

## Fighting Against Forced Labour and Child Labour in Supply Chains Act

### Introduction

Almonte General Hospital (the “Hospital”) has determined itself to be a Reporting Entity as outlined in Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). The Hospital is classified as an entity because the organization meets the following criteria:

- Canadian business presence
  - Has a place of business in Canada;
  - Does business in Canada; and
  - Has assets in Canada.
- Size-related threshold
  - Has at least \$20 million in assets for at least one of its two most recent financial years;
  - Has generated at least \$40 million in revenue for at least one of its two most recent financial years; and
  - Employs an average of at least 250 employees for at least one of its two most recent financial years.

The Hospital is classified as a Reporting Entity because it meets the following criteria:

- Sells goods in Canada; and
- Imports goods into Canada that are produced outside of Canada.

Almonte General Hospital is a corporation that conducts its business in Almonte, Ontario, Canada, is in the healthcare and social assistance industry, and its business number is 118784214 RT0001. The Hospital is completing this Report for only itself and is not representing any other Entity.

This report will be covering the fiscal year of 2023-2024 (April 1, 2023 to March 31, 2024). It will only include measures and steps taken by the organization during this timeframe. This is the first and final version of this Report.

### Organizational Background *(its structure, activities, and supply chains)*

Almonte General Hospital is a provincially funded, not-for-profit organization located in the town of Almonte. The Hospital is a registered charity under the Income Tax Act. The Hospital is a patient and family-centered, rural community hospital where the patient/resident and their family come first.

The Almonte General Hospital Corporation includes 3 Divisions operating on 5 sites located in Almonte, Carleton Place, Lanark, Perth and Smiths Falls. The 3 Divisions include the Almonte General Hospital, the Fairview Manor Long Term Care Home and the Lanark County Paramedic Service.



The Almonte General Hospital has been providing excellent medical care to the residents of Almonte, Arnprior, Carleton Place, the City of Ottawa and surrounding townships for generations. The Hospital's dedicated and highly trained doctors and nurses, modern facilities and smaller size combine state-of-the-art services with the personal care and attention that define small community hospitals in Ontario. The 52-bed Hospital provides an extensive range of services, including 24-hour emergency services and the Region's Obstetrical Care, Complex Continuing Care and Day Hospital programs.

The Fairview Manor is a 112-bed long-term care Organization that is attached to the Hospital. Fairview Manor is divided into 4 home areas and offers programs within a long-term care environment that respect residents' individuality, dignity, privacy and personal choice, while meeting their physical, functional, psychosocial and cognitive needs.

The Lanark County Paramedic Service is the sole service provider for ambulance and paramedic services within the County of Lanark, and provides 24-hour pre-hospital emergency and non-emergency care and transportation to and between hospitals for individuals experiencing injury or illness. Bases are located in Carleton Place, Almonte, Lanark, Perth and Smiths Falls.

Almonte General Hospital must adhere to the Ontario Broader Public Sector Procurement Directives, The Canadian Free Trade Agreement, the Canadian Economic Trade Agreement, and the Canada-US-Mexico Agreement. The Hospital procures goods, and services independently as well as through Group Purchasing Organizations (GPO) and Shared Services Organizations (SSO).

**Prevention Efforts** *(the steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods produced, purchased, or distributed by the government institution)*

Since the implementation of the Act, Almonte General Hospital has required its suppliers to attest to adhering to the Act when submitting bids to its publicly posted tenders, such as RFP etc. (The RFP process in 2023/24 was hosted by Mohawk Medbuy. All Group Purchasing Organizations (GPOs) and Shared Service Organizations (SSOs) of which the Hospital affiliates, are also complying with the Act's requirements for their sourcing and procurement activities.

The hospital has been reviewing supply chain ethics commitments made by suppliers, to ensure their supply chains are free of forced labour and child labour. This review will continue into the next fiscal year and thereafter to ensure that the hospital's suppliers meet their requirements with respect to forced labour and child labour.

For the 2024/2025 fiscal year, the hospital will create stricter agreement clauses outlining the necessity of the Act and require reporting from suppliers on the steps they are taking to ensure their supply chains are free of forced labour and child labour.

**Policies and Due Diligences** *(its policies and due diligence processes in relation to forced labour and child labour)*

As of the end of the 2023-2024 fiscal year, Almonte General Hospital did not have any policies or due diligence relating to forced labour and child labour.

Policies and due diligences will be put in place for the upcoming 2024/2025 fiscal year. The Hospital plans to update its procurement policy and require all publicly posted tenders to stipulate that suppliers must report on their forced labour and child labour policies, and articulate if their supply chains are at risk of propagating forced labour or child labour.

**Risk Assessment** *(the parts of its activities and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk)*

Almonte General Hospital has identified the need to begin a process of identifying risks and this work will be ongoing. To date, no gaps or specific risks have yet been identified. The Hospital will continue to work on identifying the risks of forced labour and child labour in supply chains and determine the best way to manage and mitigate those risks. Almonte General Hospital will continue to work with other regional hospitals to continue to identify risks associated with common suppliers.

As the Hospital operates in Ontario, there are no risks of forced or child labour within the organization, however there are risks of forced labour and child labour with the suppliers that partner with the Hospital. The Hospital will attempt to identify suppliers that have risks of forced labour and child labour and will eliminate future use of their products or services while being cognizant of any economic hardship that could ensue.

**Remediation Action** *(any measures taken to remediate any forced labour or child labour)*

Almonte General Hospital has not identified any supplier that has the risk of forced labour or child labour. Due to the lack of findings, the Hospital has not taken any remediation actions to eliminate forced labour or child labour within its organization. The Hospital will stay vigilant and continuously monitor for any forced labour and child labour within its supply chain partnerships.

**Mitigating Income Loss** *(any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains)*

Almonte General Hospital 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 our supply chain activities. The Hospital will continue to diligently review and assess the potential of income loss and ensure our supply chain partners are taking immediate action to remediate the situation.

**Employee Training** *(the training provided to employees on forced labour and child labour)*

Almonte General Hospital has reviewed the requirement with its sole employee in the department. In 2024/25, mandatory training about the Act and its requirements will be implemented with the employee. The employees are aware of the supplier attestation within the organization's tendering documents and understand the importance of removing forced labour and child labour from supply chains.

Information sessions about the Act and the Hospital's obligations under the Act will be provided to the Hospital's management team. These information sessions will occur in fiscal 2024/2025.

**Effectiveness Evaluation** *(how the government institution assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains)*

Almonte General Hospital does not currently have policies in place to assess the effectiveness of its efforts to ensure forced labour and child labour are not being used in its supply chain activities. Policies and procedures to assess the effectiveness of our actions will be reviewed and implemented in fiscal 2024/2025. The Hospital will monitor and engage with its supply chain partners to understand the impact our actions are having on the reduction of forced labour and child labour in our supply chains.

**Documentation**

The Hospital keeps thorough and proper records to support the claims made throughout this Report.

**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.



Date: May 28, 2024

Lyman Gardiner  
Allied Boards Chair

I have the authority to bind the Almonte General Hospital.