



ANNUAL REPORT

PURPOSE

This annual report for the 2026 reporting cycle, has been created by Sault College of Applied Arts and Technology (“**Sault College**” or the “**College**”) for the sole purpose of meeting its obligations and reporting requirements under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “**Act**”).

OUR COMMITMENT

Sault College remains committed to preventing and reducing the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, including goods that Sault College imports into Canada.

STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Sault College is a publicly funded Crown agency that administers post-secondary and continuing education programs and apprenticeships, both online and on campuses in Sault Ste. Marie, Brampton, and Toronto, Ontario.

Sault College sources goods including teaching materials, computers and electronics, research and lab equipment, and machinery (including aircrafts) used in instruction. Certain goods are also sold on campus by third-party vendors. These goods include textbooks, apparel, and food.

Sault College works with collaborative sourcing partners in the Canadian education space to assist with its procurement efforts. Most goods are obtained from suppliers within Canada and where possible, within Ontario. Generally, Sault College only imports goods from overseas if those goods are unavailable in Canada (for example, aircraft parts).

STEPS TAKEN BY SAULT COLLEGE IN PRIOR FISCAL YEAR

To prevent and reduce the risk that forced labour or child labour is used at any step of goods imported into Canada, Sault College maintained related policies and due diligence processes that were in force throughout the 2026 fiscal year. These policies and processes helped to mitigate the risk of forced or child labour within its own internal organization and supply chain.

POLICIES AND DUE DILIGENCE PROCESSES

In the prior fiscal year, Sault College maintained several policies and processes which affirm its commitment to abiding by applicable forced labour and child labour laws, including:

- (a) Since June 2024, the College has implemented a confidential “Protected Disclosure (Whistleblower) Policy” (the “**Policy**”). The Policy provides a confidential process and procedure by which an individual can disclose wrongdoing from members of the College’s

Community. “Wrongdoing” is defined broadly and includes criminal offences or other violation of federal, provincial or municipal law, which necessarily would include actual or perceived instances of forced and/or child labour. The Policy binds all members of the College’s Community, including both employees and any agent, vendor, subcontractor, or company providing services to the College.

- (b) Sault College’s Procurement Policy is guided by its aim to maintain high ethical, legal and environmental standards. It also incorporates Sault College’s Environmental Policy, which requires all Sault College purchases, development, and improvements to be structured in a way that minimizes negative environmental impact and that is environmentally sound, including from a sustainability, social responsibility, and fair labour practice perspective.
- (c) The College leverages the supplier network of a collaborative sourcing partner in the Ontario education and public sector. Suppliers within this network are subject to the sourcing partner’s Code of Conduct, which requires supplier compliance with applicable domestic and foreign laws, including with respect to health and safety, labour, employment and human rights, and expressly requires suppliers to be able to demonstrate that their workplaces do not accept child labour; that employees are free to raise workplace concerns without fear of reprisal; and; apply employment standards that meet or exceed legal and regulatory requirements.
- (d) The College abides by the Broader Public Sector Procurement Directive (Ontario), including its Supply Chain Code of Ethics. The Supply Chain Code of Ethics affirms the College’s commitment to work continuously to improve its supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share leading practices to ensure an ethical, professional, and accountable supply chain.
- (e) Sault College maintains general due diligence processes that promote responsible, ethical and legal procurement practices, including with respect to labour practices within the supply chain.
- (f) The College maintains workplace policies and procedures to operate in compliance with provincial employment standards, human rights, and occupational health and safety legislation.

FORCED LABOUR AND CHILD LABOUR RISKS

Moving forward, Sault College will continue working to identify specific risks of forced labour and child labour that may exist in its supply chain. It is aware that there may be higher risks associated with certain regions, goods, and industries.

REMEDATION MEASURES

Sault College has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

