

# 2024 Annual Report: Fighting Against Forced Labour and Child Labour in Supply Chains Act

This report (the “Report”) has been prepared in accordance with *sections 9 and 11* of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). The Report outlines our efforts to prevent or reduce the risk of forced and child labour in its supply chains during our fiscal year commencing on July 1, 2023, and concluding on June 30, 2024.

## 1. Our Operational Structure and Supply Chains

Bow Valley College (the “College”) was founded in 1965 and has campuses in Calgary and Okotoks. We are governed by a board named “The Board of Governors of Bow Valley College” in accordance with *section 43* of the *Post-Secondary Learning Act*, Alberta.

We have over 15, 000 full-time and part-time students and employ 1302 employees who provide teaching, administrative and professional services. As a post-secondary institution, our primary supply needs include academic resources, health-related supplies, technology, and office supplies. Our central purchasing team ensures that all procurement activities comply with College policies and applicable procurement laws. While some purchases may occur outside our standard procedures, we strive to source locally whenever possible and encourage employees to purchase from Canadian companies. Our adherence to the Canadian Free Trade Agreement and the New West Partnership Trade Agreement further underscores our commitment to promoting domestic trade.

## 2. Our Policies and Due Diligence Processes on Forced Labour and Child Labour

Our contracts include clauses that require adherence to relevant laws and responsible operation in social, economic, and environmental matters. In addition, we have policies and processes in place that promote socially responsible business practices:

### a. Procurement Processes

We prioritize the procurement of goods and services from reputable Canadian suppliers. Our Campus Services team oversees a sustainable purchasing program with the goal that every purchase we make contributes to a supply chain that promotes positive environmental, social, and economic health. For procurements that exceed \$75,000, we conduct a due diligence process, which includes assessing the supplier’s social, economic, and environmental impacts. Furthermore, our Sustainability Office reviews and evaluates all competitive bids. Each competitive bid includes a sustainability questionnaire tailored to its specific context, with additional sustainability weighting for goods associated with concerns like forced and child labour, for example, textiles. In May 2024, specific questions relating to the Act were incorporated into the sustainability questionnaire for all competitive bids.

### b. Policies and Procedures

Our Purchasing Policy, particularly our Sustainable Procurement Procedure, outlines our approach to ethical procurement and our commitment to ensuring goods are produced ethically and under fair working conditions. We also require all suppliers to review and agree to our Supplier Code of Conduct, which mandates adherence to the International Labour Organization (“ILO”) labour standards, including prohibiting the use of child or forced labour.

### 3. **Assessing and Managing Risks of Forced Labour or Child Labour in Our Business and Supply Chains**

We do not use forced or child labour in our operations. A thorough pre-employment screening is conducted, including verification of age and immigration status for all employees. Additionally, employees are hired with remuneration, benefits, and work conditions that comply with applicable laws and regulations.

No instances of forced or child labour were identified this fiscal year. However, as previously reported, our purchase of electronics, purchases made outside of our standard procurement process and purchases made by our international recruitment agents have been identified as having a risk of forced or child labour in the supply chain. We continue to review and analyze these risks.

### 4. **Actions Implemented to Address Forced Labour, Child Labour, and Loss of Income**

No instances of forced or child labour were found in our activities or supply chains.

### 5. **Employee Training on Forced Labour and Child Labour**

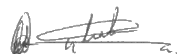
During the 2023-2024 fiscal year, the College was an active member of the Association for the Advancement of Sustainability in Higher Education (“AASHE”) and the Sustainable Purchasing Leadership Council (“SPLC”). Our membership with the SPLC ensures we remain informed of the best practices in sustainable purchasing. All College employees can access SPLC’s resources via their Bow Valley College email addresses. However, no formal training was provided to employees regarding forced and child labour issues during the reporting period.

### 6. **Assessing Our Forced Labour and Child Labour Prevention Measures**

Our procurement policies and processes, as described above, outline our approach to evaluating potential suppliers and service providers based on their adherence to ethical business practices. Although we believe that the measures taken to address forced labour and child labour have been effective, we will continue to review and improve our strategies to prevent and reduce the risk of forced and child labour being used in our supply chains.

### 7. **Approval and Attestation**

This Report was approved by the Board of Governors of Bow Valley College on June 6, 2025, in accordance with *section 11 (4) (a)* of the Act and signed on its behalf by:



Misheck Mwaba, P. Eng., Ph.D.  
President & CEO

Date: June 2 2025