



SUBJECT	Fighting Against Forced Labour and Child Labour in Supply Chains Act Reporting Requirement and Delegation of Signing Authority
SUBMITTED TO	Board of Governors
MEETING DATE	September 25, 2024
SESSION CLASSIFICATION	Recommended session criteria from Board Meetings Policy: OPEN
REQUEST	CONSENT AGENDA ITEM APPROVAL REQUESTED: IT IS HEREBY RESOLVED that the Board of Governors delegates signing authority to the Chair of the Board of Governors pertaining to the submission and signing of the annual Fighting Against Forced Labour and Child Labour in Supply Chains Act report to the Minister of Public Safety for the current and all future fiscal years that UBC is required to report as per the Act.
LEAD EXECUTIVE	Frank Laezza, Vice-President Finance & Operations
SUPPORTED BY	Elana Mignosa, AVP Finance & Integrated Services Shelly Morrison, Senior Director, Finance Services & Strategic Procurement Michael Serebriakov, Legal Counsel

EXECUTIVE SUMMARY

Canada's anti-modern slavery legislation, the [Fighting Against Forced Labour and Child Labour in Supply Chains Act](#), came into effect on January 1, 2024. The University of British Columbia (UBC) is obligated to comply with the Act's reporting requirements and successfully filed its first annual report and questionnaire responses with the Ministry of Public Safety Canada on May 22, 2024. For that first report, the Board authorized at its March 27, 2024 meeting that then Interim Board Chair Bill Sundhu be delegated authority to approve and sign the report so that it could be submitted prior to the March 31, 2024 deadline set by the federal government.

In fiscal year 2024, UBC spent \$1.85 billion with 27,090 suppliers across 94 countries and 0% on goods originating from at-risk countries identified in the global slavery index. The report is publicly accessible on [UBC's finance website](#) and Public Safety Canada's [website](#).

As a reporting entity with obligations as per the Act, an annual reporting cadence is necessary.

This briefing requests approval for the delegation of signing authority of future reports to the Board Chair in perpetuity, provided UBC remains a reporting entity as per the Act.

THE ACT

The Act aims to address the prevalence of forced labour and child labour for goods imported into and distributed in Canada. As outlined on the Public Safety Canada website:

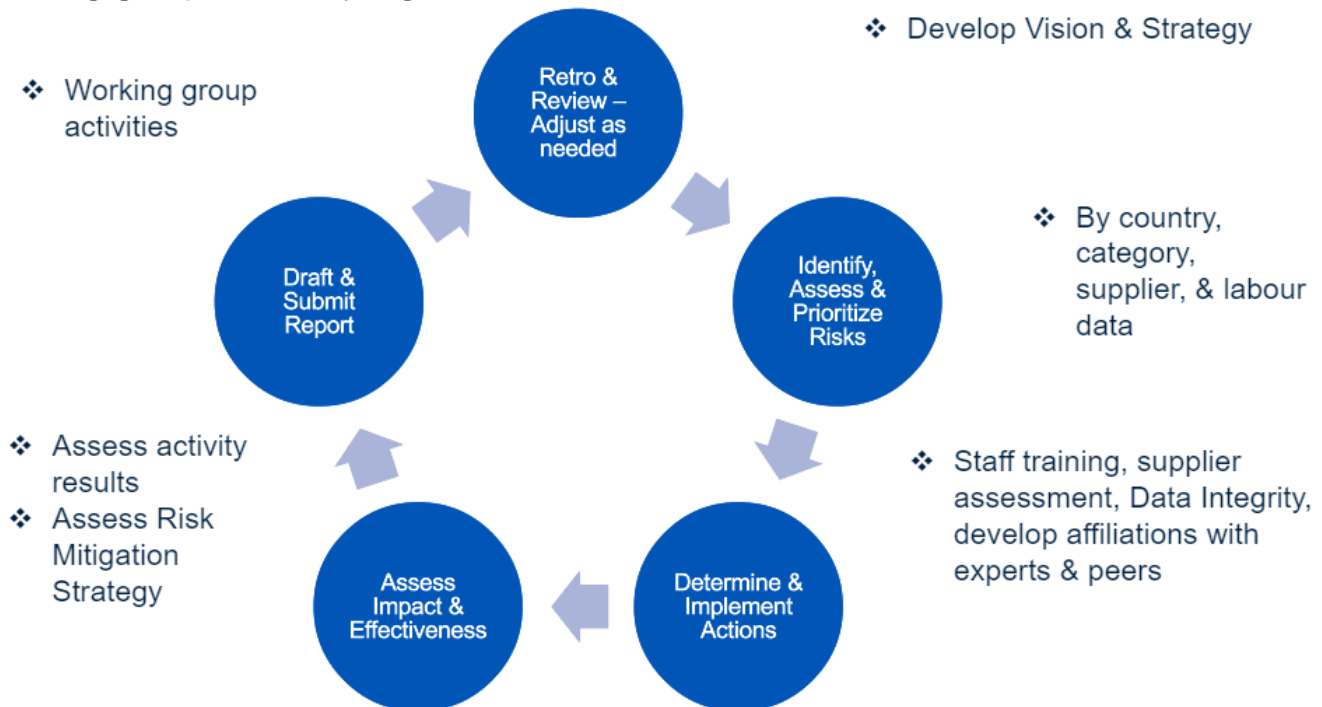
Forced labour can be found in every country and every sector. The [International Labour Organization](#) estimates that there are 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through the global supply chains of businesses. There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions doing business in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

REPORT AND QUESTIONNAIRE

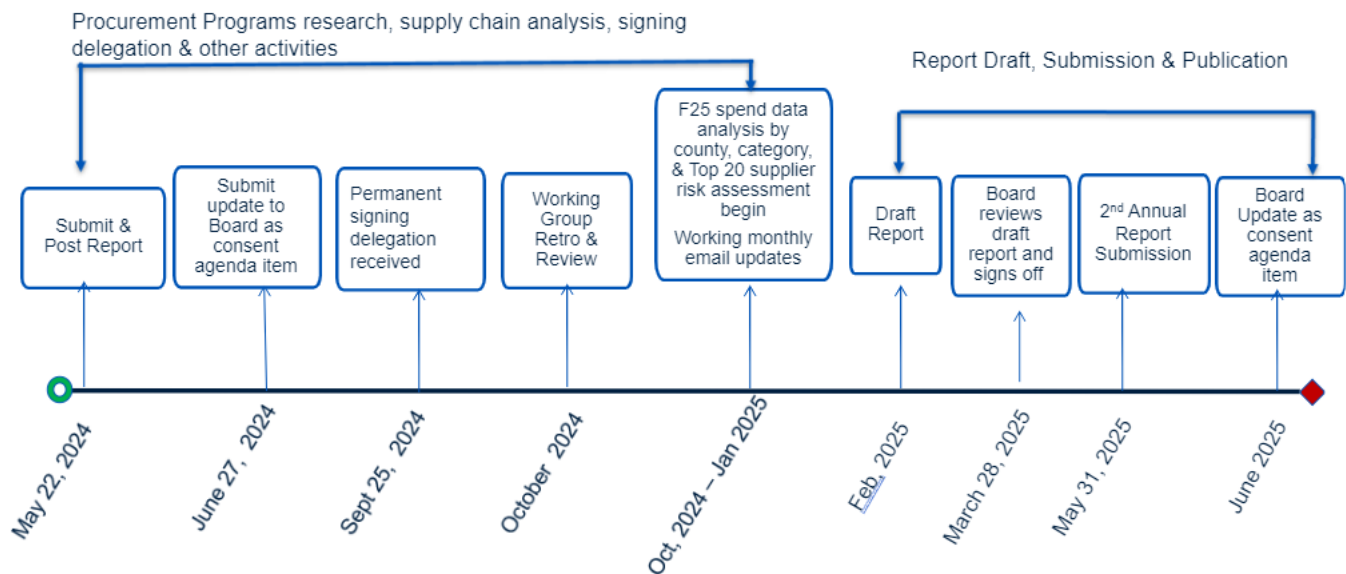
Canada's modern slavery legislation, [Fighting Against Forced Labour and Child Labour in Supply Chains Act](#) requires reporting entities to complete an [online questionnaire](#) that includes a series of open and closed-ended questions that address each of the requirements under the Act and submit a signed and attested report. The questionnaire is a tool to assist entities in demonstrating leadership and responsibility while providing the level of transparency that the UBC Board of Governors, faculty, staff, students, and members of the public are looking for. The questions within are a roadmap for developing a program to support the management of supply chain risk that is in alignment with the intention of the Act and reporting requirements. The working group intends to follow this roadmap in developing activities for F25 and future years to improve its capacity to identify, prevent, reduce and address forced labour and child labour risks.

REPORT PREPARATION AND SUBMISSION CYCLE

Managing risks, actions and reporting



F25 HIGH LEVEL TIMELINE



CURRENT STATE: UBC FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT WORKING GROUP

Preparations are underway for the Working Group to recommence the report preparation cycle for the fiscal year 2025.

Key activities for F25 report preparation are:

- Research third-party supplier analytics providers to explore supplier tiers 1 and 2 beyond current Workday capacities.
- Examine in-house capabilities with data and reporting teams to meet the requirements of the year 2 report and to explore supplier tiers 1 and 2 data management.
- Develop annual report preparation, approval and submission cycle
- Confirm roles and accountabilities within the process
- Develop standardized timeline for creation and approval of future reports, and
- Develop plans and activities to implement identified improvements

BROADER CONTEXT & IMPLICATIONS OF APPROVAL

Canada's modern slavery legislation, Fighting Against Forced Labour and Child Labour in Supply Chains Act, requires annual submission of a report that is approved by its governing body. The annual cadence of report submission to [Public Safety Canada](#) means ongoing approval of the report and questionnaire is necessary. UBC current assessed risk of forced labour and child labour in its supply chains is low. The program of work to ensure the risk stays low is in development, and work to create a standardized sequence of activities to ensure compliant reports are produced and submitted each year.

We ask that approval and signing authority be delegated to the chair of the Board for the current and all future fiscal years that UBC is required to report as per the Act

APPENDICES

Appendix A

UBC Working Group: Fighting Against Forced Labour and Child Labour in Supply Chains Act

Elana Mignosa	AVP, Finance & Integrated Services	VP Finance and Operations
Shelly Morrison	Senior Director, Financial Services & Strategic Procurement	VP Finance and Operations
Ernesto Castano Gutierrez	Associate Director, Procurement	VP Finance and Operations
Carolyn Arthur	Senior Manager, Procurement Programs	VP Finance and Operations
Siret Ulp	Procurement Program Advisor	VP Finance and Operations
Kiersten Lyde-Stad	Procurement Programs Administrator	VP Finance and Operations
Carolyn Rhee-Thompson	Portfolio Finance Director, VPFO/VPHR	VP Finance and Operations
Doug Cheung	Director, Treasury	VP Finance and Operations
Allen Amyotte	Interim Chief Assurance & Risk Officer	VP Finance and Operations
Omer Ahmed	Director, Enterprise Risk Management.	VP Finance and Operations
Helen Shen	Continuous Improvement Program Manager	VP Finance and Operations
Jill Belluomini	Executive Assistant to the Vice-President Finance and Operations	VP Finance and Operations
Yvonne Kwok	Manager, Communications	VP Finance and Operations
Carri Lawrence	Director, Financial Operations, Finance and Operations (UBC Okanagan)	VP Finance and Operations
Rebecca Way	Manager, Procurement, Finance and Operations (UBC Okanagan)	VP Finance and Operations
Michael Serebriakov	Legal Counsel	University Counsel Office
Arig al Shaibah	Associate Vice-President, Equity and Inclusion	Provost and VP Academic
Joely Viveiros	Associate Director, First Nations House of Learning	Provost and VP Academic
Linda Nowlan	Senior Director, UBC Sustainability Initiative (USI)	Provost and VP Academic
Andy Lam	Associate Director, Institutional Programs Office	VP Research and Innovation
Andrew Parr	AVP, Student Housing and Community Services	VP Students
Paula McCready	Associate Director, Ancillary Procurement	VP Students
Steve Alb	Director, Bookstore	VP Students

Others were invited to the working group and reserved the option to attend when subject matter evolves to include their area of expertise.

Appendix B

Resources

- [Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023, c 9](#)
- [Government Guidelines on Report Preparation](#)
- [Global Slavery Index – Prevalence Data](#)
- [United Nations Guiding Principles on Business and Human Rights](#)