



Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”)

**Annual Report for Fiscal Year
April 1, 2024 to March 31, 2025**

Introduction

This report prepared by St. Francis Xavier University (“StFX”) constitutes its first report to the Fighting Against Forced Labour and Child Labour in Supply Chain Act (“the Act”). The financial year being reported is April 1, 2024 to March 31, 2025. This report is being filed for the above-named entity, in accordance with section 11(2) of the Act.

Structure, Activities and Supply Chains

Structure – Reporting Entities:

St. Francis Xavier University (“StFX”), located in Antigonish, Nova Scotia, is a not-for-profit organization. Jointly, this group will be referred to as the “University”, “StFX” or “we”.

St. Francis Xavier University operates under a bi-cameral model of governance whereby the [Board of Governors](#) is responsible for management and control of the University, while the [Senate](#) is responsible for academic policy and programs.

The responsibilities of the Board of Governors and Senate are set out in the [St. Francis Xavier University Act \(amended in 2022\)](#) with procedural matters being further elaborated in the [University’s By-laws](#).

The primary role of StFX is to provide post-secondary educational, research, and community services. There are no additional reporting entities.

Activities and Supply Chain:

The University procures material from suppliers and vendors to support the provision of education, research and accompanying goods and services. Goods are primarily procured from suppliers within Canada. In relation to the purposes of the Act, the University imported a small percentage of supplies (valued at less than 3.5% of total expenditures on supplies) into Canada for the fiscal year April 1, 2024 through March 31, 2025. Approximately 97% of these imported items were sourced from suppliers located in Europe and the United States.

Policies and Due Diligence Processes

The University recognizes our responsibility to protect and respect the human rights of all people who support our university community. Our current [Strategic Plan \(2023-2028\)](#) outlines the values of the University and includes sustainability as a core University value. We are committed to promoting and protecting human rights in the countries from which we import our supplies. We expect our suppliers uphold the same commitment to fighting forced labour and child labour in their own supply chains.

Our suppliers are critical collaborators in delivering educational services and we strive to work with partners who are aligned with our values and commitments. All suppliers are expected to adhere to the University’s standard purchase order terms and conditions. These terms and conditions are contractually binding and require suppliers to comply with all pertinent laws, orders and regulations. This would include compliance with forced labour and child labour laws. The University reserves the right to terminate any agreement with any supplier that cannot demonstrate compliance with the terms and conditions.

The University's Procurement Policy seeks, in part, to ensure that all procurement decisions include sustainability criteria that consider the environmental, economic, social and ethical factors of the purchase.

Our [Procurement](#) and [Conflict of Interest](#) Policies provide the standards for ethical behaviour for our employees to ensure a high standard of professional integrity, ethics and impartiality to maintain the public trust in the University and to protect the integrity for all working for and associated with the University.

Parts of Supply Chain that Carry a Risk of Forced Labour or Child Labour and Steps Taken to Assess and Manage that Risk

The University reviews its supply chain for its importing activity, including identifying countries of origin for significant suppliers and assessing the risk inherent in procuring from said countries. The University makes efforts to manage the risk associated with imported product in the supply chain by procuring supplies through a small number of trusted suppliers, the majority of which are located in countries with legislation enacted to preserve and protect human and workers' rights.

Clothing and footwear have been identified as an area of risk for forced labour and child labour within the University's supply chain. To mitigate this risk, the University included a Supplier Code of Conduct in the Request for Proposal and resulting contract for Athletics Apparel outlining the standards required by StFX, including specifically that child labour and forced labour are not permissible within the supply chain.

Remediation Measures, if Applicable

Based on our knowledge, the University has not identified any instances of forced labour or child labour in our supply chains. Consequently, no remediation measures were required for the fiscal year ended March 31, 2025, in respect of any modern slavery – including forced labour or child labour.

Remediation Measures re: Loss of Income to Vulnerable Families, if Applicable

The University has not identified any instances of forced labour or child labour in its supply chains, and therefore has not taken any associated measures to remediate the loss of income to the most vulnerable families that result from measures taken to eliminate the use of forced labour or child labour in their supply chains.

Training Provided to Employees

Training regarding the Act has been completed by some supply chain staff through the Canadian Association of University Business Officers. StFX will gather further information on the Act and develop a training plan if necessary. In addition, StFX is a member of the Interuniversity Services Incorporated, a not-for-profit organization that represents members of 19 universities and colleges from throughout Atlantic Canada. This group conducts environmental scans to advise members of the latest training and information with respect to the Act.

Assessing Effectiveness of Measures Taken

The University does not employ any other formal metrics to assess our effectiveness in ensuring that forced labour and child labour are not being used in our other supply chains. However, we intend to continue monitoring our supply chain for indicators of forced labour and child labour including performing due diligence on new vendors and on existing vendors to the extent that we learn of material changes in their circumstances. We will continue to advise staff to be aware of the risks related to forced labour and child labour. We will continue to review our policies and processes to address this important risk, as conducting our business with ethical and moral integrity is critical to earning and maintaining the trust of our students, faculty, employees, and community.

Approval and Attestation

This report has been approved by the Board of Governors of St. Francis Xavier University on April 14, 2025 in accordance with the Fighting Against Forced and Child Labour in Supply Chains Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Dr. A. Hakin, President and Vice-Chancellor
St. Francis Xavier University
Date: April 15, 2025

I have the authority to bind St. Francis Xavier University on behalf of the Board