



Board of Governors

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May 31, 2024

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 Forced Labour and Child Labour Report for the College of the North Atlantic. 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 April 1, 2023 – March 31, 2024.

I, Mark Bradbury, Chairperson of CNA Board of Governors have the authority to bind the College of the North Atlantic.

A handwritten signature in black ink, appearing to read 'Mark Bradbury', written over a horizontal line.

Signature

College of the North Atlantic

BILL S-211

**Fighting Against Forced Labor and Child Labor in
Supply Chains Act**

May 31, 2024

Identifying Information

Legal Name: College of the North Atlantic (CNA)

Financial Year End: March 31

Financial Reporting Year: April 1, 2023 – March 31, 2024

Type of Report: Initial – not a revised report

Business Number: 106954019

Joint Report: No

Reporting Obligations in other Jurisdictions: No

Entity Categorization According to the Act:

- Listed on stock exchange in Canada – No
- Canadian business presence
 - CNA has a place of business in Canada
 - CNA does business in Canada
 - CNA has assets in Canada
- Meets size related thresholds
 - CNA has at least \$20 million in assets for a least one of its tow most recent financial years
 - CNA has generated at least \$40 million in revenue for at least one of its two most recent financial years
 - CNA has an average of at least 250 employees for at least one of its two most recent financial years

Sector: Educational Services

Location: Newfoundland and Labrador, Canada

College of the North Atlantic (CNA) is Newfoundland and Labrador's public college with a rich history dating back nearly 60 years. One of the largest post-secondary educational and skills training institutions in Atlantic Canada, CNA operates 17 campuses across the province and offers more than 100 full-time applied degrees, diploma, post-diploma, advanced diploma, and certificate programs in six schools of instruction.

CNA enrolls nearly 7,000 students each year drawn from all areas and from every demographic. Most graduates are successful in finding employment specific to their fields of study, and as such, graduates can pursue rewarding and creative jobs. Graduates of some CNA programs can also earn a degree through partnerships with other institutions.

Steps Taken to Reduce the Risk of Forced Labour or Child Labour

During the reporting year, April 1, 2023 – March 31, 2024, CNA became familiar with the requirements under the Act through:

- read all information available on Government of Canada website
- consulting with the Public Procurement Agency of Newfoundland and Labrador
- attending webinar with KPMG on the Act and reporting requirements
- consulting other provincial government entities
- consulting legal counsel.

CNA is in its initial stages of assessment of its supply chains and risk areas. Completion of this stage will provide CNA with information to formulate steps to reduce the risk of forced labour and child labour.

Structure

CNA was created by virtue of the College's Act, 1996 in the province of Newfoundland and Labrador (NL). CNA is under the leadership of the Department of Education and works collaborative with many other departments including Immigration, Population, Growth and Skills; Health; and Finance.

CNA is governed by a Board of Governors appointed through the Independent Appointments Commission. Subcommittees of the Board of Governors include Finance, Quality, Governance and Executive. CNA is led by a President with the Executive Team made up of Vice President Finance and Administration, Vice President Academic and Applied Research, Associate Vice President of Student Services, Associate Vice President of Human Resources, Associate Vice President of Campus Operations, Associate Vice President Public Affairs and Advancement, Associate Vice President International, and a General Counsel.

The mission of CNA is enriching the learning experience through empowerment and innovation. CNA, as noted in the Information section, has been in operation for 60 years providing post secondary education to Newfoundlanders and Labradorians in the areas of health, business and information technology, engineering, natural resources, trades, academic and applied arts, and, more recently, sustainability. CNA adapts to changing market demands to provide relevant programming to meet growing industry and labor demands. While most students at CNA are from Newfoundland and Labrador, CNA also attracts students from across Canada and internationally.

In the fiscal reporting year ending March 31, 2024, CNA had 1374 employees in Canada. CNA does not have a place of business outside of Canada but is involved in development projects in countries where existing staff travel to work from time to time as part of project deliverables.

To perform its mission, CNA collaborates with many partner organizations within NL and Canada. These partner organizations are not subsidiaries of or controlled by CNA and their performance is not consolidated in CNA's annual financial reporting.

Activities

As an educational institution, CNA's mandate and role are not to produce, manufacture, grow, extract, or process goods for sale or distribution in or outside of Canada. CNA purchases goods to support the learning environment and its activities. CNA operates residences and cafeterias at a number of its campuses, and bookstores. There are purchases for goods and services made with suppliers outside of Canada. The majority of these goods are imported to CNA into Canada and go through a custom broker for assessment of duties and taxes. A very small portion of goods and services are purchased in a country outside of Canada and are in support of development projects undertaken with various partners including Colleges and Institutes Canada (CICAN) and Global Affairs Canada.

From the review of purchasing activity for fiscal year ending March 31, 2024, goods were purchased from Australia, Barbados, China, France, Germany, Guyana, Hungary, Iceland, Jamaica, Kenya, Netherlands, Norway, Slovakia, Switzerland, United Kingdom, and the United States. While there have been several countries identified, it should be noted that purchases from the United States account for 88.25% of the total purchases for the fiscal year identified. Examples of items purchased include textbooks, computer and related equipment, software, aviation parts, and medical equipment and testing supplies. Purchases in other countries outside of the United States include software, textbooks, and accommodations/meeting rooms.

CNA operates solely in Canada. As noted previously, CNA does partner with various organizations and governments on development projects. To meet deliverables for these projects, travel can occur to the country by staff of CNA. In some cases, as part of the deliverables, CNA may purchase goods/assets to support the work being completed in the country for which the development project is based.

Supply Chain

Purchasing for CNA is governed by the Public Procurement Act (PPA) NL and its associated regulations and policy under the province of Newfoundland and Labrador. CNA does not produce goods for resale. CNA purchases items to be used for the learning environment and its related functions. CNA operates a bookstore for the sale of textbooks and some educational supplies to students. Cafeteria and residences are also operated in a number of campus locations.

CNA has a Purchasing Department led by a Procurement and Bookstore Manager. There is a Procurement Officer III responsible for request for proposals and open calls/tenders. To round out the department, there are four (4) buyers responsible for purchases requiring solicitations of quotes and one (1) buyer who is responsible for creating purchase orders from negotiated agreements.

A supply chain for CNA is limited to the purchase of goods and services of suppliers. The PPA requires that CNA purchase goods and services through a solicitation of quotes from supplier, request for proposals, and tenders. All request for proposals and tenders are advertised on MERX which ties into the Federal Government systems to meet various trade agreements.

Policies and Due Diligence Processes

CNA currently does not have any policies and due diligence processes in place related to forced labour and/or child labour. CNA does have a Strategic Plan 2023-2026 focusing on:

- Equity, Diversity and Inclusion
- Advance Teaching and Learning Approaches
- Sustainable Development and Growth.

Imbedded throughout this plan are several Sustainable Development Goals as identified by the United Nations.

CNA has a system of internal controls and many policies and procedures providing guidance on significant business processes. These are regularly reviewed.

As CNA continues to learn more about this legislation and risks within its supply chain, policies and procedures can be updated to provide guidance to staff and CNAs purchasing department.

Forced Labour and Child Labour Risks

Assessing risk in CNAs supply chain has begun through the review of purchases made from outside of Canada. The process of assessing risk will be continuous. Based on the initial assessment, risk have been identified in the area where some of our development project activities occur. In these projects, activities will occur in country and CNA purchases accommodations and meals. Some projects will also include equipment/asset purchases which may occur in country as well.

CNA will begin working with our partners to discuss the potential risk and how we together can continue to assess, manage and reduce this risk.

Remediation Measures

CNA has not taken any remediation measures.

Remediation of Loss of Income

CNA has not taken any remediation measures related to loss income.

Training

CNA has not established any training programs on forced labour and/or child labour. As CNA continues its assessment of its supply chain, it will also assess the level of training that may be required and to which target groups.

Assessing Effectiveness

No actions have been taken by CNA to assess the effectiveness of preventing/reducing forced labour and/or child labour in its supply chain. However, CNA has a LEAN Management Program and reviews business processes regularly with a continuous improvement lens.