



**BILL S-211 REPORT An Act to enact the Fighting Against  
Forced Labor and Child Labor in Supply Chains Act and to  
amend the Customs Tariff**

**For the fiscal year ending March 31, 2024**

**Approved by the Board of Directors on  
May 29, 2024**

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## Executive Summary

Cambridge Memorial Hospital (“CMH”) is committed to providing exceptional health care to the communities we serve as we look to create healthier communities, together. We are a values-based organization committed to a process of continuous quality improvement. Through our values of accountability and respect, we strongly believe that public reporting of performance indicators leads to system-wide benefits and best practices. CMH’s ethical standards are outlined in our “Human Rights”<sup>1</sup> and “Respectful Workplace Program”<sup>2</sup> policies. CMH employs just over 1,700 physicians, midwives and staff and is required to comply with several statutes, including the Ontario Human Rights Code<sup>3</sup> and Employment Standards Act, 2000<sup>4</sup>.

CMH acknowledges and is committed to comply with Bill S-211: Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“Act”). CMH views the Act as a necessary step forward to combat forced and child labour and to facilitate and track the work as the years progress. This annual report is CMH’s first report under this legislation and is prepared in compliance with section 11 of the Act for the financial reporting year of April 1, 2023 to March 31, 2024. It outlines CMH’s work completed in relation to this legislation.

Cambridge Memorial Hospital recognizes the continuous work required to help prevent and stop forced and child labour in supply chains. Through annual reporting, CMH commits to ongoing updates to develop adequate policies and provide training programs for staff who will work to ensure CMH’s supply chain is free of forced or child labour.

CMH’s annual report will be available to the public online for viewing and download at: [www.cmh.org](http://www.cmh.org)

## **Section 11 Response**

During the previous fiscal year, CMH has leveraged the majority of our contracts through Mohawk Medbuy Corporation (MMC) for consumables, services and capital equipment. MMC have updated their RFP and contract templates to include language focused on preventing and reducing the risk of forced or child labour being used by suppliers or in their supply chain. While CMH has not completed a full review of the minority of contracts that fall outside of MMC's contract scope, CMH is not aware of any instances of forced or child labour being used in those contracts. Moreover, MMC and CMH have not been made aware of any instances where forced labour or child labour exist in current supply chains. Should any issues be identified, CMH will investigate accordingly. CMH will continue to work with MMC during this upcoming fiscal year as they formalize their commitment to sustainability and Environmental, Social and Governance ("ESG") practices through the creation of a dedicated ESG team to enable a cohesive, sustainable health care supply chain.

## **Section 1: Structure, Activities and Supply Chains**

Cambridge Memorial Hospital is an acute care hospital corporation based in Cambridge, Ontario and is governed by a Board of Directors. With an employee count of 1,720 physician & employees, CMH services the growing and diverse populations of Cambridge, North Dumfries and the Region of Waterloo and is a teaching hospital affiliated with McMaster University. CMH operates from its Cambridge, Ontario location and does not have any additional sites. A separately incorporated corporation not controlled by the hospital operates a gift shop on the hospital's premises and at times provides donations to the hospital through its proceeds. CMH also leases spaces to third-party entities for the provision of food services or clinical services. CMH sells medical supplies to patients for a fee where they are not otherwise funded by the provincial health insurance plan ("OHIP"). Examples include but are not limited to: orthopedic supplies such as casts; braces; premium cataract lenses.

CMH is a member of a Shared Service Organization, MMC, which negotiates capital, consumable and service contracts on behalf of CMH. Most procurement activities at CMH are awarded to vendors who participate in a competitive process and are qualified by and managed through the initiatives run by MMC. CMH also utilizes other Shared Service Organizations such as Health Pro Canada, Ontario Education Collaborative Marketplace, Ministry of Ontario – Vendor of Records Arrangements and Kinetic GPO. The majority of goods procured by CMH in the last year have been from the Canadian market and delivered by a network of local distribution sites. Due to the specific needs of the medical

community, some items are unable to be sourced locally and are therefore procured from international sources in accordance with Ontario's Broader Public Sector Procurement Directive and related policies.

MMC and CMH are not aware of any instances where forced labour or child labour exist within our supply chain. CMH is committed to monitoring this matter and will make reports if applicable.

## **Section 2: Policies and Due Diligence Processes**

CMH belongs to MMC who facilitate the majority of the contracts we leverage. MMC has attested to (see letter from MMC to members, March 13, 2024)<sup>5</sup> modifying their standard contract language and their competitive procurement templates to include language that supports the reduction of forced and child labour. MMC and CMH have not been made aware of any instances where forced labour or child labour exist within our current supply chain. CMH is also committed to our obligations mandated by the government, such as Ontario Human Rights Code<sup>3</sup> and Employment standards Act<sup>4</sup> and are guided by our corporate policies on Health & Safety, Human Rights Policy, Whistleblower Policy, Abuse – Child and Duty to Report, and Respectful Workplace Program. CMH does not currently have a specific policy on forced labour or child labour in direct relation to our supply chain but is committed to reviewing its policies and practices.

## **Section 3: Risks and Management of Risks**

CMH acknowledges that procurement and supply chains can carry risk of forced labour or child labour in a direct or indirect way. CMH has not specifically begun work to identify parts of our supply chain or activities that carry a risk of forced labour or child labour outside of the work completed by MMC. As mentioned previously in the report, CMH leverages contracts set up through MMC, who have confirmed their due diligence and compliance with the Act<sup>5</sup>. As of today, CMH and MMC have not been made aware of any instances where forced labour or child labour exists in our current supply chain.

## **Section 4: Remediation Measures**

CMH is committed to meeting our standard obligations set forth by our Provincial and Federal governments. CMH and MMC have not been made aware of any instances of forced or child labour within our supply chain. Accordingly, CMH has not taken any direct

measures of remediation work aimed to counteract or address any human rights harms that may have occurred within our supply chain.

### **Section 5: Remediation of Loss of Income to the Vulnerable Families**

CMH and MMC have not been made aware of any instances of forced or child labour within our supply chain. Accordingly, CMH has not taken any measures to combat or eliminate forced labour or child labour nor has it taken measures to remediate loss of income.

### **Section 6: Employee Trainings and Communications**

CMH has participated in educational sessions offered by the Ontario Hospital Association, MMC and the Federal Government related to the new Act. To date, CMH has not provided in-depth training on forced labour and child labour to employees but intends to support staff on a go forward basis with education and training on this issue.

### **Section 7: Assessing Effectiveness**

Cambridge Memorial Hospital understands that fighting against forced labour and child labour requires a continuous review of our ever-evolving supply chain. No actions in the past reporting year have been taken to assess CMH's effectiveness in preventing and reducing risks of forced and child labour in supply chains. CMH commits to ongoing reviews, when required, regarding our supply chain policies and to working collaboratively with MMC to reduce the risk of the use of forced labour and child labour in our supply chain. MMC has committed<sup>5</sup> to creating a dedicated ESG team responsible for program development to ensure ongoing work continues.

## Attestation

**Reporting Entity's Legal Name: Cambridge Memorial Hospital**

**Reporting Year: April 1, 2023 to March 31, 2024**

In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for the entity listed above. Based on our knowledge, and having exercised reasonable diligence, we 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.

We further attest that the Board of Directors of Cambridge Memorial Hospital has reviewed and approved this report.

We have the authority to bind Cambridge Memorial Hospital

Date: May 29, 2024



Signed Nicola Melchers

Director and Chair of the Board of Directors



Signed Patrick Gaskin

President & CEO, Cambridge Memorial Hospital and Secretary, Board of Directors

## References

1. Human rights policy – available upon request
2. Respectful workplace program – available upon request
3. Ontario Human Rights Code, Ontario Human Rights Commission,

[The Ontario Human Rights Code | Ontario Human Rights Commission \(ohrc.on.ca\)](https://www.ohrc.on.ca)

4. Employment Standards Act, 2000 (ESA), Government of Ontario, Employment Standards Act, 2000, S.O. 2000, c. 41,

[Employment Standards Act, 2000, S.O. 2000, c. 41 \(ontario.ca\)](https://www.ontario.ca)

5. MMC Reporting for the Fighting Against Forced Labour and Child Labour in Supply Chains Act letter – dated March 13, 2024

**End of Report**