

REPORT OF THE CENTRE FOR ADDICTION AND MENTAL HEALTH

Fighting Against Forced Labour and Child Labour in Supply Chains Act

A. This Report is provided by the Centre for Addiction or Mental Health (“CAMH”) for the fiscal year April 1, 2023 to March 31, 2024 (the “Reporting Period”). This is the first report prepared by CAMH pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), which came into force January 1, 2024.

B. **Structure, activities and supply chains:** CAMH is an academic health sciences centre and teaching hospital associated with the University of Toronto; it is Canada’s largest mental health hospital. CAMH provides health and mental health services, conducts research, and creates and disseminates academic materials. CAMH owns and operates its own outpatient pharmacy, which involves purchasing medication from wholesalers and drug manufacturers, which is repackaged into vials, labelled, and then sold to outpatients (i.e., attending outpatient clinics) and staff.

CAMH is a not-for-profit corporation under Ontario’s *Not-for-Profit Corporations Act* and a registered charity under the *Income Tax Act* (Canada).

CAMH has its own procurement office, and is additionally part of shared services organizations such as HealthPro, as well as OECM (The Ontario Education Collaborative Marketplace). CAMH has been the importer of record for goods from a number of countries.

C. **Steps taken to prevent and reduce risks of forced labour and child labour:** In order to comply with the Act, CAMH has initiated actions to prevent and reduce risks of forced and child labour. This includes engaging with CAMH’s supply chain partners and shared services organizations about measures they are taking to reduce risks around forced labour and child labour in their supply chain. Activities that CAMH has undertaken that will assist in identifying parts of its supply chain or operation that are at risk include: mapping its activities and supply chains, engaging with its supply chain partners on the issue of forced labour and child labour about measures taken to reduce risks around forced labour and child labour, and engaging with other stakeholders.

CAMH is part of the shared services organization HealthPRO, which has attested to adding measures to address Forced and Child Labour in all levels of supply chains, and that HealthPRO’s partners have multiple policies and processes to set expectations for suppliers regarding human rights and labour rights, including child labour and forced labour.

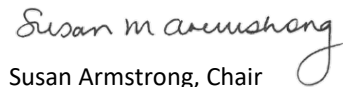
D. **Policy and due diligence processes:** CAMH is assessing its policies and processes to identify how it can best operationalize the requirements of the Act, reflecting CAMH’s commitment to respecting human rights in all aspects of its operations.

- CAMH is a publicly funded corporation falling under Ontario’s *Broader Public Sector Accountability Act* (“BPSAA”). CAMH is compliant with its requirements under the BPSAA, which includes formally adopting the Ontario Broader Public Sector (BPS) Supply Chain Code of Ethics. Under this Code, organizations must act and be seen to act with integrity and professionalism, and have fair and transparent supply chain activities, and be open and accountable. CAMH’s procurement policy requires the monitoring of and compliance with all requirements under the BPSAA.
- CAMH is a strong advocate of sustainable procurement, and integrates sustainability criteria into its procurement process, such as fair labour practices.

- E. Parts of operations or supply chain that carry risks of forced labour and child labour:** CAMH is analyzing its supply chain and operations to identify any risks of forced and child labour.
- F. Remediation measures:** No situations have arisen requiring implementation of such measures.
- G. Training provided to employees on forced labour and child labour:** CAMH has not yet implemented formal training for employees on forced labour and child labour, but will make available such training in the coming year to staff in sourcing and supply chain roles at CAMH.
- H. How CAMH is assessing its effectiveness in ensuring forced and child labour are not being used in its operations and supply chains:** CAMH remains committed to take the necessary steps to monitor the effectiveness of such measures once implemented. It is developing measures to ensure forced labour and child labour are not being used in its operation and supply chains.
- I. Approval and Attestation:** This Report was approved by the CAMH Board of Trustees as required by section 11(4)(a) of the Act, and provides the following 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. 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 Centre for Addiction and Mental Health.


Susan Armstrong, Chair
CAMH Board of Trustees
May 28, 2024