

**FIGHTING AGAINST FORCED LABOUR AND
CHILD LABOUR IN SUPPLY CHAINS ACT**

**CANCERCARE MANITOBA ANNUAL REPORT
FOR APRIL 1, 2023 – MARCH 31, 2024**

Introduction

This annual report has been prepared pursuant to CancerCare Manitoba's responsibilities and requirements under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act").

CancerCare Manitoba (CCMB) has determined it is an "Entity" as defined in the Act and therefore required to report on the organization's activities to mitigate the risk of forced labour and child labour being employed within the supply chain and its activities.

The Act came into force on January 1, 2024. This annual report is the first completed pursuant to the Act by CCMB.

Structure

CCMB is a health authority, designated as the cancer authority, and continued as a corporation under The Health System Governance and Accountability Act (Manitoba) which repealed the CancerCare Manitoba Act in 2023.

CancerCare Manitoba ("CCMB") has a legislated mandate to provide cancer control services including prevention, screening, diagnosis, treatment, and research of cancer and blood disorders for all Manitobans. CCMB provides leadership and clinical services related to cancer and blood disorders both directly and in partnership with other Health Authorities in Manitoba.

CCMB also works closely with Shared Health Manitoba ("Shared Health") who, pursuant to the Health System Governance and Accountability Act, is the Provincial Health Authority responsible for the coordination and delivery of provincial clinical programs in Manitoba not related to cancer. Shared Health also provides shared administrative services to Health Authorities with accountability that they describe which ranges from a Lead-and-Coordinate role to direct oversight and/or management of operations.

Supply Chain Management Shared Services ("SCMSS") is one shared administrative service provided by Shared Health. SCMSS enables the efficient acquisition of products, equipment and services to achieve the best overall value considering cost, quality and outcomes. The range of services includes strategic sourcing, contracting, value analysis, procurement and distribution/logistics. SCMSS works in collaboration with CCMB, other health organizations across Manitoba and the provincial clinical programs led by Shared Health.

CCMB's main provincial site for outpatient clinical services is located at 675 McDermot Ave in Winnipeg. Other cancer treatment sites are operated in partnership with the six other Health Authorities, including Shared Health (Health Sciences Centre) and at sites operated by the five regional health authorities. Cancer programs are also embedded within the operations of other health authorities or health facilities that are operated by the five regional health authorities.

CCMB also benefits from Shared Health's participation as a member of HealthPRO, a large national health care group purchasing organizations, alongside hospitals, provinces and shared service organizations from across Canada.

Oncology brand name drugs are negotiated nationally through the Pan Canadian Pharmaceutical Alliance (PCPA). CCMB participates in these negotiations, along with other provincial cancer agencies across Canada, which are undertaken directly with oncology drug manufacturers.

CancerCare Manitoba Activities

CCMB has determined it is engaged in the production, sale, importing, and distribution of goods as follows:

1. Pharmacy compounding of medications:
 - a. CCMB, through its Systemic Therapy Program and Provincial Oncology Drug Program, procures and compounds cancer medications that are not sold, but distributed and used for patient care throughout Manitoba in sites operated by Health Authorities where these programs are embedded.
2. Importing:
 - a. To support provincial clinical programs, CCMB purchases goods, either directly or through Shared Health, produced outside Canada from third party suppliers, where that third party is considered to be the importer for the purposes of the *Customs Act* but understands such is not considered importing under the Act.
 - b. However, CCMB, on as needed basis imports goods from distributors, with the assistance of a customs broker, if its existing suppliers cannot provide the goods. This importing mostly applies to medical supplies and generally such is imported from the United States.

Cooperation with Shared Health on Competitive Bid Processes

With the creation of the SCMSS within Shared Health, CCMB has transitioned to collaborating with the SCMSS to coordinate its competitive bid processes and purchasing activities, especially those where public bids are sought (e.g. RFP).

Prior to the transition, CCMB was responsible for purchasing products, services, and equipment directly from suppliers and still has some existing contracts. Most purchases are now made from contracts established by SCMSS with these suppliers; however, there may be some exceptions.

As noted above, CCMB benefits from Shared Health's involvement with HealthPRO which is a national group purchasing organization. Approximately 30% of Shared Health's goods and equipment contracts are committed to HealthPRO agreements and approximately 95% of Shared Health's pharmacy contracts are committed through HealthPRO agreements.

Steps Taken in Previous Financial Year (April 1, 2023 – March 31, 2024)

CCMB had not taken steps during 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 CCMB/Shared Health or of goods imported into Canada by CCMB/Shared Health.

Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

CCMB does not currently have any policies or due diligence processes (as described in the *OECD Due Diligence Guidance for Responsible Business Conduct*) in place related to forced labour or child labour. However, CCMB has hiring procedures that are designed to maintain compliance with federal immigration legislation and provincial employment legislation which addresses one form of child labour as defined in the Act i.e., *labour or services provided or offered to be provided by persons under the age of 18 years and that are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada.*

CCMB's hiring procedures are designed to maintain compliance with federal immigration legislation that requires permanent residency, citizenship, or a permit to work in Canada or the pending application for the same, and provincial legislation where CCMB must register to employ any foreign worker other than a Manitoba Provincial Nominee.

All prospective employees of CCMB including staff recruited for pharmacy services are recruited by advertising job opportunities on various career websites as well as the WRHA/Shared Health career website. Prospective employees are required to respond to the question "*Are you legally authorized to work in Canada?*" and the answer options are: "*a) authorized to work for any employer, b) authorized to work for my present employer only, c) I require sponsorship to work in this country*". As part of the internal controls of CCMB, applicants are required to accept an acknowledgement that states:

I understand that I am applying for employment within a site or service represented on the Winnipeg Regional Health Authority (WRHA)/Shared Health careers website. All information I provide as part of the application process is true and correct, and not misleading in any way. I understand that elements of my application may be checked, including references from prior employers, job history, education, and other qualifications and information provided by me. If it is found that I have misrepresented myself, my application may be disqualified; if I have been awarded a position, my employment may be terminated, regardless of how much time has elapsed. If I am offered employment, I will be required to supply satisfactory background checks as described in the written employment contract.

As a general practice, CCMB does not employ individuals under the age of 18 years. However, CCMB cannot prohibit employing persons who are under the age of 18 years as that would be considered age discrimination. CCMB has hiring procedures that are designed to maintain compliance with *The Employment Standards Code* (Manitoba) which non-exhaustively requires:

1. To not employ a person under the age of 13 years.
2. To employ a person that is 13 years or older but less than 16 years old requires a Work Readiness Certificate and/or a Child Employment Permit. The Work Readiness Certificate would certify they completed the Young Worker Readiness Certificate Program which pertains to labour rights and safety and include a signed consent of their parent to the employment.
3. To not employ a person under the age of 16 years between 11:00pm and 6:00am or for more than 20 hours during a week of school.

As per Section 4.1 of CCMB Policy #05.545 (Security Checks for Employment), all new hires are required to complete a criminal records check (including vulnerable sector search), adult abuse registry check, and child abuse registry check (“Security Checks”). In CCMB’s screening processes, the age of a worker (and the corresponding obligations/restrictions for employing same under *The Employment Standards Code* (Manitoba)) would be identified when reviewing the Security Checks. Section 5.4 of CCMB’s Policy #05.545 (Security Checks for Employment), provides if an applicant must commence employment before the Security Checks are obtained and provided to CCMB, the letter of offer to the applicant will contain a statement that the offer of employment is conditional on the return of satisfactory security check(s), as required, and the failure to return same on or before the date specified could result in the immediate termination of employment for cause.

Forced Labour and Child Labour Risks

CCMB did not start the process of identifying parts of its activities and supply chains that carry a risk of forced labour or child labour being used in the previous financial year.

Remediation Measures/Remediation of Loss of Income

CCMB did not undertake any measures to remediate any forced labour or child labour in its activities and supply chains in the previous financial year.

CCMB had also not 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.

Training on Forced Labour and Child Labour

CCMB does not currently provide training to employees on forced labour and/or child labour.

Policies and Procedures Assessing Effectiveness

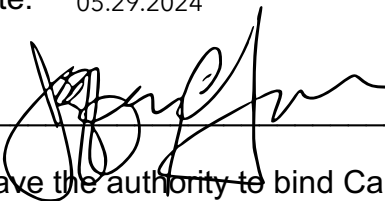
CCMB has no policy or procedure in place at this time to assess its effectiveness in ensuring forced labour and child labour are or are not being used in its activities and supply chains.

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 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.

Name: Mr. Jeoff Chipman

Title: CancerCare Manitoba Board Chair

Date: 05.29.2024



I have the authority to bind CancerCare Manitoba