



### b) Policies and Due Diligence Processes

We are in the process of developing a **Social Procurement Policy** that will explicitly address forced labor and child labor. Additionally, a **Supplier Management and Performance program** is underway. These initiatives will enhance our due diligence processes and ensure compliance with ethical standards.

### c) Risk Assessment and Mitigation

The following areas within our business and supply chains carry a higher risk of forced labor or child labor:

- **Bookstore Goods:** Clothing, gift items, and promotional items sold in our bookstore.

#### **Steps Taken to Assess and Manage Risk:**

- **Supplier Due Diligence:** We will assess suppliers in the bookstore category more rigorously once our Social Procurement Policy and Supplier Management Program is in place in the upcoming fiscal year.
- **Contract Clause:** In all contracts with suppliers, we will require a warranty that there is no use of forced labour or child labour in the provision of goods and services
- **Collaboration:** We plan to collaborate with industry associations and other institutions to share best practices.

### d) Remediation of Forced Labor or Child Labor

While we currently lack specific measures, our future approach will include:

- **Immediate Action:** Ceasing business with any supplier involved in forced labor or child labor.

- **Investigation:** Investigating the root cause and collaborating with relevant authorities.
- **Remediation Plans:** Developing plans to address any identified issues.

#### e) Measures to Remediate Loss of Income

We recognize that eliminating forced labor or child labor may impact vulnerable families. Our future measures will include:

- **Community Support:** Collaborating with local organizations to provide support to affected families.
- **Alternative Livelihoods:** Exploring opportunities for income generation beyond exploitative practices.

#### f) Training on Forced Labor and Child Labor

Once our policies are in place, we will provide regular training to our employees, including:

- **Awareness:** Educating employees about the signs of forced labor and child labor
- **Reporting Mechanisms:** Establishing clear channels for reporting concerns related to labor practices.

#### g) Assessing Effectiveness

We will evaluate our efforts through:

- **Metrics:** Tracking key performance indicators related to labor practices.
- **Feedback:** Gathering feedback from employees, suppliers, and stakeholders.
- **Continuous Improvement:** Regularly reviewing and enhancing our processes.

### **Proactive Measures and Future Plans for Compliance with Bill S-211**

NorQuest College has long been committed to ethical practices and the well-being of individuals in our community. In alignment with these values, we had initiated the development of a Social Procurement Policy and a Supplier Performance Program well before the introduction of Bill S-211. These initiatives were born out of our dedication to social responsibility and a desire to lead by example in our industry.

- **Social Procurement Policy:** Our Social Procurement Policy, which was already in the planning stages, is designed to ensure that our suppliers uphold the same high standards of labor practices that we do. This policy will enable us to evaluate potential suppliers on various social criteria, including their track record on forced labor and child labor. The implementation of this policy, scheduled for the 2025 fiscal year, will solidify our commitment to ethical sourcing.
- **Supplier Performance Program:** Similarly, the Supplier Performance Program was conceived as a means to monitor and manage supplier conduct continuously. This program will involve systematic audits and assessments to ensure ongoing compliance with our ethical standards. Suppliers will be expected to demonstrate their commitment to fair labor practices, and we will have measures in place to address any discrepancies that arise. This program is also scheduled to launch within the 2025 fiscal year.

These pre-existing initiatives demonstrate NorQuest College's foresight and commitment to ethical operations. With the advent of Bill S-211, we are well-positioned to not only meet but exceed the requirements set forth, ensuring that our supply chains are free from forced and child labor. Our proactive

approach underscores our resolve to be at the forefront of ethical practices in supply chain management.

### **Reporting Requirements Compliance**

In accordance with the reporting requirements of Bill S-211, NorQuest College will:

1. **Prepare an annual report** detailing the steps taken to prevent and reduce the risk of forced labor in our supply chain.
2. **Obtain approval and attestation** from the appropriate governing body.
3. **Complete the online questionnaire** provided by Public Safety Canada.
4. **Upload the completed report** in PDF format to the online questionnaire portal.
5. **Publish the report** on NorQuest College's website and ensure it is accessible to the public.
6. **Monitor Compliance** with Bill S-211 on an annual basis to ensure NorQuest is meeting legislative obligations

### **Conclusion**

NorQuest College is dedicated to upholding the principles of Bill S-211 and will continue to develop and implement measures to ensure our supply chains are free from forced labor.

**Consent Statement:** By signing this report, I, the undersigned, confirm that the information provided herein accurately reflects NorQuest College's efforts and intentions regarding compliance with Bill S-211. I authorize the submission of this report to the Minister of Public Safety.

**Krysta  
Wetterberg**

Digitally signed by Krysta Wetterberg  
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