



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

Annual Report for Fiscal Year End March 31, 2026

**Saint Mary's University's 2026 Annual Report on Fighting Against Forced Labour and
Child Labour in Supply Chains**

Reporting entity's legal name: Saint Mary's University

Financial reporting year: April 1, 2025 – March 31, 2026

Identification of a revised report: N/A

Business number(s): 119189900

Identification of reporting obligations in other jurisdictions: N/A

Entity categorization according to the Act: Entity (University)

Sector/industry: Public Sector / Higher Education

Location: Halifax, Nova Scotia Canada

Introduction / About Saint Mary's University

Saint Mary's University (the 'University') is the second-largest university in Nova Scotia, in one of Canada's fastest growing cities, Halifax. Our programs in Arts, Science, Graduate Studies, and Business are taught by professors who are committed to the success of our 5,500 students. We offer undergraduate degrees, Masters, and PhD programs in the natural sciences, humanities, business, and social sciences. With over 60,000 alumni worldwide, we are also known for our global and intercultural connections. Seventy-four percent of the student population is Canadian (predominantly from Atlantic Canada) and the remainder are from 117 countries around the globe.

Above all, Saint Mary's University is a warm, caring community with opportunities for student engagement in leading-edge research and other activities often associated only with comprehensive universities. This unique combination helps us stand out. In 2021, Saint Mary's University launched a refreshed brand and delivered a reputation campaign in Nova Scotia and major centres in Atlantic Canada, targeting people 18+. *World Without Limits* is a distillation of Saint Mary's University — right now. The opportunities (limitless) and places. At the same time, it is aspirational as we recognize that many individuals and communities face significant 'limits' and that there is much work to be done to achieve our goal of a World Without Limits.

Our campus is based in Mi'kma'ki, the ancestral and unceded territory of the Mi'kmaq, and is global in reach and influence. The University campus covers all property within the boundaries of Robie Street, Inglis Street, Tower Road, Gorsebrook Avenue, and the Oaks property, as shown on the Campus Map <https://smu.ca/documents/campus-map.pdf>

Part of the University's mission / mandate of is to offer undergraduate, graduate and life-long learning programs, engage in research and disseminate its results, and to serve the community from the local to the international level. Our values articulate our distinctive contribution to civil society, locally and globally, and include pursuing academic growth, demonstrating resilience, developing intercultural competence, engaging our alumni and community, as well as exercising ethical wisdom.

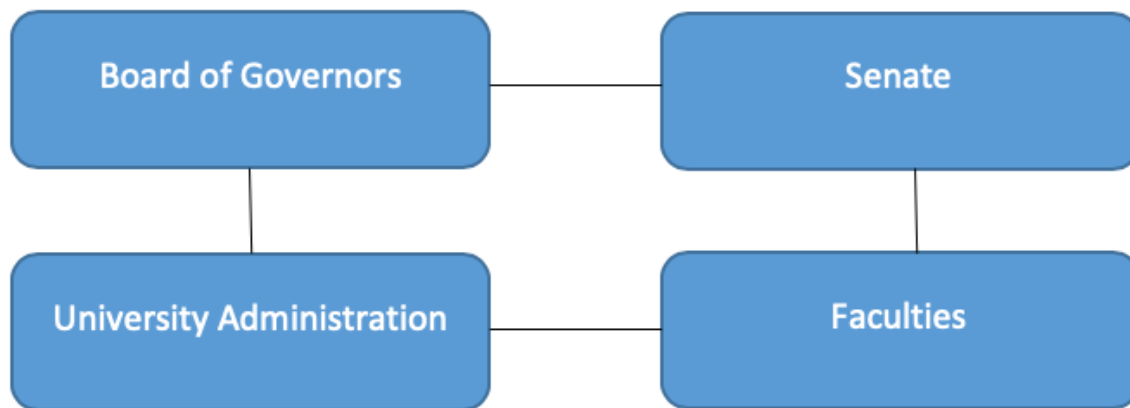
The University is committed to accessibility, diversity, and the provision of a positive and supportive learning environment through the effective integration of teaching and research. We recognize the importance of the contribution and growth of each individual in the University's success. Through promoting the importance of critical enquiry, leadership, teamwork and global awareness, we aim to prepare students for responsible and rewarding lives and to remain engaged with our alumni worldwide, as outlined in [Saint Mary's University Strategic Plan](#).

In this 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*. More specifically, we outline the steps the University has taken during the previous financial year to prevent and reduce the risk of forced labour and child labour being used at any step of the supply chain.

Reporting Entity and Structure

Saint Mary's University is incorporated under a special act of the Nova Scotia legislature, the Saint Mary's University Act, 1970. The 1970 legislation continues an organization that traces back to 1802.

Like most Canadian universities, Saint Mary's University operates under a shared governance structure. The Board of Governors has the overall conduct, management, and control of the University, and in particular oversees all administration of the University, including property, revenues, expenditures, and business. The Senate oversees the academic and research activities of the University, subject to the powers of the Board of Governors.



Through its stewardship role, the Board oversees the conduct of the University's affairs, ensuring through the President that a qualified and diligent team carries out the day-to-day activities with respect to the University's financial and other resources, and together with the Senate, fulfills the mission of the University.

For greater clarity, the Board does not duplicate the role of the University's administration, which is responsible for the day-to-day business of the University and for the implementation of policies adopted by the Board. The governance structure is established in the Saint Mary's University Act, 1970. More info on the entity structure can be found at the following link: <https://www.smu.ca/about/governance.html>

Activities and Supply Chain

The University procures materials from established suppliers and vendors to support the provision of educational and support services. Goods are primarily sourced from suppliers within Canada, and where applicable, through Interuniversity Services Inc. (ISI), Kinetic GPO, as well as Canoe GPO. ISI is a not-for-profit organization representing a membership of 19 universities and colleges throughout Atlantic Canada and manages vendor relationships on their behalf. The Kinetic & Canoe GPOs are both group purchasing organizations established for public sector and MASH entities across Canada, with the specific purpose of reducing procurement costs by leveraging the purchasing power of group buying.

Business activities related to the importation of goods

Saint Mary's University purchases and in some cases, imports goods to support the administration of academic and student services, research and development, marketing and communications, as well as facilities management. Related supply chain activities include:

- Acquisition of goods and services needed for university operations (information technology, office supplies, lab equipment and supplies, facilities management)
- Bookstore – sale of goods in Canada, a small proportion of which are imported (textbooks, apparel, electronics, office supplies and promotional products)
- 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)
- 3 residences providing accommodation to students
- On-campus food services

Policies and Due Diligence Processes

The University has policies and responsible business conduct due diligence practices which govern our activities and aim to reduce the risk of modern slavery in our operations and supply chain. These include:

- Purchase Order Terms and Conditions
- Purchasing Threshold Policy
- Sustainable Procurement Policy
- Code of Conduct for Vendors of Crested Apparel and Crested Giftware Policy
- Supplier Code of Conduct (*in-progress*)
- University Code of Conduct

Purchase Order Terms and Conditions

The University strives to work with partners who are aligned with our values and commitments. All suppliers are expected to adhere to the University's standard purchase order terms and conditions. These terms and conditions are contractually binding and require suppliers to comply with all applicable Workers' Compensation and Employment Insurance Laws in the Province of the University, and all other applicable laws, codes, regulations, rules, and orders. This includes compliance with labour laws. The University reserves the right to terminate any agreement with any supplier that cannot demonstrate compliance with the terms and conditions.

Purchasing Threshold Policy

As a public institution, Saint Mary's University has a responsibility to act and be seen to act in a fair and open manner. The University's purchasing activities must be conducted in accordance with this responsibility. The Purchasing Threshold Policy is used to ensure that we act appropriately, and University purchasing processes comply with the requirements under the Nova Scotia procurement legislation and trade agreements. This policy applies to all University procurement transactions. The policy details at what value levels competitive quotes are required.

Sustainable Procurement Policy

The University's Sustainable Procurement Policy seeks, in part, to assist the University in establishing a framework that will incorporate social and environmental practices into its procurement activities. Where feasible, Procurement Services employs full-cost accounting principles by including economic, environmental, social, and end of life disposal considerations in the evaluation process. The University will ensure that the supplier community is aware of its position on sustainable procurement by including information in Request for Proposal (RFP) and Tender documents. More information regarding sustainability at Saint Mary's University can be found here: <https://www.smu.ca/sustainability/>

Code of Conduct for Vendors of Crested Apparel and Crested Giftware Policy

Saint Mary's University is committed to ethical workplace standards and an appropriate Code of Conduct. The University expects its suppliers to control their business affairs and relationships in a manner consistent with our Code of Conduct. As a condition of being permitted to supply apparel and giftware bearing the name, trademarks and/or images of Saint Mary's University, each vendor must comply with this Code and provide written assurance to Saint Mary's University that they adhere to this Code.

This Code includes compliance with forced labour and child labour laws, among other things. If the University determines that any vendor has failed to remedy a violation of this Code, the University will consult with the vendor to examine the issues and determine the appropriate measures to be taken. More info on this policy can be found by viewing the *SMU Policy 2-3002 - Code of Conduct for Vendors of Crested Apparel and Crested Giftware*.

Supplier Code of Conduct (in-progress)

Saint Mary's University has continued to research Supplier Codes of Conduct that all suppliers must adhere to. The University's goal is to continue working on this policy, with the intent to have it finalized and published by March 31, 2027.

This Supplier Code of Conduct will reinforce and supplement our procurement and purchasing practices, policies, procedures and contracts. This Supplier Code of Conduct will also outline the minimum standards expected from the University's suppliers and their subcontractors or agents who participate in any University procurement process or transact with the University.

The Supplier Code of Conduct would not replace a supplier's obligations as may be set out in a contract between the University and the supplier. It is the responsibility of each supplier to ensure that their own supply chains are compliant with the provisions of this Supplier Code of Conduct.

Fair-Trade Campus Designation

In February of 2023, Saint Mary's University was recognized as a Fair-Trade Campus by Fairtrade Canada, affirming our commitment to ethical sourcing and global fairness. This designation highlights our dedication to supporting fair wages and sustainable practices within our community.

Being designated a Fair-Trade Campus underscores Saint Mary's ongoing efforts to promote social justice and environmental stewardship through our purchasing choices. By prioritizing Fairtrade-certified products, we contribute to empowering farmers and workers worldwide.

University Code of Conduct

In 2024, the University adopted the [University Code of Conduct](#). The Code requires all university members to adhere to provincial and federal legislation and regulations in all respects, among other standards of behaviour reflecting personal integrity, avoiding conflicts of interest, and respecting others.

Parts of Supply Chain that Carry a Risk of Forced Labour or Child Labour and Steps Taken to Assess and Manage that Risk

The University makes efforts to manage the risks associated with imported product in the supply chain. To mitigate the risks of importing, the University will source domestically, where possible.

Clothing and University swag, as well as lab equipment and supplies, have been identified as an area of risk for forced labour and child labour within the University's supply chain. To mitigate risk, in 2004 the University implemented the previously mentioned policy regarding *Code of Conduct for Vendors of Crested Apparel and Crested Giftware*. The policy states that the University's vendors of crested apparel and crested giftware must operate workplaces that adhere to certain minimum standards and practices. The University will only do business with vendors whose workers are present to work voluntarily, are not at undue risk of physical harm and are fairly compensated. The specific guidelines cover the following topics:

- Wages and Benefits
- Working Hours
- Overtime Compensation
- Child Labour
- Forced Labour
- Health and Safety
- Discrimination
- Harassment or Abuse
- Freedom of Association

The University is committed to working with our suppliers to assess and manage these risks. We have recently engaged one of our vendors to review our on-hand inventory, to indicate where we can generate savings, source more Canadian products, and mitigate forced labour and/or child labour risks

Remediation Measures, if Applicable

Based on our knowledge, the University has not identified any instances of forced labour or child labour in our supply chains. Consequently, no remediation measures were required for the fiscal year ended March 31, 2026, in respect of any modern slavery – including forced labour or child labour.

Remediation Measures re: Loss of Income to Vulnerable Families, if Applicable

As noted above, the University has not identified any instances of forced labour or child labour in its supply chains and therefore has not taken any associated measures to remediate the loss of

income to the most vulnerable families that result from measures taken to eliminate the use of forced labour or child labour in their supply chains.

Training Provided to Employees

The University emphasises ethical conduct and understands the role our employees play in shaping our culture and driving success. We remain dedicated to enhancing our employees' understanding and compliance to our policies and procedures.

For the upcoming fiscal year, an assessment will be made to determine the adequacy of training provided across our employee base, and to our procurement staff in relation to Bill S-211.

Assessing Effectiveness of Measures Taken

The University does not currently employ any formal metrics to assess our effectiveness in ensuring that forced labour and child labour are not being used in our other supply chains. We intend to continue monitoring our supply chain for indicators of forced labour and child labour, including performing due diligence on new vendors and on existing vendors to the extent that we learn of material changes in their circumstances. We will also continue to provide training to staff to ensure the risks related to forced labour and child labour are known. We will endeavor to continue examining our policies and processes to address this important risk, as conducting our business with strong ethics and integrity is critical to earning and maintaining the trust of our students, faculty, employees, and community. We will assess the need to implement formal metrics to govern these activities in the next fiscal year.

Approval and Attestation

This report has been signed by the Vice-President, Finance and Administration of Saint Mary's University under the authority as delegated by the Board of Governors of the University.

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.



Susan MacDonald, CPA, CPA (US), CA
Vice-President, Finance and Administration
Saint Mary's University
Date: May 31, 2026

I have the authority to bind Saint Mary's University