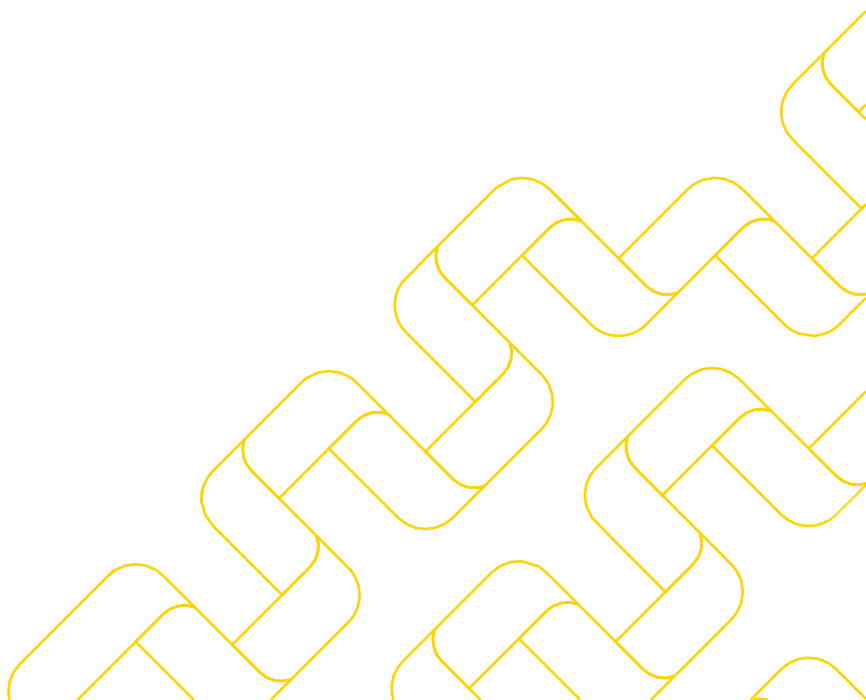




DALHOUSIE
UNIVERSITY

Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9)

2024-2025 Fiscal Year Report



This report is filed on behalf of Dalhousie University (“**Dalhousie**” or the “**University**”) in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c. 9 (the “**Act**”). Pursuant to section 11 of the Act, this report details the steps taken by the University during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by the University or of goods imported into Canada by the University.

This report is filed for the University’s April 1, 2024 – March 31, 2025, fiscal year.

I. Structure, Activities and Supply Chains

Structure

Legal Name:

Dalhousie University

Background and Mandate:

Founded in Halifax, Nova Scotia, in 1818, Dalhousie is Nova Scotia’s leading research-intensive university, offering educational degrees across 13 diverse faculties. Dalhousie’s mission is to lift the intellectual, social, and economic vitality of its local, national, and global communities through an institution-wide commitment to a world-class student experience, interdisciplinary collaboration, and mutual respect and inclusion in all aspects of its academic, research, and civic priorities.

Dalhousie has three campuses located in Halifax, Nova Scotia, an Agricultural Campus located in Bible Hill, Nova Scotia, and program-specific campuses in Yarmouth, Nova Scotia, and Saint John, New Brunswick. As of its latest enrolment report (December 1, 2024), the University had 20,921 students enrolled across its faculty groups. At the time of filing this report, Dalhousie employs approximately 5,838 employees.

Legal Status:

Dalhousie University is a body corporate and politic created by statute under the laws of Nova Scotia, Canada. Dalhousie is recognized as a non-profit organization incorporated through provincial legislation and is registered as a charitable organization under the name DALHOUSIE UNIVERSITY.

Organizational Structure:

Dalhousie operates under a bicameral governance structure, meaning it has two governing bodies: its Board of Governors and its Senate. The Board of Governors is responsible for the overall management of the University, with particular responsibility for property, revenue, and finances. The Senate is an academic governing body responsible for overseeing the academic and research activities of the University. Dalhousie’s President and Vice-Chancellor is responsible to the Board of Governors and the Senate for the supervision of the University’s administrative and academic work. The President and Vice-Chancellor works with the University’s senior administrative team to provide leadership to the University.

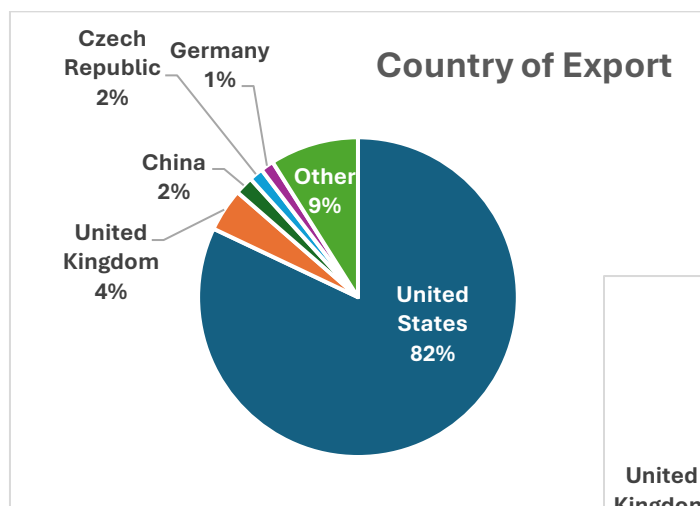
Activities and Supply Chains

Importation Activities

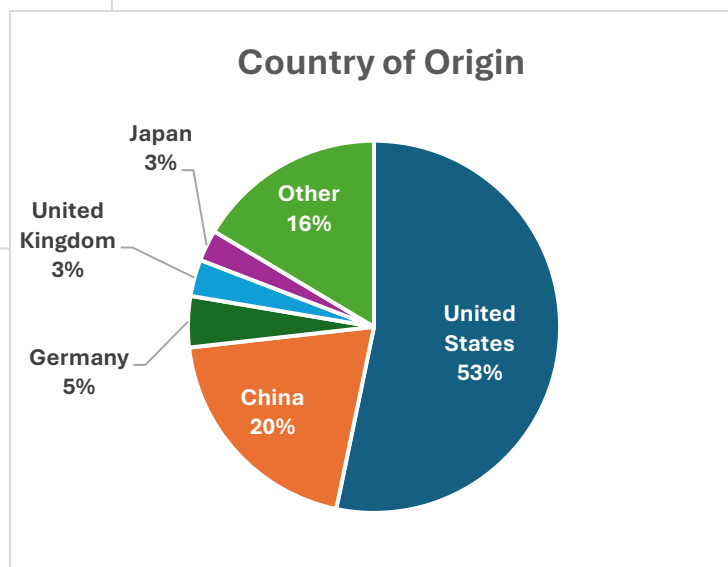
As a research-intensive university, Dalhousie's primary activities are teaching and research. To support these activities, the University procures a wide range of goods and services, primarily from direct suppliers within North America. During its 2024-2025 fiscal year, Dalhousie spent approximately \$225 million in procurement-related expenditures.

During its 2024-2025 fiscal year, Dalhousie was the importer of record under the *Customs Act* for 4,839 goods from outside of Canada (the "**Imported Goods**"). The total value of the Imported Goods was approximately \$13.3 million, representing approximately 6% of the University's procurement-related expenditures, for its 2024-2025 fiscal year.

The Imported Goods were imported from 54 countries in total, with 82% imported from the United States. The top five countries of export are identified in the chart below:



The Imported Goods originated from 70 countries in total. The top five countries of origin are identified in the chart below:



The largest categories of goods imported by the University each year includes scientific and research equipment, biological matters, diagnostic or laboratory reagents, and print materials such as books, brochures, and leaflets.

Production Activities

Agricultural Campus

In 2012, Dalhousie merged with the former Nova Scotia Agricultural College located in Bible Hill, Nova Scotia, and thereby established the Dalhousie Agricultural Campus (the “**Agricultural Campus**” or the “**Campus**”). The Agricultural Campus is home to an operational farm.

Through its Agricultural Campus, the University provides diploma, undergraduate, Master of Science, and PhD students interested in pursuing a career in agriculture or veterinary medicine with experiential learning opportunities in production agriculture pertaining to dairy, sheep, poultry, livestock feed, and crops. The Campus’ farm utilizes best management practices to demonstrate the importance of animal care and welfare, nutrition, reproduction, housing and environmental stewardship and how they impact the primary production of milk, eggs, chicken, livestock, and crops. The goods produced are later processed and sold within the markets and regulatory bodies that support these commodities.

The following table includes the approximate quantities of goods produced and sold or used at the Campus during the University’s 2024 – 2025 fiscal year:

Good Produced, Used, or Sold	Quantity Produced, Used, or Sold
Milk produced and sold	494, 503 litres
Livestock (dairy) total inventory	79 (cows, heifers, and calves)
Livestock (dairy) sold	29 cull & open cows/bull & beef calves
Livestock (sheep) total inventory	160 (ewes, rams, and lambs)
Livestock (sheep) sold	75 (lambs and breeding stock)
Livestock (mink) total inventory	1674 (adults and kits)
Livestock (mink pelts) sold	1674 (adults and kits)
Livestock (layers) total inventory	2586
Eggs produced and sold	55, 000 dozen
Broilers (meat birds) produced and sold	2378
Crops (barley) produced and sold	30 tonnes
Crops (soybeans) produced and sold	7.7 tonnes
Crops (legume/grass silage and hay) produced and used on farm	640 tonnes silage; 247 round bale hay; 450 square bale hay
Crops (corn silage and grain) produced and used on farm	414 tonnes corn silage; 55 tonnes grain corn
Crops (mixed vegetable)	14, 500 lbs

In the course of their studies, students of the Agricultural Campus also learn about the strategic selection of inputs to maximize the efficiency, yield, and quality of agricultural products. In its procurement of goods to support its Agricultural Campus production activities, the University primarily sources goods from Atlantic Canadian suppliers. The University chooses to procure from

local vendors to reduce transportation time and costs, ensure products are best suited to the Agricultural Campus' geographical and climatic conditions, and demonstrate the University's commitment to support its local industries and economy.

TUNS Brewery

To support teaching and research within the University's Faculty of Engineering, the University operates a small-scale brewery funded by the Faculty of Engineering and the Canadian Institute of Fermentation Technology. The brewery, known as the TUNS Brewery, provides engineering students with the opportunity to brew their own beer and learn about all aspects of fermentation processes through an undergraduate course in brewing science. The beer produced is then primarily sold to student bars on campus as a way to showcase the capabilities of students interested in brewery science and to engage students, faculty, industry, and the public. In a given school year, approximately 24 twenty-litre kegs are produced through the brewery.

II. Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

Procurement Framework

As a public institution, Dalhousie 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. Dalhousie has developed a set of policies which, together, establish the governing framework for procurement activities at the University:

- [Dalhousie University Procurement Policy](#);
- [Dalhousie University Procurement Code of Conduct](#);
- [Dalhousie University Spending Authority for University Funds](#);
- [Supplier Code of Conduct](#) (Effective January 6, 2025); and
- Purchasing Methods and Dollar Limits (for internal use only).

Together, these policies aim to establish a University procurement framework that is ethical, equitable, and transparent. The University's central Procurement department engages in periodic reviews of these procurement policies, as well as regular reviews of University-wide procurement requests, to ensure compliance with applicable procurement legislation and international free trade agreements.

Supplier Code of Conduct

During its 2024-2025 fiscal year, the University developed and implemented a Supplier Code of Conduct, effective January 6, 2025, which establishes the requirement that the University's suppliers (and their subcontractors):

- i) will not use forced or child labour in their own operations; and

- ii) will take steps to prevent and reduce the risk that forced labour or child labour are used in their supply chains.

As outlined in the “Assessing Effectiveness” section below, the University’s suppliers will be required to confirm their compliance with the Supplier Code of Conduct when registering as a supplier in the University’s e-procurement platform. The Supplier Code of Conduct states that the University reserves the right to cease business with any supplier that fails to comply with its Supplier Code of Conduct.

The University is currently updating its Procurement Policy and Procurement Code of Conduct to align with, and incorporate by reference, the Supplier Code of Conduct. Through these updates, specific prohibitions on the use of forced or child labour will be incorporated into the University’s Procurement Policy and Procurement Code of Conduct.

Sustainability Policy and Checklist

Dalhousie’s Office of Sustainability strives to ensure that sustainability is woven into all of the University’s activities. The Office of Sustainability has developed the University’s [Sustainability Policy](#), which applies to all administrative activity within the University, including procurement.

Section 1.5 of the Sustainability Policy sets out sustainability criteria to be used by the University in evaluating procurement, including environmental, economic, social, and health considerations. In keeping with this intent, the policy sets out a list of eighteen sustainability actions, and states that it is important to the University that its sponsors, suppliers, contractors, consultants, vendors, and agents commit to the list of actions. The list includes a commitment that suppliers and vendors:

- **Support no use of forced labour**, including prison labour, indentured labour, bonded labour, or other forms of forced labour; and
- **Prohibit the use of forced and child labour**. No person shall be employed under the age of 14 or under the age for completion of compulsory education, whichever is higher.

University employees also have access to the internal Dalhousie University Sustainable Procurement Checklist, which serves to guide employees to consider sustainability criteria when making purchasing decisions. Employees are invited to send the checklist directly to potential vendors to ensure vendors are aware of the sustainability criteria that are important to the University. The checklist includes the criteria that suppliers meet applicable employment standards, including that they do not use forced labour or child labour in their activities.

Fair Labour Association Membership and Fairtrade Campus Designation

In 2021, Dalhousie became a member of the Fair Labour Association. Established in 1999, the Fair Labour Association is a multi-stakeholder initiative that includes universities and civil society organizations from around the world who are committed to protecting workers’ rights through adherence to international labour standards. As members of the Fair Labour Association, the University has access to comprehensive resources relating to global labour rights issues.

In January of 2024, Dalhousie earned its Fairtrade Campus Designation through Fairtrade Canada. To earn this designation, Dalhousie made a commitment to prioritize the availability of Fairtrade products across its campuses to ensure that members of the Dalhousie community have access to ethically sourced goods. The University also created a Fairtrade steering committee composed of active volunteers and administrative members that will meet regularly to organize events and activities to increase the visibility of Fairtrade products on campus and educate the Dalhousie community about the meaning of fair trade.

Sustainability Guides for Employees and Student Societies

In recognition of the high-risk nature of the garments and linen industry (an industry from which the University procures goods), the University has established an [online guide for sustainable procurement of garments and linens](#). The guide encourages University employees and student societies to consider the impact of their procurement choices when purchasing garments and linens, and provides a list of key considerations that should be made when purchasing clothing, such as ensuring that no forced labour or child labour was used in the clothing's supply chain. The guide also provides University members with a list of suggested questions to ask vendors when purchasing linens and garments, including:

1. Are vendors and factories compliant with international labour standards that protect workers rights by prohibiting child/forced labour, protecting health and safety, and ensuring wages and hours meet legal industry standards?
2. Do vendors comply with the Fair Labour Association's Code of Conduct and/or the Worker Rights Consortium Code of Conduct?

The guide encourages University members to purchase clothing that is locally produced, when possible.

Internal Human Resources Policies

With respect to its own production activities, the University has robust human resources policies and due diligence processes in place to ensure that the University's employment of all of its employees – including those engaged in production at its Agricultural Campus – meets minimum employment standards established under provincial employment standards legislation. Employment of unionized employees at Dalhousie is governed by collective agreements which have been negotiated between the University and applicable representative unions. As part of the hiring confirmation process, prospective employees are required to provide appropriate documentation to confirm their legal eligibility to work in Canada, including SIN numbers, date of birth, and other relevant materials to ensure legal and tax compliance.

III. Supply Chain Risks: Forced Labour and Child Labour

Dalhousie currently relies on international literature, reports, and guidance to identify and assess risks of forced labour and child labour in its supply chains. Drawing from the [United Nations' report on Ending Child Labour, Forced Labour, and Human Trafficking in Global Supply Chains](#), the University recognizes that the production of textiles and apparels, wholesale and retail goods, and

agricultural products carry a particularly high risk of forced labour or child labour. Similarly, from the United States' Bureau of International Labor Affairs' published [List of Goods Produced by Child Labor or Forced Labor](#), Dalhousie has identified textiles, garments, food products, metals (used to produce reagents), timber (used to produce printed materials), electronics, rubber gloves, lithium batteries, and surgical instruments as high-risk goods that are procured by the University.

The Walk Free Organization has identified the [Top 10 countries with the highest prevalence of modern slavery](#). The University has identified that approximately 0.2% (13 imports) of its total Imported Goods for its 2024-2025 fiscal year originated in the top 10 countries with the greatest identified risk. As explained in the "Next Steps" section below, the University commits to continue its efforts to assess risks of forced labour or child labour in its supply chains.

IV. Remediation Measures

As Dalhousie has not yet identified any specific instances of forced labour or child labour in its supply chains, no measures have been taken in this area.

V. Remediation of Loss of Income

As Dalhousie has not yet identified any specific instances of forced labour or child labour in its supply chains, no measures have been taken in this area. However, the University's Supplier Code of Conduct states that where a child worker is displaced as a result of a supplier's compliance with the Supplier Code of Conduct, adult family members shall have the opportunity to assume the child's position in order to maintain family earnings.

VI. Training

In its 2024-2025 fiscal year, and following a commitment made in its 2023-2024 report under the *Act*, the University developed a training program focused on forced and child labour in global supply chains. This training currently includes three sessions of educational videos, articles and information from industry experts. A quiz, developed in-house, follows each session to assess understanding and reinforce key learnings. The comprehensive training includes, amongst other things:

- Definitions of forced labour and child labour;
- Identification of forced labour and child labour risks, including risks present beyond Tier 1 suppliers;
- Identification of high-risk sectors, such as agriculture, textiles, and electronics;
- The legal and regulatory framework around preventing and reducing forced labour and child labour, including the *Act*, associated reporting obligations, and import bans;
- The different forms of forced labour, such as bonded labour; and
- Practical steps to prevent and reduce instances of forced labour and child labour in the University's supply chains, such as supplier screening, contractual requirements, and technological solutions.

The training draws on international resources, experts, and investigative reports relating to forced labour and child labour on a global scale. Participating staff also explore global frameworks such as the UN Guiding Principles on Business and Human Rights. The training reinforces transparency, collaboration, and education as critical tools for implementing and achieving ethical business practices and mitigating risks of forced labour and child labour in the University's supply chains.

At the time of filing this report, the University's Procurement department has completed this training. The University plans to further expand the training to staff within the University's Procure to Pay services department, and later to the broader University staff community.

With respect to its own activities, the University offers training to unionized employees, as well as individuals in supervisory positions, to ensure a shared understanding of employees' rights under their governing collective agreement, including provisions related to hours of work, compensation, and entitlement to overtime.

VII. Assessing Effectiveness

In its 2024-2025 fiscal year, the University took the following steps to assess its effectiveness in reducing the risk that forced labour and child labour are used in its supply chains:

- The University conducted training sessions with its Procurement staff to raise employee awareness of forced and child labour in supply chains, accompanied by quizzes to assess learning;
- The University implemented a Supplier Code of Conduct with compliance measures outlining its expectation that suppliers will not use forced or child labour;
- The University is requiring its suppliers acknowledge compliance with the Supplier Code of Conduct upon registering on the University's e-procurement platform, DalBuy;
- The University has incorporated the Supplier Code of Conduct into its terms and conditions of bidding for public bid documents (RFx) advising suppliers that the awarded bidder will be required to comply; and
- The University has undertaken a review of its Procurement Policy and Procurement Code of Conduct and will include prohibitions on the use of forced labour and child labour in our purchasing decisions in the updated policies.

VIII. Next Steps

The University commits to take the following steps to continue its work to identify and reduce risks of forced labour or child labour in its supply chains:

- **Training.** The University commits to expand existing training to staff within Procure to Pay services and later to other employees at the University who are involved with procurement activities;
- **Policy Review.** The University is currently updating its Procurement Policy and Procurement Code of Conduct to incorporate specific wording relating to prohibiting the use of forced labour and child labour in its supply chains;

- **Contracts and Purchase Order Terms and Conditions.** The University is currently reviewing its applicable standard form contracts and purchase order terms and conditions with the aim of incorporating specific wording relating to prohibiting the use of forced labour and child labour in its supply chains;
- **Collaboration and Mitigation.** The University commits to collaborate with its Office of Sustainability and peer institutions across Canada to identify key risk areas within University supply chains and continue to explore practices to mitigate the use of forced labour or child labour in its supply chains; and
- **Improve Visibility Over Supply Chains.** The University has started to implement a new supplier management and electronic procurement system as of March 2025. The University anticipates that the system will improve the University's record-keeping with respect to its procurement activities and improve the University's visibility over its supply chains, which will assist the University in identifying and assessing risks of forced labour and child labour in its supply chains moving forward. The University anticipates having the system in place for all procurement activities with its clients by the third quarter of 2025. However, gathering meaningful spend data will require time, and efforts to onboard suppliers and enhance supply chain visibility will continue throughout 2025-2026.

IX. Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in the capacity of President and Vice-Chancellor of Dalhousie University, attest that the information contained in this report has been reviewed and approved by the Dalhousie Board of Governors. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

I have the authority to bind Dalhousie University



Kim Brooks

President and Vice-Chancellor

May , 2025