



The City of Calgary

Bill S-211, Fighting Against Forced Labour and Child Labour in Supply Chains Act

Entity Report - financial year 2024

May 31, 2025

Land Acknowledgement

The City of Calgary, where the Bow and Elbow rivers meet, was historically a place of confluence where the sharing of resources, ideas and opportunities naturally come together. Long before Scottish settlers named it Calgary, the original Indigenous Nations of this area had their own names for the land. In the Blackfoot language, it is called Moh-kins-tsis (moh-GIN'-stis (a soft 'g')). The Îethka Nakoda Wicastabi (ee-YETH'-kah nah-COH'-dah WHISK'-ah-tah-bay) First Nations refer this place as Wicispa Oyade (weh-CHIS'-spa oh-YAH'-day) and the people of the Tsuut'ina (Soot'tenna) nation call it Guts-ists-I (GOOT'-sis). The Métis call the Calgary area Otos-kwunee (oh-TUSS' - kwanee).

We would like to take this opportunity to appreciate and acknowledge that we are gathered on the ancestral and traditional territory of the Blackfoot Confederacy, made up of the Siksika (Seeg-see-kah), Piikani (Bee-gun-nee), Amskaapiikani (Om-Skaa-bee-bee-Gun-nee) and Kainai (G-ai-nah) First Nations; the Îethka Nakoda Wicastabi (ee-YETH'-kah nah-COH'-dah WHISK'-ah-tah-bay) First Nations, comprised of the Chiniki (Chin-ick-ee), Bearspaw, and Goodstoney First Nations; and the Tsuut'ina First Nation. The city of Calgary is also homeland to the historic Northwest Métis and to the Otipemisiwak (Oti-pe-MES-se-wa) Métis Government, Métis Nation Battle River Territory (Nose Hill Métis District 5 and Elbow Métis District 6). We acknowledge all Indigenous people who have made Calgary their home.

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Introduction

Summary

[Bill S-211](#) (short title: Fighting Against Forced Labour and Child Labour in Supply Chains Act), was introduced in the [Senate](#) by the Honourable Julie Miville-Dechéne. The bill received Royal Assent on May 11, 2023, and came into force on January 1, 2024.

This Act enacts the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“the Act”), which puts an obligation on certain government institutions and private-sector entities to report on the measures taken to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains. The bill requires these reports to be public and proposes fines for entities that make false or misleading statements in their reports.

The following definitions apply in this Act:

- [Child labour](#) means labour or services provided or offered to be provided by persons under the age of 18 years and that:
 - (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
 - (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
 - (c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
 - (d) constitute the worst forms of child labour as defined in article 3 of the [Worst Forms of Child Labour Convention, 1999](#), adopted at Geneva on June 17, 1999. (travail des enfants).
- [Forced labour](#) means labour or service provided or offered to be provided by a person under circumstances that:

- (a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or
- (b) constitute forced or compulsory labour as defined in article 2 of the [Forced Labour Convention, 1930](#), adopted in Geneva on June 28, 1930. (travail forcé).

This document details performance measures and steps [The City of Calgary](#) (“The City” or “Calgary”) as an [Entity](#) has taken during its 2024 financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by The City, or of goods imported into Canada by The City.

Our Organization

A great city needs a collaborative vision, and a great public service needs a collective commitment. We are strategically aligned to execute as one and deliver successful outcomes for residents, businesses, and employees. Ranked as the fifth most livable city in the world by The Economist in 2024. We are proud to be an amazing place to make a living and to make a life.

Our Vision:

Calgary: a great place to make a living,
a great place to make a life.

Our Purpose:

Making life better every day.

Our Shared Values:

Our shared values provide a basis to help us to make decisions and guide our actions. They give us a clear idea of what we need to do to be successful, both individually and collectively.

Our Culture - The 4 Cs:

Competence, Character, Commitment & Collaboration. The 4 Cs are the essential behaviours of our organization.

Resilient Calgary:

Council's Strategic Direction provides the foundation, guiding principles and focus areas needed for Administration to create service plans and budgets for the next four years.

The City's Supply Management business unit uses a strategic approach to ensure Calgarians get the best value for public funds spent by planning for and obtaining the goods and services The City needs.

Supply Management is part of the Procurement & Warehousing service, which offers procurement, inventory, and warehouse services to deliver the best value for public funds and promote trust in

The City. Our service stewards The City's supply chain activities through the purchase of construction, consulting, information technology, inventory, goods, and services; planning, forecasting, inventory control, distribution, and end-of-life disposal of Corporate Inventory.

We facilitate corporate adherence to legislation and regulatory requirements and form contracts between suppliers and The City as delegated under the Bylaw 43M99 Execution of Agreements, while enabling social procurement and contract compliance.

Provincial and municipal government institutions are not subject to Bill S-211's reporting requirements according to the definition of "government institutions" in the Act. However, The City meets the definition of "[Entity](#)" and thus supports Canada's international commitment to contribute to the fight against modern slavery.

Components of the report

The City of Calgary is the third largest municipality in Canada, serving 1.5 million people. We listen, respect and act. Under the provisions of the Bill, the Reporting Obligation applies to The City for:

- (a) producing, selling, or distributing goods in Canada or elsewhere
- (b) importing into Canada, goods produced outside Canada

For the purposes of this report, below is the identifying information about The City:

Reporting entity's legal name	The City of Calgary
Financial reporting year	2024
Identification of a revised report	Initial
Business number(s), if applicable	Registered as a municipality with the government of Alberta, as classified under the Municipal Government Act ("MGA")
Identification of a joint report	None
Identification of reporting obligations in other jurisdictions	None
Entity categorization according to the Act	Corporation
Sector/industry	Municipal government
Location	Calgary, Alberta, Canada



Figure: Calgary Municipal Building

Steps taken to increase transparency in our supply chains in the 2024 financial year

In the past fiscal year, The City has taken several steps to mitigate risks in our goods production and import processes, both domestically and internationally, through its Supply Chain Resilience program. This program provides visibility between City contracts and the underlying commodities that make up the work, along with their associated risks. It uses supply chain mapping to proactively identify and manage potential disruptions, such as natural disasters or market volatility, thereby ensuring supply chain resilience. This approach ensures a consistent supply of goods and services and the framework focuses on four critical steps: preparing, monitoring, responding, and evaluating. Although this program does not explicitly incorporate considerations related to forced labour and child labour in its commodity review process, it does align to and support The City's Supplier Code of Conduct policy.

Steps to prevent and reduce risks of forced labour and child labour

The City makes thousands of procurements each year to deliver the services Calgarians depend on every day. The Supply Management team ensures that The City receives the best value for the public funds that are spent and that all purchasing takes place in an open, fair, and transparent manner that is compliant with the law governing public procurement in Canada.

The City's Procurement policies, practices, and strategies guide the purchase of construction, consulting, goods and services, and information technology with public funds to enable the delivery of public services. As a municipal government in Canada, the law governing public procurement requires The City and its employees to maintain the integrity of The City's procurement processes and activities.

Further details regarding The City's internal and external governance framework are available below:

(a) Structure, activities, and supply chains

The Municipal Government Act (“MGA”) empowers municipalities to shape their communities and regulates how municipalities are funded and how, as local governments, they should govern and plan for growth.

City Council is the main governing and legislative body for The City of Calgary and consists of the [Mayor and 14 City Councillors](#), one representing each of Calgary's 14 Wards. [City Council](#) is responsible for making the decisions necessary to allow The City as a Corporation to achieve its purposes by determining goals and priorities, developing, and approving policies, raising and spending money, planning and providing services and programs and representing the municipality.

Enacted pursuant to the MGA, Bylaw 52M2022 establishes the position of Chief Administrative Officer of The City, with all the powers, duties, and functions of that position given by the Act, or any other enactment, or by City Council.

Under Bylaw 43M99, all contracts and documents authorized by the Council or other legal enactments can be executed with the signature of the City Clerk and the Chief Administrative Officer, or their delegates. However, the Chief Administrative Officer also has the discretion to authorize agreements on behalf of The City without the need for the City Clerk's execution or the corporate seal.

The [Executive Leadership Team](#) (ELT) is the most senior group of administrative officials in the organization. The ELT ensures that the actions and directions of management support the corporate vision and strategies. Our [Chief Administrative Officer](#) (“CAO”) reports to City Council and ensures that the Corporation supports the Mayor and Councillors and delivers on Council's agenda and priorities. The CAO directs the Corporation to deliver quality public services for all Calgarians.

Our culture, leadership, services, and corporate strategy demonstrates who we are as an organization. Our common purpose and shared values are key to helping us make life better every day for our colleagues and citizens. The City supports a safe and respectful work environment with an employment of 16,964 City Staff as of December 31, 2024.

The City's Supply Management business unit leads the Procurement and Warehousing service line, providing procurement, inventory and warehouse services that deliver the best value for public funds and promotes trust in The City.

For the purposes of the Act, The City's supply chain includes sourcing raw materials to final products from direct and indirect suppliers and service providers, both in Canada and outside Canada. This includes the manufacturing and wholesale trades that contribute to the production of goods produced, sold, distributed, or imported by The City. Our supply chain does not include the end users or customers who procure its products or services.

(b) Policies and due diligence processes

In Canada, the law governing public procurement is informed by several categories of legal rules: (A) common law (judge-made law); (B) international and domestic trade agreements, (C) statutes and regulations; and (D) The City's Administration Policies including but not limited to Procurement Policy and Supplier Code of Conduct Policy, Procurement Practices, Procurement Governance Framework and Procedures, City bylaws, Delegation of Authority, and Council Policies. The City and its employees, consultants, and suppliers are subject to these governing rules.

Our policies and due diligence processes meet the requirements of The City's economic, social, climate and environmental, and governance initiatives. Our standard conditions mandate that our suppliers comply with all relevant laws and

legislations. Additionally, we undertake further due diligence measures, which include qualitative evaluations in the public procurement process.

We are committed to continuous improvement and ongoing risk assessment. Furthermore, we strive to work with suppliers who maintain the highest integrity standards.

The City has implemented robust procurement practices and processes to enable our employees to assess and mitigate risks. This is achieved by adhering to the internal governance documents outlined below:

Procurement Policy

The City's Procurement Practices, and Procurement Governance Framework informs the City's Procurement Policy – which has been in effect since May 1, 2021. The Procurement Policy outlines the principles that govern procurement, and provides all persons covered by this Policy with an understanding of the legal requirements and practices to protect the interests of The City in the delivery of public services. All City procurement is based on the six overarching procurement principles, known as the "FACTOE" (Fairness, Accountability, Competition, Transparency, Openness, and Ethics) principles that guide all procurement decisions and actions. A City procurement contract, including its relationship with a Supplier, must be managed, throughout its life cycle, in accordance with its terms, conditions and deliverables.

Procurement Practices

The City's Procurement Practices supports the Procurement Policy and guides individuals undertaking procurement activities, regardless of value, covered under the Procurement Policy, while complying with applicable external and internal governance requirements. These Procurement practices are a foundational resource for employees, consultants, or contractors at The City – who are all subject to the law governing public procurement, trade

agreements, City bylaws, procurement delegation of authority, and Council and Administration policies. Calgarians expect The City to maintain the integrity of The City's procurement activities.

Procurement Governance Framework

The Procurement Governance Framework applies to The City's procurements covered under the Procurement Policy using public funds, for competitive or non-competitive procurements, all payment forms (e.g., purchase order, non-purchase order, or credit card), and all categories of procurement (construction, consulting, goods and services, and information technology), where the total procurement value meets or exceeds Trade Agreement Thresholds. The City's Procurement Governance Framework supports the Procurement Policy and guides individuals undertaking procurement activities covered under the Procurement Policy to successfully facilitate and meet procurement needs while complying with applicable external and internal governance requirements. This Procurement Governance Framework is a foundational resource for employees, suppliers (consultants or contractors) at The City. It also establishes common expectations to help develop a Corporate-wide understanding of procurement covered by the Procurement Policy.

Public Value through Procurement Policy

The Public Value through Procurement Policy provides guidance on strategic and intentional investment through procurement activities towards economic, socio-cultural, and environmental outcomes for Calgarians. The City requires its employees and agents, including consultants and contractors, to act with the highest ethical standards and maintain the integrity of The City's procurement.

Social Procurement

[Social Procurement](#) defines how City Administration performs procurement activities under the Procurement Policy for building inclusive, resilient, and sustainable trade within our supply chain. Social Procurement is when The City makes strategic procurements to contribute to social equity, economic resilience, social and economic reconciliation with Indigenous people, and growing a green economy. If a business meets the requirements for price and quality, its ability to receive additional evaluation points in the environmental, social, economic and governance categories through the [Social Procurement Questionnaire](#) could provide the advantage needed to win a competitive bid.

Supplier Code of Conduct Policy

The Supplier Code of Conduct Policy sets out the principles applicable to any supplier that wishes to establish and maintain a business relationship with The City. By promoting these principles and applying measures to encourage compliance, The City is confirming its intention to do business with suppliers that can demonstrate solid business integrity that aligns with The City's corporate values and behaviours.

Section 5.1 of The City's Supplier Code of Conduct Policy states that "Suppliers to The City shall abide by all applicable federal, provincial, and local laws, and regulations in conducting their business."

In addition to the policy, Supplier's obligations are set out in the contractual agreements and [Terms and Conditions](#) between The City and the Supplier.

All bidders on City procurements are required to sign the Procurement Document Submission Form whereby they confirm compliance with the Supplier Code of Conduct and other requirements.

(c) Forced labour and child labour risks

The City emphasizes the significance of the new bill and our responsibilities as an entity. As set out in the Supplier Code of Conduct, suppliers to The City commit to abide by all applicable federal, provincial, and local laws; and regulations in conducting their business, thereby demonstrating strong business integrity that aligns with The City's corporate values and behaviours.

(d) Remediation measures

The City maintains its relationship with the suppliers from identification, selection, on-boarding, performance management, information management, risk management, relationship management, to off boarding, and possible disqualification and debarment where justified. Our debarment process, which is not currently tailored to address the risks of forced labour or child labour, would be activated to take remedial action should such issues be identified within our supply chain. In line with our supplier code of conduct and contract terms and conditions, we would implement measures to rectify the situation, which could extend to contract termination, debarment, and reporting to the appropriate authorities. The City offers several accountability programs to Calgarians, including the Whistle-blower Program for reporting concerns related to suspected waste or wrongdoing, The City Auditor's Office which is responsible for auditing and reporting processes, and 311 Calgary for City government information and non-emergency services. As a result of these activities, any findings will undergo review and appropriate action.

(e) Remediation of loss of income

As indicated earlier, The City manages its relationship with the suppliers through various stages, from identification to potential disqualification, without specifically focusing on the risk of forced labour or child labour. Consequently, no specific steps have been taken

to address these issues in our activities and supply chains.

(f) Training

The City has provided training on the Procurement Policy, Practices and Procurement Governance Framework to all employees and Council involved in procurement. ~~There has been no training specifically related to forced labour or child labour.~~

Bill S-211 Awareness Training Initiatives

To strengthen compliance with Bill S-211, The City of Calgary conducted an awareness training session for business strategists within Supply Management along with selected leaders and managers. The training provided an overview of Bill S-211, its importance, the role of The City of Calgary, and the role of Supply Management. Business strategists from diverse portfolios attended, including those from Employee & Customer Experience, Public Value, Procurement Planning & Contract Management, Instructional

Design, and Strategic Annual Planning. These professionals play critical roles in The City of Calgary's procurement process. The training emphasized the importance of transparency, identification, and reporting to mitigate the risks of forced and child labour in The City's supply chains.

(g) Assessing effectiveness

The City acknowledges the complexity and challenges associated with assessing the effectiveness of measures designed to address risks, including forced labour and child labour, in our operations and supply chains. However, as of now, there have been no instances of forced labour or child labour risks identified in our risk register. The City continues to focus on delivering services to Calgarians while monitoring and managing risks to avoid undesirable impacts. Currently, The City's risk evaluation and performance monitoring includes external feedback from sources including 311 Calgary, the Whistle-blower Program and conducting surveys with both customers and suppliers.

Process Overview

Consequences of Non-Compliance

The City's procurement practices and activities clearly define the obligations related to adherence to procurement principles and compliance requirements. We remain dedicated in our commitment to uphold the highest standards of business and commercial conduct and treat any violations of the Supplier Code of Conduct with utmost seriousness. The City will conduct investigations into any alleged improper activities by suppliers, ensuring that all information reported, as well as information disclosed during investigation, is classified as confidential information.

Associated Procedures and Standards

The City's policies and evidence of processes can be found below:

- [Procurement Policy](#) (Report Number: ALT2019-1469, Effective Date: May 1, 2021)
- Procurement Practices (internal governance document)
- Procurement Governance Framework (internal governance document)
- [Public Value through Procurement Policy](#)
- [Social Procurement Program](#)

- [Supplier Code of Conduct Policy](#) (Report Number: ALT2020-1056, Effective Date: September 28, 2020)
- [Employee Code of Conduct Policy](#)
- Whistle blowing: Any contractor, supplier, or member of the public can be report violations of the Code of Conduct with intent to cause harm to The City, or any other allegation of suspected wrongdoing, through The City's [Whistle-blower Program](#) Site.
- City Auditor's Office: City [Auditor's](#) Office is responsible for providing independent and objective assurance, advisory and investigative services to add value to The City and enhance public trust.
- [311](#) Calgary: This is The City's Citizen Services division which assists Calgarians with questions and/or requests specific to The City's services or information.
- A public supplier list: The [Alberta Purchasing Connection](#) ("APC") is Alberta's official electronic tendering system. It is used to advertise and distribute solicitation documents from the [Government of Alberta](#) and other public sector organizations, such as the MASH sector, without cost to suppliers, vendors or purchasers.
- Programs and services: Awareness for various [Social programs and services](#) .

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 'The City of Calgary.'



David Duckworth, P.Eng., MBA
Chief Administrative Officer, The City of Calgary

April 2, 2025

Date

Revision History

Revision Number	Completed by	Revision Date	Revision Description/Comments
V2.0	Business Excellence, Supply Management	May 31, 2025	2024 submission
V1.0	Business Excellence, Supply Management	May 31, 2024	initial release

Contact: Questions related to this report should be directed to [Office of the Director, Supply Management](#), The City of Calgary.