



Forced Labor in Canadian Supply Chains

Updated May 28, 2024

Table of Contents

Introduction.....2

1. Structure, Activities and Supply Chain2

2. Policies and Processes in Relation to Forced and Child Labour.....3

 Employee Code of Ethics and Conduct3

 Occupational Health and Safety.....4

 Procurement.....4

 Environmental Policy.....5

3. Identification of Risks6

4. Remediation of Forced and Child Labour.....7

5. Remediation of Loss of Income7

Introduction

This report is Holland College's ("College") response to comply with Section 11 of the Fighting Against Forced Labour and

1. Structure, Activities and Supply Chain

in this statement are Holland College (business number: 107485633), Atlantic Tourism and Hospitality Institute Inc. (business number: 899566764) and PEI Institute of Adult and Community Education (business number: 867257065). As we reference Holland College throughout this report, we are also referencing its two wholly owned subsidiaries

with numerous organizations and institutions and established academic partnerships with the University of Prince Edward Island and other institutions both locally and internationally.

The North American Industry Classification System (NAICS) Canada 2022 Version 1.0 was used to classify the sectors applicable to Holland College's operations, supply chain and related activities.

2. Policies and Processes in Relation to Forced and Child Labour

- (61) Educational services, (611) Educational services, (6113) Colleges, Universities and Professional Schools

Holland College's primary function is to deliver post-secondary education; however, it also operates a bookstore,

[REDACTED]

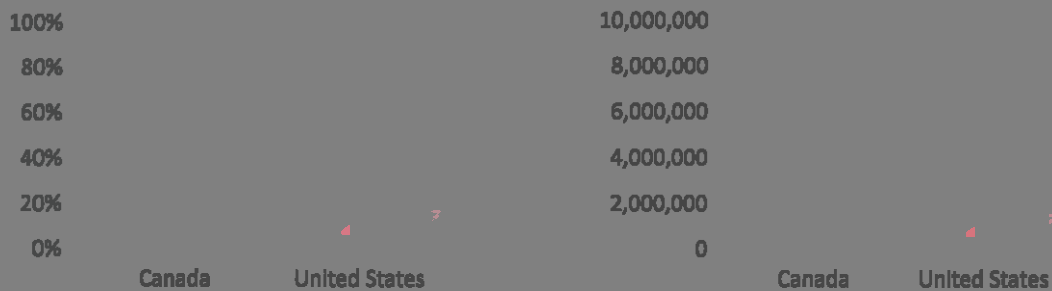
that all activities comply with Canadian legal requirements. In addition, the Code contains an accountability provision

price. While Holland College's Procurement Policy does not mention forced or child labour, it does have provisions designed to limit the use of international suppliers. The Policy contains two relevant provisions in this regard:

- *'the College will patronize local suppliers provided that specifications are met and prices are competitive'; and*

3. Identification of Risks

To understand where in the supply chain forced or child labour risks may exist, Holland College recently carried out a risk assessment process. This process was guided by insights provided by the Walk Free Global Slavery Index (the GSI).



vigilance in this area. The low overall risk does not diminish its commitment to meticulous risk management procedures.

4. Remediation of Forced and Child Labour

For the reporting period, as no incidents of forced or child labor were identified, no remediation of forced or child labour was required.

5. Remediation of Loss of Income

6. Supplier Training

7. Assessing Effectiveness

For the reporting period, Holland College did not have a process for monitoring effectiveness in relation to the use of forced or child labour in its supply chain.

Supplier Status – for Equipment Purchases

A supplier's performance is subject to review at any time. In the event an Executive Director or Manager wishes to

Suppliers designated "Non-Approved" will not be used for a period of at least one year and the use of the supplier after

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

out the parameters within which the policy is to be implemented and provide guidance to staff on how to carry out the policy. Administrative regulations are succinct and clearly outline the parameters in which the College operates.

Administrative regulations may be developed by the Management Executive Committee (MEC) with input from the College community, or staff may develop administrative regulations for consideration and approval of the MEC.


8. Approval and Attestation of the Report

Full Name: Dr. Alexander (Sandy) MacDonald_____

Title: President & CEO

Date: May 29, 2024

Signature:



"I hereby attest to the authority to bind Holland College and its wholly owned subsidiaries"