



2024-2025 Toronto Metropolitan University Report: Fighting Against Forced Labour and Child Labour in Supply Chains Act

For the reporting period May 1, 2024 to April 30, 2025

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Part 1 - Annual Report

Introduction

Toronto Metropolitan University (the “University” or “TMU”) is Canada’s leader in high-quality, career-related education fostering innovation and entrepreneurship. With a mission to serve societal needs and a long-standing commitment to engaging its community, the University offers more than 125 undergraduate and graduate programs serving more than 46,000 students, including 2,900 master’s and PhD students, over 4,000 faculty and staff and nearly 200,000 alumni worldwide.

This report, which was prepared by Financial Services (Purchasing Services), outlines the University’s existing processes, measures and progress made in the 2024 fiscal year to prevent and mitigate the risks of modern slavery across our supply chain.

University’s Structure and Activities

The University was originally established on September 16, 1948, by an Order-in-Council. Since its inception, the University has undergone several name changes, most recently in 2022 when the institution’s name was updated to Toronto Metropolitan University, reflecting its unique history and urban location.

The University’s bicameral governance structure consists of two governing bodies with separate and distinct roles—the Board of Governors and Senate—and was established by the Ontario government through the *Toronto Metropolitan University Act, 1977* (amended) (the “TMU Act”). The members of the Board of Governors and Senate come from diverse backgrounds. Whether elected or appointed, the members of the Board of Governors and Senate are not advocates for any one constituency. All decisions of either body are made in the best interests of the University.

Composed of 24 elected and appointed members from inside and outside the University, the Board of Governors is responsible for the governance of the University; control of its property and revenues; and the conduct of its business and affairs, including institutional strategic planning, risk management and financial management of the University.

Comprised of 24 ex-officio members, 52 elected representatives of the University’s faculty, students and alumni, and seven non-voting senate associates, the University’s Senate holds academic authority and is responsible for maintaining, communicating and implementing institutional policies pertaining to: the content and quality of all programs and courses of study; the standards for admission to the university; and the qualifications for obtaining degrees, diplomas and certificates.

In accordance with the provisions of the TMU Act, the University's titular head is the Chancellor who confers all degrees, honorary degrees, diplomas and certificates. The President and Vice-Chancellor is the University's chief executive officer and is responsible to the Board of Governors and Senate for the implementation, supervision and direction of educational policy, general administration and property of the University, including the overall direction of strategic planning, finances and external affairs.

The President is supported by an executive team that oversees the University's academic and non-academic operations. Each executive team member advises on policy and administrative matters relating to their area of responsibility.

The University operates in the higher education sector and aims to lead in career-related education and research in Canada. The University seeks to do this in ways that benefit society on a national and a global scale. The University's current [Strategic Vision plan](#) runs from 2020 to 2030 and sets out the key operational plans of the University.

Supply Chains

The University typically occupies a position at the apex of the supply chain, distanced by several intermediary tiers from the initial stages of raw materials extraction and production. This position presents a considerable challenge when attempting to comprehensively map the entirety of the University's supply chain. As such, the University relies on a network of suppliers and vendors across various industries to procure the diverse array of goods and services necessary for its operations.

The University's supply chain encompasses a diverse array of suppliers crucial for supporting its research and teaching endeavours and operational needs, including buildings and grounds maintenance and construction and refurbishment. The supply chain includes local suppliers, self-employed service providers, construction firms, travel and accommodation providers, security firms, and suppliers of IT equipment and consumables.

Notably, a significant majority of the suppliers comprising the University's supply chain are Canadian-based. During the calendar year 2024, 96% of the University's purchases were issued to Canadian suppliers. The total amount of imported goods in 2024 accounts for 0.4% of the University's total vendor spend. This emphasis on domestic sourcing aligns with the University's commitment to supporting local businesses and fostering economic growth within Canada. However, it also underscores the importance of ensuring ethical practices throughout the University's supply chain, particularly in the context of modern slavery and human trafficking.

University Policies and Due Diligence Processes

At TMU, procurement operates within a structure shaped by various laws, directives and treaties established by both provincial and federal governments. These include: the *Broader Public Sector Accountability Act* and Broader Public Sector Procurement Directive, which sets

standards for transparency and accountability in public sector procurement; the *Building Ontario Businesses Initiative Act, 2022*, aimed at fostering local economic growth and development; and the Canadian Free Trade Agreement (CFTA), Canada-European Union Comprehensive Economic and Trade Agreement (CETA) and the Ontario-Quebec Trade and Economic Agreement (OQTCA), all of which govern procurement practices and ensure fair competition across borders while promoting economic cooperation.

Within the bounds of these regulatory and governmental parameters, TMU has established a robust procurement framework. This framework encompasses a series of procedures and policies managed by various departments to oversee supply chain management and procurement activities. While these policies do not necessarily directly refer to modern slavery, these measures aim to uphold ethical standards and address common vulnerabilities and power imbalances that are relevant to combating it.

The University is committed to only engaging in business with suppliers that can demonstrate they operate responsibly. Currently, our standard terms and conditions that form part of every purchase order or agreement require suppliers to abide by all applicable laws, which include those addressing forced labour and child labour laws.

In February 2025, Purchasing Services in collaboration with Human Rights Services, Sustainability Office, Enterprise Risk (General Counsel's Office), and the Campus Store, implemented a consolidated [Supplier Code of Conduct](#) which incorporates principles from a previously developed code of conduct applicable to TMU's Campus Store but has been expanded to address all goods and services procured by the University. The Purchasing Services web content was revised to add language pertaining to sourcing from ethical and responsible suppliers as a step to consider during a supplier selection process. Additionally, the University has updated its standard purchase order terms to include a representation from suppliers confirming their adherence to TMU's Supplier Code of Conduct.

Within Financial Services, several policies govern how purchases are made including: the University's [Social Purchasing Policy](#), [Purchasing Policy](#) and [Purchasing Procedure](#). In addition to this, other University policies affect how staff and faculty may be reimbursed for expenses and clarify what types of expenses are eligible for reimbursement by the University, which ultimately impacts how goods and services are procured at the University. These policies and procedures include the [Travel and Other Business Expenses Policy](#) and [Travel and Other Business Expenses Guidelines](#), as well as the [University Purchasing Card \(P-Card\) Policy](#) and [Purchasing Card \(P-Card\) Procedure](#).

The purchase of goods or services by the University with a value in excess of \$120,000 is undertaken through an open competitive bidding process in accordance with the trade agreements that the University is subject to. Purchasing activities for these goods and services are centralized within the University's purchasing department in Financial Services to ensure they are managed in an open, fair and transparent manner.

Purchasing activity under \$120,000 is decentralized to University departments where leaders manage their own purchasing decisions in compliance with the University's purchasing policies and procedures. Central purchasing services are engaged to provide support and recommendations in addition to reviewing all purchase orders for compliance. These purchases can be made using a number of different tools and processes including purchase orders, University corporate credit cards, cheque requisitions, invoice direct payments and expense reimbursements, all of which are governed by various policies and procedures.

All activity at the University is subject to internal controls and due diligence. The University's [Conflict of Interest Policy](#) sets out the ethical principles that the University requires staff members to comply with in the performance of their roles at the University to promote standards of conduct that support the mission and values of the University. The [Execution of Contracts Policy](#) requires that the University's contracting authorities consider probity issues and undertake an appropriate level of pre-contract due diligence and risk assessment before binding the University to a contract.

Internal Audit Services at TMU provides independent, objective assurance and advisory services designed to improve and add value to university operations. Internal Audit Services reports administratively to the University's Vice-President, Administration and Operations and functionally to both the University's President and Vice-Chancellor and the TMU Board of Governors Audit and Risk Committee.

The University provides mechanisms for safe disclosure for individuals who may identify or suspect acts of fraud, theft or other misappropriation of University resources. Reports can be submitted using a confidential and safe online tool. These disclosures are managed by the University's [Safe Disclosure Policy](#) and [Safe Disclosure Procedure](#).

Risks of Forced Labour in University Supply Chain

TMU recognizes that its greatest risk of exposure to forced labour and child labour lies within its supply chain, particularly in the procurement of goods from high-risk suppliers and regions. To address these concerns, TMU is committed to ongoing education and training for all individuals involved in purchasing decisions, ensuring they can assess and mitigate risks associated with the extended supply chain.

In compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") and to uphold ethical procurement practices, TMU has implemented a continuous spend analysis process to identify and reduce the risks of forced and child labour. This process enables the university to:

- Identify high-risk suppliers, regions, and commodities
- Monitor changes in procurement patterns
- Ensure transparency and accountability in the supply chain
- Take proactive measures to mitigate risks

Through these efforts, TMU reaffirms its commitment to responsible sourcing and the protection of human rights within its supply chain.

Steps Taken to Assess and Manage Risk in Supply Chain

In alignment with the Act and TMU's commitment to ethical procurement, an internal risk assessment, developed by Purchasing Services, has been conducted to evaluate the potential presence of forced labour and child labour in the University's Tier 1, which are supplier's who have a direct contract with TMU, supply chain.

As part of this assessment, TMU has completed a procurement and spend analysis covering October 2021 – September 2024, focused on:

- Identifying procurement from high-risk countries
- Assessing exposure to high-risk commodities
- Determining necessary supplier engagement and corrective actions

Key Findings

- Nominal Spend in High-Risk Regions: TMU's analysis identified that only 0.2% of total procurement spend originated from high-risk countries as classified by global forced labour indices (e.g., U.S. Department of Labor's List of Goods Produced by Child or Forced Labour, International Labour Organization reports).
- Limited Exposure to High-Risk Commodities: Of the 0.2% spent in high-risk countries, only 1.5% was linked to commodities known to have a higher risk of forced or child labour

Vendor Engagement

TMU is in the process of communicating with identified vendors to:

- Gather more detailed supply chain transparency information
- Verify compliance with labour and human rights standards
- Request supporting documentation, such as certifications and audit reports

Future Actions

To strengthen TMU's due diligence efforts, the following actions will be taken:

- Annual Spend Analysis: This internal assessment will be conducted every year to ensure ongoing monitoring of potential risks.
- Supplier Engagement: High-risk vendors will be required to provide additional labour compliance assurances and may undergo further scrutiny or audits.
- Training & Awareness: TMU procurement staff will receive ongoing training on identifying and mitigating labour exploitation risks in supply chains.

Measures Taken to Remediate Forced or Child Labour in Supply Chain

At this time, the University is not aware of any victims resulting from any University purchases made from suppliers known to have utilized child labour or forced labour.

TMU is committed to ensuring that all goods and services procured by the University align with ethical labour practices, including the elimination of forced labour and child labour in our supply chain.

As part of our compliance efforts, TMU has provided training to its Procurement Services team and implemented a Supplier Code of Conduct to:

- Prevent, detect, and remediate instances of forced or child labour
- Hold suppliers accountable for ethical sourcing and fair labour practices
- Increase transparency within our procurement and supply chain operations

Measures Taken to Remediate the Loss of Income Resulting From Forced and Child Labour in University Activities

At this point, the University is not aware of any victims resulting from any University purchases made from suppliers known to have utilized child labour or forced labour.

Training Provided to Employees on Forced or Child Labour

Purchasing Services at TMU is committed to increasing awareness of our obligations under the Act. As part of this effort, TMU as a member of the Ontario University Professional Procurement Management Association (OUPPMA) is developing a common training framework on forced and child labour for procurement professionals. The framework aims to help university procurement professionals recognize and mitigate human rights risks in supply chains, ensure compliance with the Act, and support ethical procurement practices through informed decision-making, stakeholder engagement, and supplier accountability.

To provide structured training, a modular framework is being developed, offering targeted guidance on key aspects of human rights in procurement:

1. *Module 1: Awareness of Human Rights in Supply Chains*

Covers procurement's role in ethical sourcing, key compliance requirements under the Act, and identifying red flags in high-risk industries.

2. *Module 2: Interacting with Internal Clients on Human Rights*

Focuses on legal, financial, and reputational risks, high-risk procurement areas, and balancing cost considerations with ethical decision-making.

3. *Module 3: Interacting with Suppliers on Human Rights*

Provides strategies for setting expectations, addressing violations, conducting due diligence, and enforcing a Supplier Code of Conduct.

In parallel, the Ontario university sector is working with CASPAR (CAUBO/ACPAU Sustainable Procurement Approvisionnement Responsable), a national association focused on Sustainable Procurement, to develop an awareness video for the broader campus communities of decentralized purchasers. This video will cover human rights risks, modern slavery, and ethical supply chain management.

These training initiatives are expected to launch in 2025, with rollout plans to follow.

Assesses Effectiveness in Ensuring that Forced and Child Labour are Not Being Used

TMU recognizes the significance of measuring and evaluating its actions to enhance processes, measurement tools and outcome-driven performance indicators. This is aimed at consistently reducing the risk of modern slavery practices within the University's operations and supply chain.

While TMU's direct exposure to high-risk regions and commodities remains low (0.2% of total spend, with only 1.5% in high-risk goods), the University remains committed to continuous improvement in supply chain ethics. TMU will monitor suppliers and spend, and enhance procurement procedures.

Approval and Attestation

I, Anthony Staffieri, Chair of the Board of Governors of Toronto Metropolitan University (the “University”), hereby certify for and on behalf of the University, and not in my personal capacity, that the attached report entitled “2024-2025 Toronto Metropolitan University Report: Fighting Against Forced Labour and Child Labour in Supply Chains Act” is true, accurate and complete for the purposes of the Act, and has been approved by the Board of Governors by resolution on or before April 30, 2025, in accordance with paragraph 4(a) of the “Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff”.



Anthony Staffieri
Chair, Board of Governors of Toronto Metropolitan University