



FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

NOSM University Annual Report for 2026

Response to Bill S-211
May 31, 2026

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, 2025, to April 30, 2026
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

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. The mission of the University, as detailed in the newly launched Rooted in the North Strategic Plan 2026 - 2030, is to strengthen Northern communities and health systems through socially accountable health education and research.

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, Dietetic Practicum Program (DPP), 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 May 2025, NOSM University has graduated 1041 MDs—92 are Indigenous and 214 are Francophone. More than half of these physicians have stayed in Northern Ontario.
- On average, 52.67% of NOSM University MD graduates select Family Medicine as their first choice for residency, compared with 38.20% for all Canadian applicants. Thirty-four of this year's MD graduates matched to family medicine, representing 49% of all MD graduates.
- 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.
- To date, NOSM University has graduated 215 learners who go on to become Registered Dietitians. Notably, 63% of the 2022-2025 graduates 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 114 into the PGME programs. The University has been approved for expansion to 108 UME and 123 PGME positions.

Currently, the University employs 330 people (faculty, librarians, and staff) as well as approximately 1,800 clinical faculty members.

The 2025-2026 operating budget was \$66,675,000.

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.

The Procurement Unit, which falls under Finance, is responsible for managing the procurement of goods and services at the University.

Supply Chain Details

NOSM University reaffirms its commitment to ethical sourcing practices and responsible procurement. The University does not manufacture goods and instead procures a broad range of goods and services in support of its academic, research, and administrative operations.

These procurement activities include, but are not limited to, office supplies, information technology equipment, laboratory equipment and supplies, food and catering services, facilities-related goods and services, and professional services.

The majority of NOSM University's procurement is conducted through Canadian suppliers; however, the University recognizes that many goods, particularly in categories such as electronics, laboratory supplies, and textiles, may involve complex global supply chains and originate from regions where there may be elevated risks of forced labour or child labour.

Over the past year, NOSM University continued to rely on established procurement processes, including competitive sourcing and contractual supplier attestations, to support responsible sourcing practices. The University also continued its participation in collaborative procurement initiatives and sector working groups, including the Ontario University Professional Procurement Management Association (OUPPMA), to strengthen awareness and alignment on supply chain risks and mitigation strategies.

While the University currently assesses its overall exposure to be relatively limited based on the nature and scale of its procurement activities, it acknowledges that risks may still exist within certain categories of goods. As such, NOSM University is committed to further enhancing its understanding of supply chain risks and identifying opportunities to strengthen due diligence measures in future reporting periods.

NOSM University continues to monitor developments in provincial procurement legislation, including the recently introduced Buy Ontario Act (Bill 72), which is expected to further support domestic sourcing practices within the public sector. As additional guidance becomes available, the University will assess how these changes may influence its procurement approach and supply chain risk profile.

The following measures were taken in the last fiscal year:

1. Supplier vetting

NOSM University continues to incorporate measures within its procurement processes to mitigate the risk of forced labour and child labour in its supply chain.

Proponents submitting a bid in response to publicly posted RFx opportunities are required to sign and submit the Form of Offer, which includes a representation that the goods and services proposed are not the result of, and do not involve, forced labour or child labour, as defined in Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Similarly, where applicable, suppliers entering into formal agreements with the University are required to attest that the goods and services provided are not associated with forced labour or child labour.

Where appropriate, executed agreements require suppliers to formally attest that the goods and services provided under contract comply with these requirements. These contractual attestations reinforce supplier accountability and establish clear expectations regarding compliance with applicable human rights legislation.

As part of ongoing efforts, NOSM University continued to apply these requirements across applicable procurement activities and has begun reviewing opportunities to further strengthen supplier due diligence processes, including the potential development of enhanced screening tools and supplier engagement practices.

NOSM University continues to monitor developments in provincial procurement legislation, including the recently introduced Buy Ontario Act (Bill 72). As of the end of the reporting period, the Building Ontario Business Initiative Act (BOBIA) remained in effect. The University will review and update its procurement practices, as required, once implementing regulations and directives under the Buy Ontario Act are released, to ensure continued compliance and alignment with provincial requirements. While the Buy Ontario Act is primarily focused on strengthening domestic procurement, NOSM University recognizes that local sourcing strategies may support broader efforts to reduce exposure to higher-risk supply chains.

2. Code of conduct

NOSM University continues to advance the development of a Supplier Code of Conduct (SCC), which will establish clear expectations for suppliers regarding ethical business practices, including the prohibition of forced labour and child labour within supply chains.

As part of this ongoing work, initial scoping and consideration of key risk areas and alignment with broader public sector and university-sector practices were undertaken to inform the development of the SCC. This includes consideration of emerging best practices and collaborative efforts through organizations such as the Ontario University Professional Procurement Management Association (OUPPMA).

Once implemented, the Supplier Code of Conduct is expected to be integrated into procurement processes and supplier agreements to reinforce accountability and support ongoing due diligence efforts.

In the interim, NOSM University continues to communicate expectations through existing procurement documents and contractual provisions, including supplier attestations related to forced and child labour.

3. Collaboration

NOSM University remains committed to enhancing awareness and understanding of the requirements under S-211. As part of this commitment, NOSM University continues to collaborate with the Ontario University Professional Procurement Management Association (OUPPMA) to advance a shared training framework aimed at addressing forced and child labour risks within university supply chains.

The objective of this framework is to equip university staff and procurement professionals with the knowledge and tools necessary to recognize and mitigate forced and child labour risks, support compliance with S-211, and reinforce ethical procurement practices. The training emphasizes informed decision-making, proactive stakeholder engagement, and clear supplier accountability.

Throughout the year, NOSM University continued to participate in sector-wide discussions and knowledge sharing initiatives through OUPPMA, contributing to the development and refinement of shared tools and resources.

NOSM University procures a broad range of goods and services, including but not limited to office supplies, information technology equipment, laboratory supplies, food and catering services, and professional services. These procurement activities are supported through collaborative purchasing arrangements and sector partnerships, which help strengthen due diligence practices and promote alignment with ethical sourcing expectations across the university sector.

Policies and Procedures

The institution maintains workplace policies and procedures such as the *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.

NOSM University is currently in the process of developing a Supplier Code of Conduct, which will outline expectations for suppliers regarding ethical business practices, including the prevention of forced and child labour in supply chains. It is anticipated that this Code will be implemented in a future reporting period.

The University is also developing a *Safe Disclosure Policy* and associated procedure to provide a confidential and safe reporting mechanism for reporting suspected wrongdoing in good faith. It further aims to foster a culture of compliance and accountability, while demonstrating the University's commitment to conducting business with ethics, integrity, and transparency. It is anticipated that the policy and procedures will be approved and in place in the next reporting period.

The recently approved Policy and Procedure Framework establishes the expectations for the development, implementation, and management of all policies and procedures at NOSM University. This framework provides guidance to ensure policies are created and maintained consistently and transparently, and are in alignment with the University's strategic objectives, legal obligations, and evidence-informed practices. It further aims to foster a culture of accountability, compliance, equity, diversity, and inclusion. As such, all policies are to be developed in consideration of following policy pillars:

- a) Strategic Alignment: Aligning policies with NOSM University values, mission, mandate and academic principles.
- b) Equity & Inclusion: Analyzing the impact of policy design and implementation on underserved and marginalized individuals and removing barriers. Creating and supporting a health-promoting work and learning environment.
- c) Sustainability: Incorporating principles of environmental sustainability into our planning, policy and decision-making.
- d) Accessibility: Considering the Accessibility for Ontarians with Disabilities Act (AODA) to understand the impact of the design and implementation of policies affecting people with disabilities.
- e) Responsible Business Conduct: Considering risk management and due diligence principles to identify and assess potential adverse impacts of policies.
- f) Legal and Regulatory Compliance: Ensuring compliance with prevailing legislation, regulations, acts, etc., as well as internal University approved definitions.

The University Policy & Regulatory Compliance Unit is in the process of developing checklists to ensure these guiding pillars are applied consistently.

Training and Education

Procurement at NOSM University is dedicated to raising awareness about the requirements of Bill S-211. In the previous reporting period, OUPPMA committed to a three-part training program that will deliver structured learning for procurement professionals on key forced and child labour considerations. The first module, which focused on “Awareness of Forced and Child Labour In Supply Chains”, was created in March 2025.

Over the past year, initial awareness training (Module 1) was completed by Procurement Services and the University Policy & Regulatory Compliance Unit. Plans are underway to expand delivery of this module to additional administrative units and stakeholders across the University to further support institution-wide awareness and capacity building.

In parallel, OUPPMA developed a dynamic, online companion course as an alternative format to delivering this awareness training and broadened the target audience to include university staff and community members. This course is being released in phases which align with institutional training protocols and scheduling.

In the coming year, OUPPMA will continue developing advanced training and best-practice resources for procurement professionals to support effective supplier engagement. This work, which has already begun, will emphasize proactive communication of expectations, risk identification and assessment, and how to treat high-risk purchases through public procurement practices.

Additionally, the Ontario university sector continues its strategic collaboration with CASPAR—a Canada-wide working group of procurement professionals dedicated to sustainable procurement—to share best practices and collectively strengthen efforts related to S-211 compliance across Canadian universities. During this reporting period, CASPAR has adapted its approach and re-aligned objectives and best practices to support sector-wide awareness, including the continued development of shared resources including an awareness video on human rights risks, modern slavery, and responsible supply chain management and responsible purchasing.

Assessment of Supply Chain

The majority of NOSM University’s purchases continue to be made within Canada, which may reduce direct exposure to higher-risk jurisdictions. However, the University recognizes that supply chains are often multi-tiered and global in nature, and that risks of forced labour and child labour may still be present at upstream levels.

Through contractual supplier attestations, ongoing policy development, sector collaboration, and training initiatives, NOSM University continues to strengthen its due diligence framework and mitigate potential risks within its supply chain.

The University has identified broad procurement categories—such as electronics, laboratory supplies, and textiles—as areas that may present elevated risk due to the complexity and global nature of their supply chains. Initial efforts to better understand supply chain risks have included high-level identification of procurement categories and consideration of sector-informed risk indicators. Further work to assess and better understand these risks is anticipated in future reporting periods.

As a public sector organization in Ontario, NOSM University conducts procurement activities in alignment with applicable provincial directives and ethical standards, supporting processes that are open, fair, and transparent.

By prioritizing Ontario suppliers in accordance with the Building Ontario Business Initiative Act (BOBIA) and applicable procurement directives, NOSM University contributes to strengthening local supply chain resiliency while remaining attentive to human rights risk considerations across all procurement activities.

NOSM University continues to monitor evolving provincial procurement legislation, including the recently introduced Buy Ontario Act (Bill 72). While implementation details are still emerging, increased emphasis on domestic procurement may support efforts to reduce exposure to higher-risk global supply chains. The University will continue to assess these developments as part of its ongoing approach to supply chain risk management.

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 bind NOSM University.

X



John P. Stenger
Chair, Board of Governors