

University of Lethbridge

Bill S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Annual Report

Issued May 2026

For the fiscal year ending March 31, 2026

Identifying Information

Reporting entity's legal name:	The Governors of the University of Lethbridge
Operating as:	The University of Lethbridge
Financial reporting year:	April 1, 2025 to March 31, 2026
Identification of a revised report:	N/A
Business Number:	119279248
Identification of a joint report:	N/A
Identification of reporting obligations in other jurisdictions:	N/A
Entity categorization according to the Act:	Entity (University)
Sector/industry:	Public Sector / Higher Education
Location:	Lethbridge, Alberta, Canada

Introduction

Founded in 1967 on traditional Blackfoot land, the University of Lethbridge is one of Canada's top-ranked universities and leading research institutions. We are one of Alberta's four comprehensive academic and research universities.

Our motto, Fiat Lux – let there be light – refers to the illumination that comes from research and learning.

The University of Lethbridge's Blackfoot name is Iniskim, meaning Sacred Buffalo Stone. We honour the Blackfoot people and their traditional ways of knowing in caring for this land, as well as all Indigenous Peoples who have helped shape and continue to strengthen our University community.

The University of Lethbridge has more than 7,500 undergraduate students and more than 700 graduate students, with more than 1,600 international students from 90 countries. It is one of Canada's leading research universities with an outstanding record of research achievement. The University's graduates have a 94.8% employment rate and there are over 53,000 Alumni of the University of Lethbridge worldwide.

In this report, we outline information as required under sections 11(1) and 11(3) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"). This includes steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used in the supply of goods into Canada by the University of Lethbridge and discuss future remediation efforts.

Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

With respect to subsection 11(1) of the Act, The University of Lethbridge is in the early stages of taking steps to reduce risks. The University does have policies and plans in place that govern the behaviour of employees and pave a path forward. These include:

- Code of Conduct Policies: Board of Governors & Employees
- Safe Disclosure Policy
- Procurement of Goods and Services Policy
- Supplier & Contractor Ethical Practices Policy
- Investment Management Policy
- Sustainability Plan (2024-2030)
- The department of Supply Chain Operations continues to attend related sustainability webinars dealing with global slavery and ways to minimize the exposure of our supply chain to vulnerable countries.

Supplemental Information

As per subsection 11(3) of the Act, the following seven categories of supplementary information are provided:

1. Reporting Entity, Structure, and Supply Chains

The University of Lethbridge was incorporated under The Universities Act as The Governors of the University of Lethbridge in the Province of Alberta in 1966 by Order In Council 2272/66.

The University is a post-secondary and post-graduate education institution, as well as a leading research institution, that operates in the City of Lethbridge in southern Alberta, Canada. The University also has a secondary campus in the City of Calgary, Alberta.

The University of Lethbridge governs itself with a bi-cameral governance structure, as set out in the Alberta Post-Secondary Learning Act. The Board of Governors has authority for business governance and the General Faculties Council (GFC) has authority for academic governance. The Senate is also defined within the Post-Secondary Learning Act, and it is the duty of a Senate to inquire into any matter that might benefit the university and enhance its position in the community.

The University Secretariat (Governance) Office supports the bi-cameral governance bodies the Board of Governors and General Faculties Council and Statutory Deans' Council (advisory to both) by ensuring the organizational processes are efficient and effective and the institution (students, faculty and staff) and community (through supporting the work of the Senate) are well-informed and prepared to support the Strategic Plan of the University of Lethbridge.

The University of Lethbridge's core business activities include:

- Providing Canada's premier learning experience grounded in liberal education and committed to providing students with small classes, a personal experience, and the most vital and engaging learning environment in the country.
- Commitment to support high impact research across disciplines
- Engaging with our community

In addition to these core activities, the University operates:

- Residence for students
- On-campus food services
- Athletics and recreation facilities and events, including youth camps and programs
- Bookstore, which offers textbooks and course materials, school and art supplies, technology, and a selection of promotional merchandise and apparel.

The University purchases, and in some cases imports, goods to support the administration of academic and student services, research and development, marketing and communications, and facilities management.

Related supply chain activities include:

- goods and services required for university operations (e.g., information technology, office supplies, lab equipment, facilities management),
- bookstore sale of goods (e.g., textbooks and course materials, school and art supplies, promotional merchandise and apparel),
- athletics (e.g., apparel, equipment, and supplies for sports teams),
- student supplies (e.g., lab supplies, classroom supplies, art supplies),
- acquisition of goods for research (e.g. lab supplies, chemicals, and equipment),
- residence providing accommodation to students, and
- on-campus food and beverage services.

2. Policies and Due Diligence Processes

The University has policies and responsible business conduct practices which govern our activities. These include:

- Codes of Conduct Policies for the Board of Governors and Employees:
 - All members of the University's Board of Governors and Employees are expected to behave in a way that reflects a commitment to the University of Lethbridge's values and conduct themselves in a way that upholds the University's integrity and reputation. The University is committed to providing a living, learning and working environment that is free of threats to personal safety and is supportive of productivity, academic achievement, and the dignity, self-esteem and fair treatment of all members of its community
- Safe Disclosure policy
 - The University of Lethbridge is committed to the highest standards of honesty, propriety and integrity in all of its activities. The University encourages members of the University community to discreetly disclose concerns about ethical misconduct and fraud that they observe or encounter in the context of university functions/activities. Employees, students and volunteers are often in the best position to observe or encounter ethical misconduct and fraud because of their proximity to day-to-day University operations. The University relies on these individuals to report such activities in order that it can take prompt corrective action.

- Procurement of Goods and Services Policy
 - The University relies on this policy to create a procurement environment that adheres to legislative requirements, promotes financial stewardship across the University, consideration for fair and transparent processes and manages Procurement Risk for the purchase of all University goods and services, regardless of funding source.
- Supplier & Contractor Ethical Practices Policy
 - The University will not use, nor solicit, philanthropic support, or lack thereof, which benefits the University of Lethbridge or any of its programs in evaluating or determining the award of tenders and selection of Supplies and Contractors for the provision of goods and services to the University of Lethbridge, helping to ensure ethical practices of University suppliers and contractors.
- Investment Management Policy
 - The University's investment philosophy is to guide and inform all investment decisions using a multidimensional portfolio to meet our objectives and specific performance standards. The University incorporates the Alberta Post-secondary Learning Act regulations for investing in our policies and practices. In addition to other factors, this policy notes that Environmental, Social and governance (ESG) factors are becoming an important and developing area for consideration in the context of investments. The Finance Committee will, therefore, emphasize receiving relevant information from its managers respecting which ESG factors, if any, should be considered in the investment decision making process related to the University funds and, if appropriate, how they can be integrated as a relevant risk-mitigating strategy for the University funds. The Finance Committee believes that consideration of ESG factors that may have a financial impact on an investment can enhance long-term investment returns and contribute to the stability of those returns.
- Sustainability Plan
 - The University's Sustainability Plan is an overarching guiding document rather than a policy. It however lays out the commitment and plan to support and enable many communities of University of Lethbridge to uplift our thinking and actions, expand our skills and expertise, and accelerate our work to build sustainability into our daily activities and approaches to our work and learning. Integrating sustainability principles and actions in teaching, research and operations will leverage global movements, resources, and expertise.

3. Business and Supply Chain Risks

The majority of the University's direct suppliers (tier one suppliers) are in Canada or other developed countries including the United Kingdom, United States, and European Union. As a result of tariffs and political climate with US trade, imports from the United States as whole dropped considerably compared to last year, going from supplying 77% of our imports to only 38% this year with United Kingdom at 48% this year.

The World Population Review publishes a Global Slavery Index by country (<https://worldpopulationreview.com/country-rankings/global-slavery-index-by-country>). The University of Lethbridge assesses its modern slavery risk exposure using this index , which scores each country's vulnerability out of 100: Low (0–24), Low-Med (25–49), Med-High (50–74), and High (75–100), and cross-references these scores against our import values by country.

Notably, the United States — typically our largest import source — carries a score of 25, placing it just inside the Low-Med range. This is considerably higher than comparable developed nations such as the UK (14), Germany (11), and Australia (7), driven primarily by structural factors: a large incarcerated population subject to compelled labour, racial inequality, a sizeable undocumented migrant population with limited legal protections, and weaker domestic worker protections.

Reviewing imports from April 2025 to March 2026, our risk exposure is low overall:

- High risk: 0.01% of imports by value
- Med-High risk: 0.83%
- Low-Med risk: 40.56% — of which 38.40% is attributable to the US alone
- Low risk: 58.60%

In practical terms, the US accounts for nearly all of our Low-Med exposure, and given its score of 25 sits at the very threshold of the Low category, over 97% of our imports fall at or near a Low risk rating. It is also noted that the majority of purchases from higher-risk countries are made through third-party vendors who source goods from those countries, rather than through direct procurement.

4. Measures Taken to Remediate Forced Labour or Child Labour

No new measures have been taken in the reporting year. The University has not identified any forced labour or child labour in its activities and supply chains.

5. Measures Taken to Remediate Loss of Income

No new measures have been taken in the reporting year. The University has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains.

6. Training

The department of Supply Chain Operations continues to attend related sustainability webinars dealing with global slavery and ways to minimize the exposure of our supply chain to vulnerable countries. Most webinars attended have been hosted by Supply Chain Canada and Canadian Association of University Business Officers (CAUBO).

Internally we continue to encourage and educate faculty and staff that purchase goods/services using corporate or personal credit cards (expense back) that they be mindful and wary of where these goods/services are coming from.

7. Assessment of Effectiveness

Detailed assessments have not been taken in the reporting year.

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 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.

Deborah Lucas
Vice-President (Finance and Administration)
May 26, 2026



Signature

I have the authority to bind The Governors of the University of Lethbridge