



Exceptional Care – Exceptional People

The Supply Chains Act Report 2023-2024

The Brant Community Healthcare System (“BCHS”) is defined as an “Entity” under the *Supply Chains Act* and, therefore, must submit an annual report to the Minister of Public Safety by May 31 of each year. Reports must detail the steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used by BCHS in our supply chains.

All reports will be made available to the public in two ways:

- In a prominent location on BCHS’s website
- In an electronic registry on Public Safety Canada’s website

The following information uses the Minister’s online questionnaire as the template for the report.

Questionnaire Reponses

#	Question	Response
1	This Report is for	An Entity
2	Legal Name	Brant Community Healthcare System
3	Financial Reporting Year	April 1, 2023 to March 31, 2024
4	Is this a revised version	No
5	Business Number	118817014RR0001
6	Is this a joint report	No
7	Is the entity subject to reporting in another jurisdiction	No
8	Which categorizations applies to the entity	<p>Canadian business presence:</p> <ul style="list-style-type: none"> • Has a place of business in Canada • Does business in Canada • Has assets in Canada <p>Meets size-related thresholds:</p> <ul style="list-style-type: none"> • 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 • Employs an average of at least 250 employees for at least one of its two most recent financial years
9	Which sectors or industries does the entity operate in?	Health care and social assistance
10	In which country is the entity headquartered or principally located	Canada
10.1	In which province or territory is the entity headquartered or principally located	Ontario
11	Government institutions only	Not applicable

Annual Report

1	<p>What steps has the entity taken in the 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 in Canada or elsewhere by the entity or of goods imported into Canada by the entity</p>	<p>In the fiscal year ended March 31, 2024, Brant Community Healthcare System took the following steps identified by Public Safety Canada to prevent and reduce the risk that forced labour or child labour is used at any step in its business or supply chains: (1) investigating international purchases, and (2) determining organizational risk and supply chain channels.</p>
2	<p>Please provide additional information describing the steps taken (if applicable).</p>	<p>For the fiscal year ended Marcy 31, 2024, Brant Community Healthcare System investigated imports and purchases within the organization. Our view is that supply chain exposure is limited, as most of our supply purchases are governed by two group purchasing offices (Mohawk Medbury Corporation and Compass Canada). Brant Community Healthcare System has written confirmation that both suppliers take various steps to combat the risk of forced labour and child labour in their supply chains. Outside of these purchasing offices, additional purchasing agreements are also leveraged with other group purchasing offices. The bulk of these purchases are made through US distributors.</p>
3	<p>Which of the following accurately describes the entity's structure?</p>	<p>Not-for-profit incorporated organization</p>
4	<p>Which of the following accurately describes the entity's activities?</p>	<p>Importing into Canada goods produced outside Canada</p>

<p>5</p>	<p>Please provide additional information on the entity's structure, activities and supply chains.</p>	<p>In 1999, The Willett Hospital in Paris and the Brantford General Hospital became the first two partners in The Brant Community Healthcare System. With a total of 324 beds, the BCHS is an affiliated teaching site of McMaster University Michael G. DeGroote School of Medicine. Brantford General Hospital is a regional acute health centre and the Willett site provides urgent care and ambulatory services.</p> <p>Brant Community Healthcare System has internal policies and procedures in place governing employee conduct and procurement matters. Our Procurement Policy and standard operating procedures, as well as our Code of Conduct [require employees, directors, officers, and contractors to apply with applicable laws, rules and regulations, including those with respect to forced labour and child labour. Employees are required to review and sign off on the Code of Conduct annually. Failure to abide by these terms may result in termination of employment or a contractual relationship with Brant Community Healthcare System.]</p> <p>Our prime GPO has taken the following steps to mitigate the risk of forced and child labour in our supply chains: (i) Modified standard contract language "Representation and Warranties" section: "The goods and any services provided by the Supplier under this agreement are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada's Fighting against Forced Labour and Child Labour in Supply Chains Act). (ii) Modified competitive procurement templates to include language that supplier must attest to: "Warrants that the goods and services that the Proponent is proposing to provide to the Purchaser are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act). (iii) If the GPO is made aware of any instances where forced labour or child labour exists in supply chains, they will inform TOH. (iv) Developing internal policy and training for those in sourcing and supply chain roles.</p>
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6	Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?	Yes. Of the options provided by Public Safety, we embed responsible business conduct into our policies and management systems as described below.
7	Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour.	As stated above, the majority of our supply purchases are governed by two group purchasing offices ("GPOs"). We have been advised that our prime GPO has taken the following steps to mitigate the risk of forced and child labour in our supply chains: (i) Modified standard contract language "Representation and Warranties" section: "The goods and any services provided by the Supplier under this agreement are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada's Fighting against Forced Labour and Child Labour in Supply Chains Act). (ii) Modified competitive procurement templates to include language that supplier must attest to: "Warrants that the goods and services that the Proponent is proposing to provide to the Purchaser are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act). (iii) If the GPO is made aware of any instances where forced labour or child labour exists in supply chains, they will inform TOH. (iv) Developing internal policy and training for those in sourcing and supply chain roles. Our second primary GPO has advised us of similar steps it has taken, including: (i) adherence to various internationally recognized human rights standards, (ii) the implementation of various policies, including a Code of Business Conduct, Code of Ethics, Global Supplier Code of Conduct, Human Rights Policy, Global Supply Chain Integrity Policy, and independent confidential reporting program to report violations.
8	Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?	No
9	Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?	Not applicable. We have not identified any forced labour or child labour in our activities and supply chains.
10	Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable)	Not applicable

11	Has the entity taken any measures 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?	Not applicable. We have 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 activities and supply chains
12	Please provide additional information on any measures the entity has 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 (if applicable)	Not applicable.
13	Has the entity taken any measures 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?	Not applicable.
14	Please provide additional information on any measures the entity has 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 (if applicable)	Not applicable.
15	Does the entity currently provide training to employees on forced labour and/or child labour?	No
16	Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable).	Not applicable.
17	Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable).	Not applicable
17.1	Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?	Yes
18	Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child	Our Procurement Policy and standard operating procedures are under review at the time of preparing this report.

labour are not being used in its activities and supply chains.	
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Attestation

This report has been approved by the Board of Directors of Brant Community Healthcare System on its own behalf.

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. For clarity, I am providing this attestation in my capacity as a director and officer of Brant Community Healthcare System, and not in my personal capacity.

Full name: **Peter Quinlan**

Title: **Chair of the Brant Community Health Care System Board of Directors**

Date: *MAY 28/2024*

Signature *Peter Quinlan*

I have the authority to bind the Brant Community Healthcare System