

Fighting Against Forced Labour and Child Labour in Supply Chains

Updated May 2026

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1. Introduction

This report is Holland College's ("College") response to comply with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("the Act") for the financial year ending March 31, 2026.

Holland College is a body corporate established by the Holland College Act and is obligated to submit a report to the Minister of Public Safety and provide a public report by May 31, 2026.

The reporting entities covered 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.

Holland College operates in the following sector, sub-sector, and related industry group:

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

Holland College meets the Entity definition of the Act as it has a place of business in Canada, does business in Canada, has assets in Canada and meets the threshold for revenue, assets, and employees. Holland College also meets the definition of Reporting Entity as it imports goods produced outside of Canada.

This report addresses the mandatory reporting elements set out under Section 11 of the Act, including the College's structure, supply chain activities, policies and processes, risk identification, remediation measures, training, and approaches to assessing effectiveness.

2. Structure, Activities and Supply Chain

Holland College is Prince Edward Island's community college, established in 1969, with a mandate to provide applied post-secondary education, vocational training, and adult learning programs. The College operates across multiple campuses within the province and is governed by a Board of Governors.

The College employs approximately 800 individuals and conducts its operations primarily within Canada, with limited international activities related to program delivery and academic partnerships.

Holland College's supply chain supports its educational and operational activities and includes the procurement of:

- Educational materials and training supplies
- Food and beverage products
- Retail goods for resale
- General operational and administrative supplies
- Equipment and specialized program-related goods

The supply chain includes approximately 1,000 vendors located primarily in Canada and the United States. While a significant portion of suppliers are domestic, the College recognizes that risks of forced and child labour may arise in any jurisdiction and may occur at various tiers of the supply chain, particularly where goods are produced through complex or international supply chains.

The College's procurement activities are largely decentralized across operational units, with oversight and governance provided through centralized procurement policies and processes. Procurement risk exposure is generally indirect and associated with the sourcing of goods rather than owned or controlled manufacturing.

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

Holland College has several policies, regulations, processes, and procedures that govern its relationships with suppliers and establish expected behaviour and professional conduct of its employees.

Employee Code of Ethics and Conduct

Holland College maintains an Employee Code of Ethics and Conduct that outlines expectations relating to ethical behaviour, professionalism, legal compliance, and institutional accountability. While the Code was not originally developed specifically for forced and child labour due diligence, it supports the College's broader governance framework and expectations relating to responsible conduct within procurement, supplier engagement, and international activities.

Occupational Health and Safety

Holland College maintains occupational health and safety policies and procedures intended to support safe and respectful working environments across its operations. While these measures are primarily internally focused, they contribute to the College's broader governance framework supporting worker wellbeing, responsible operational practices, and principles consistent with the objectives of the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

These measures align with broader principles reflected within international and Canadian guidance frameworks, including the OECD Due Diligence Guidance for Responsible Business Conduct, the United Nations Guiding Principles on Business and Human Rights, and applicable Canadian occupational health, safety, employment, and human rights legislation, which collectively emphasize the importance of worker protection, responsible organizational conduct, and the identification and mitigation of labour-related risks.

Procurement

Holland College's Procurement function is responsible for implementing purchasing policies, procedures, and controls that govern the acquisition of goods and services across the College. Governance and oversight of procurement activities are provided through established policies, delegated authorities, and approval processes, with accountability resting with senior leadership and operational responsibility distributed across functional areas.

The College maintains centralized procurement policies that define requirements related to purchasing approvals, supplier engagement, contracting practices, and financial controls. Only authorized individuals may commit the College to procurement arrangements, ensuring consistency and accountability in purchasing decisions.

In 2025, the College added a provision to the Policy to formalize our commitment to the prevention of forced and child labour in global supply chains, and to reinforce our expectation that suppliers meet these requirements:

- *“The College is committed to implementing reasonable due diligence measures intended to identify, assess, and mitigate the risk of forced and child labour within its operations and supply chains. All suppliers, regardless of origin, are expected to adhere to applicable Canadian employment standards, labour, non-discrimination, and human rights legislation.”*

The College recognizes that supply-chain due diligence is an evolving process and continues to strengthen procurement-related governance and supplier engagement

practices through a risk-based and continuous improvement approach. Where operationally appropriate, these efforts may also align with broader responsible sourcing and sustainability considerations reflected within existing College procurement and governance practices.

Quality Policy

As part of meeting its vision (“Inspiring Today. Creating Tomorrow”), mission (“empowering diverse, student-focused learning, strengthening communities and supporting future prosperity”) and values (innovation, applied learning, inclusion, engagement, environmental responsibility, and inspiration), Holland College has adopted a structured quality program that satisfies requirements outlined in ISO 9001:2015.

This ensures that College processes are designed and implemented to address risk and opportunities and ensures the College environment is a place where improvement initiatives are encouraged and welcomed. Furthermore, it ensures that measurable and realistic quality objectives are established annually, communicated to all staff and are evaluated, reviewed and revised (as needed) on an ongoing basis.

4. Identification of Risk

To better understand where potential forced and child labour risks may exist within its operations and supply chains, Holland College conducted a risk assessment process informed by publicly available guidance and reporting resources, including the OECD Due Diligence Guidance for Responsible Business Conduct, Public Safety Canada guidance relating to the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and the United States Department of Labor’s List of Goods Produced by Child Labor or Forced Labor.

The College recognizes that forced and child labour risks may arise through both domestic and international supply chains and acknowledges that no sector or jurisdiction is entirely exempt from potential labour-related vulnerabilities. Accordingly, the College’s risk assessment considered a combination of geographic, sector-specific, procurement-category, and supply-chain risk factors.

Particular consideration was given to procurement categories and sectors that may present elevated inherent risk due to the nature of the goods, labour models, manufacturing activities, or upstream supply-chain characteristics involved. These sectors may include apparel, imported goods, seafood, agriculture, and certain products originating from or processed through complex international supply chains.

Risk Assessment Findings

Holland College recognizes that certain Canadian sectors, including agriculture, seafood processing, and other labour-intensive industries, may present increased vulnerability relating to temporary foreign worker reliance, subcontracted labour, or broader labour exploitation concerns identified within public reporting and regulatory enforcement actions.

While the College's current assessment indicates that overall exposure to forced and child labour risk is currently considered relatively limited in relation to overall expenditures and operational activities, the College recognizes the importance of ongoing vigilance, continuous improvement, and progressively enhanced supply-chain due diligence measures.

5. Remediation of Forced and Child Labour

Based on the College's current due diligence processes, no instances of forced or child labour were identified during the reporting period. However, the College recognizes that limitations are inherent in supply chain visibility and continues to strengthen its processes for identifying and addressing potential risks. No remediation of forced and child labour was required.

6. Remediation of Loss of Income

Based on the College's current due diligence processes, no instances requiring remediation of loss of income were identified during the reporting period.

7. Employee Training

To strengthen internal awareness and governance capacity, members of the Procurement Department and the Chief Financial Officer are scheduled to receive training during the first quarter of the 2026–2027 reporting period related to forced and child labour risks, supply-chain due diligence, and reporting obligations under the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

As part of its ongoing continuous improvement approach, Holland College is implementing a tiered and risk-based training model intended to progressively expand awareness and operational understanding within functions with greater procurement and supply-chain exposure. The College plans to extend training to employees involved in purchasing, vendor selection, contract management, food services, bookstore operations, and other operational functions with direct supply-chain or procurement-related responsibilities.

The College also intends to extend awareness and governance-related training to senior leadership and management functions during the second half of the 2026–2027 reporting period in support of broader organizational oversight and responsible supply-chain governance practices.

In addition, the College has commenced development of a Supplier Due Diligence Questionnaire and supplier awareness process for higher-risk suppliers and procurement categories. This process is expected to include the use of a short informational and training resource, accessible through QR code technology, outlining the College’s expectations relating to ethical sourcing, forced and child labour awareness, and applicable supplier responsibilities.

Initial implementation efforts will prioritize procurement categories and sectors considered to present elevated inherent risk, including but not limited to seafood, agriculture, apparel, and imported goods.

8. Assessing Effectiveness

As the College’s supply-chain due diligence processes continue to evolve, formal mechanisms for assessing the effectiveness of forced and child labour risk mitigation measures remain under development. However, the College has commenced implementation activities, including procurement-related training and the development of supplier due diligence measures, intended to strengthen future monitoring, governance capacity, and continuous improvement efforts.

Initial indicators that may be used to assess effectiveness include:

- Percentage of relevant employees completing training
- Number of suppliers assessed through due diligence tools
- Level of integration of labour-risk considerations into procurement processes

These indicators are expected to support ongoing monitoring and continuous improvement.

9. Approval and Attestation of the Report

In accordance with the requirements of the Act, and in particular Section 11, 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 due 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.

Full Name: Alexander Sandy Macdonald.

Title: President

Date: May 29/26

Signature: Alexander Macdonald

"I have the authority to bind Holland College and its wholly owned subsidiaries."