



# FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

NOSM University Annual Report for 2025

Response to Bill S-211  
May 31, 2025

## Preamble

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2024* (the Act) came into force January 1, 2024. The Act mandates transparency and accountability in supply chain practices to eliminate forced labour and child labour.

In accordance with Section 11 of the Act, NOSM University is required to, on or before May 31 of each year, report on the steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used by the University or its supply chains. The following report sets forth the efforts made to comply with the requirements of the Act since the last annual report was completed.

## Entity Information

NOSM University is classified as an entity under the Act as it meets the size-related thresholds described therein.

Entity details are detailed below:

Legal Name	Northern Ontario School of Medicine (NOSM) University
Financial Reporting Year	May 1, 2024, to April 30, 2025
Identification of a Revised Report	N/A
Business Number	864660352
Identification of a Joint Report	N/A
Reporting Obligations in Other Jurisdictions	N/A
Categorization According to the Act	Entity (University)
Sector/Industry	Educational Services, Public Sector
Location	Sudbury, Ontario, Canada and Thunder Bay, Ontario, Canada

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## Structure

NOSM University is Canada's first independent medical university, with main campuses in Sudbury and Thunder Bay. The University is known for educating physicians and healthcare professionals to work in underserved communities; cultivating interdisciplinary research and learning; assembling a network of cohesive academic and clinical sites in more than 90 communities; and for its social accountability mandate to address the concerns of the peoples and communities of Northern Ontario.

In addition to offering a Committee on Accreditation of Canadian Medical Schools (CACMS) fully accredited MD program, NOSM University offers a Master of Medical Studies, Northern Ontario Dietetic Internship Program (NODIP), Medical Physics Residency Education Program (MPREP), Physician Assistant (Pas), and Postgraduate Residency programs accredited by both the Royal College of Physicians and Surgeons of Canada (RCPSC) and College of Family Physicians of Canada (CFPC).

Key indicators related to the success of our mandate are detailed below:

- As of June 2024, NOSM University has graduated 971 MDs—80 are Indigenous and 198 are Francophone. More than half of these physicians have stayed in Northern Ontario.
- On average, 52.67% of NOSM MD graduates select Family Medicine as their first choice for residency, compared with 38.20% for all Canadian applicants.
- All NOSM University medical students have a first-year placement in what is called Integrated Community Experience (ICE). This is a mandatory four-week placement in a First Nation community, a Métis organization, or an Indigenous health organization in Northern Ontario.
- As of June 2024, 889 residents have completed training in NOSM University's residency programs. This includes residents who have completed more than one (1) residency program. Of these, 31 are Indigenous and 59 are Francophone.
- To date, NOSM University has graduated 207 learners who go on to become Registered Dietitians. Notably, 75% of the last three graduate cohorts are practicing in Northern Ontario.
- NOSM University currently has 42 Indigenous community partnerships who have signed long-term partnership agreements to host students. The long-term partnership provides a framework for both NOSM University and respective signatory to work in collaboration to ensure a successful placement for both community and students.

NOSM University currently admits 88 students into the UME program and 105 into the PGME programs. The University has been approved for expansion to 108 UME and 123 PGME positions.

Currently, the University employs 318 people (faculty, librarians, and staff) as well as approximately 1,800 clinical faculty members.

The 2024-2025 operating budget was \$63,525,000.

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NOSM University operates under a bi-cameral governance structure, with two governing bodies. The NOSM University Board of Governors is responsible for overall management of the University, with responsibility for oversight of operations such as property, revenues and finance; the Senate is responsible for overseeing the academic and research activities of the University.

The Board of Governors has a number of committees with delegated responsibilities. These include the Board Executive Committee, Finance, Audit and Risk Management Committee, Governance Committee as well as several ad hoc committees and task forces.

### Supply Chain Details

NOSM University reaffirms its commitment to ethical sourcing practices and is not involved in the production of goods in Canada. NOSM University continues to have very minor dealings in activities with the potential risk that forced labour or child labour is used at any step of the production of goods in Canada. Regardless of the risk being considered minor, the University is committed to taking steps to prevent and reduce the risk of forced labour or child labour.

The following measures were taken in the last fiscal year:

1. Supplier vetting

Proponents submitting a bid to an RFX project that is posted publicly are required to sign and submit the *Form of Offer*, which specifically states the Proponent “warrants that the goods and services that the Proponent is proposing to provide to the Purchaser are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act).”

When appropriate, the *Form of Agreement* is signed by the Proponent is required to attest that “the Goods and any services provided by the Supplier under this Agreement are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act)

2. Code of conduct

NOSM University is currently in the process of developing a Supplier Code of Conduct (SCC), which is expected to be implemented within the next year. This Code will include provisions related to forced and child labour, setting clear expectations for suppliers to uphold ethical business practices in alignment with Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act. In the interim, all suppliers are expected to adhere to responsible sourcing principles and ethical standards that align with the University’s commitment to human rights and sustainable procurement.

### 3. Collaboration

As active members of the Ontario University Professional Procurement Management Association (OUPPMA), NOSM University works collaboratively with universities across the province to develop strategies that reduce the risk of engaging with vendors involved in forced labour or child labour. Through collective efforts with OUPPMA and participation in various cooperative purchasing groups, we strengthen our procurement practices and further mitigate these risks. By leveraging collective purchasing power, NOSM University ensures compliance with current government mandates and upholds ethical procurement standards, particularly when purchasing across categories such as Research, Information Technology, Facilities, Library Acquisitions, Office Supplies, and Conference Events.

### Policies and Procedures

The institution maintains workplace policies and procedures such as the *Supplier Code of Conduct, Human Rights, Discrimination, Harassment, and Racism Prevention Policy and Procedure*, [Code of Respect](#), *Employment Equity Hiring Policy*, as well as the *Recruitment, Selection, and Hiring Policy*. These policies, along with others, aim to ensure compliance with provincial employment standards, human rights, and occupational health and safety legislation.

A finalized draft of the Policy Framework is set to work through the appropriate approvals in the coming months. Once adopted, all policies are expected to consider the following policy pillars, among others:

1. **Equity & Inclusion:** Analyzing the impact of the design and implementation of policies on under-served and marginalized individuals and removing barriers.
2. **Responsible Business Conduct:** Considering risk management and due diligence principles to identify and assess potential adverse impacts of policies.
3. **Legal and Regulatory Compliance:** Ensuring compliance with prevailing legislation, regulations, acts, etc.

Additionally, the *Building Ontario Business Initiative Act (BOBIA)* regulation outlines how public sector entities need to consider Ontario businesses when conducting procurement for goods and services under a specific threshold. This, coupled with the updates to the *Broader Public Sector (BPS) Procurement Directive*, resulted in the University making updates to the *Procurement of Goods and Services Policy*.

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## Training and Education

Procurement Services at NOSM University is dedicated to raising awareness about the requirements of Bill S-211. To support this initiative, we are collaborating with OUPPMA to develop a training framework on forced and child labour for procurement professionals. The framework is designed to equip procurement professionals with the knowledge and tools to identify and mitigate human rights risks in supply chains, ensure compliance with Bill S-211, and strengthen ethical procurement practices through informed decision-making, stakeholder engagement, and supplier accountability.

To provide structured training, a modular framework is being developed, offering targeted guidance on key aspects of human rights in procurement:

1. **Module 1: Awareness of Human Rights in Supply Chains**  
Explores procurement's role in ethical sourcing, key compliance requirements under Bill S-211, and identifying red flags in high-risk industries.
2. **Module 2: Interacting with Internal Clients on Human Rights**  
Focuses on legal, financial, and reputational risks, high-risk procurement areas, and balancing cost considerations with ethical decision-making.
3. **Module 3: Interacting with Suppliers on Human Rights**  
Offers strategies for setting expectations, addressing violations, conducting due diligence, and enforcing a Supplier Code of Conduct.

In parallel, the Ontario university sector is partnering with CASPAR, a national association dedicated to sustainable procurement, to develop an awareness video for decentralized purchasers across campus communities. This video will highlight human rights risks, modern slavery, and ethical supply chain management.

Module 1 of the training framework, which focuses on raising awareness of human rights in supply chains, has been released to OUPPMA members and is available for internal sharing. We plan to roll it out more broadly in the coming months, with additional modules to follow. The remaining training initiatives, including senior leadership awareness, are scheduled to launch in 2025, with detailed rollout plans to follow.

### Assessment of Supply Chain

The majority of NOSM University's purchases are made within Canada and therefore it places us in a position of minimal risk for procuring goods/services that are associated with forced labour and child labour. Our institution focuses on purchasing goods and services from reputable establishments and encourages all staff and faculty to ensure ethical sustainability is at the forefront of their purchases.

The BOBIA aims to leverage Ontario's purchasing power to support local businesses by reducing barriers and increasing access to procurement opportunities. By prioritizing Ontario suppliers, NOSM University contributes to strengthening local supply chain resiliency. This approach supports ethical purchasing by minimizing exposure to supply chains with higher risks of forced and child labour, reinforcing NOSM University's commitment to responsible sourcing and human rights protections.

### Approval and Attestation

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.

I have the authority to sign on behalf of NOSM University.

X *Sue LeBeau*

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Sue LeBeau

Chair, Board of Governors