processes to meet the requirements of Bill S-211.

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 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,

Chris Lee
Board Chair and Public Member
The Board of Governors of Mount Royal University

[Original signed by Chris Lee]

Signature

I have the authority to bind The Board of Governors of Mount Royal University