

Collingwood General and Marine Hospital

Report on Bill S211 Fighting Against Forced Labour and Child Labour in Supply Chains Act
For the year April 1, 2023, to March 31, 2024

Reporting entity's legal name: The Collingwood General and Marine Hospital

Financial reporting year: April 1, 2023, to March 31, 2024

Identification of a revised report: N/A

Business number: 106954522 RC0001

Identification of a joint report: N/A

Identification of reporting obligations in other jurisdictions: N/A

Entity categorization according to the Act: Entity (Hospital)

Sector/industry: Public Sector / Health Care

Location: Collingwood, Ontario, Canada

Organization Overview

The Collingwood General and Marine Hospital (CGMH) was founded in 1887 as an eight-bed facility in the community of Collingwood, Ontario, which in addition to caring for the people in the Collingwood area, was also one of the few hospitals, because of the prevalence of communicable diseases, that would accept sailors of the Great Lakes as patients. The Hospital is a non-profit, charitable organization.

Today, CGMH is an 84-bed facility serving the Georgian Triangle, which encompasses Collingwood, Wasaga Beach, Clearview Township and The Town of The Blue Mountains. Besides being one of the top four-season resort areas in Ontario, the Georgian Triangle is also one of the fastest growing areas in Canada.

CGMH provides acute care services including emergency medicine, general surgery and general medicine, diagnostic services including lab, imaging, and cardiorespiratory therapy. The Hospital also provides outpatient care including dialysis and a wide range of clinics including mental health and rehabilitation services.

In addition, CGMH provides care in specialty areas including obstetrics, orthopaedics, and intensive care, and is an integral part of the South Georgian Bay Ontario Health Team. By working co-operatively with other health care providers, CGMH can maximize its efficiencies, reduce costs, and ensure that the people of the area are educated about their own health and always have access, within the region, to the health services they require.

Structure, Activities, and Supply Chains

In addition to general hospital operations, CGMH operates a gift shop, selling various apparel, giftware, various food products, as well as an internally operated cafeteria that sells food and beverages.

The Hospital conducts procurement activities in accordance with its Procurement Controls and Process policy and Purchasing Code of Ethics policy, as well as relevant directives and trade agreements, including but not limited to:

- Broader Public Sector Procurement Directive
- Canadian Free Trade Agreement
- Canada-European Union Comprehensive Economic and Trade Agreement

Most goods and services purchased by the Hospital are from suppliers that are Canadian businesses or businesses with Canadian fulfillment addresses. For the reporting period of April 1, 2023, to March 31, 2024, the Hospital directly imported goods with a total value of \$71,000 through its customs broker which represents

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approximately 0.3% of all purchased goods. Of the 34 shipments received, 33 were from the United States of America and 1 was from Israel. Imported goods were medical supplies and information technology equipment.

Policies and Due Diligence

CGMH purchases contract management and supply chain management services through Shared Services West (SSW), which amalgamated with Mohawk Medbuy Corporation (MMC) on April 1, 2024. MMC is a national, not-for-profit, shared services organization supporting Canadian hospitals and health care providers drive value, efficiencies, and cost savings on the supplies and services they use. The Hospital conducts training semi-annually for the leadership team regarding procurement practices and policy expectations.

All procurements with a total cost of ownership more than \$25,000 are supported by SSW/MMC. Procurements below \$25,000 are decentralized, however, the Hospital incorporates review processes to ensure compliance with the Hospital's schedule of authorities. In cases where policy has not been followed, and the goods have already been received, services rendered, or a contract executed, the procurement team uses the opportunity to educate regarding policy requirements to reduce the risk of recurrence.

Where public competitive procurement is required, the Hospital engages in fair, open, and transparent processes. The Hospital also leverages collaborative procurement opportunities and vendor of record arrangements such as those available through SSW, MMC, HealthPro, or Supply Ontario, to increase efficiencies and achieve economies of scale.

Examples of goods and services procured by the Hospital to support operations include but are not limited to:

- Various medical and surgical supplies
- Laboratory supplies and chemicals
- Food and beverage products
- Various information technology products, services, and electronics
- Staff apparel
- Housekeeping supplies
- Medical equipment
- Furniture and fixtures
- Legal services
- Maintenance operating supplies and services
- Paper and office supplies
- Patient transportation services
- Waste management services
- Utilities
- Insurance and financial services

The Hospital's procurement policies currently do not specifically address forced labour or child labour. The Hospital commits to updating its policies accordingly in the upcoming year.

Areas of Risk

Based on a high-level environmental scan of the Hospital's supply chain, the Hospital is not aware of the use of forced labour or child labour for the goods imported into Canada directly, however, there is potential for gaps in our assessment. Although Canadian businesses or businesses with Canadian addresses form the majority of suppliers for the Hospital, there is a potential risk of forced labour and/or child labour further down the supply chain of our suppliers. At present, we are currently not aware of the use of forced labour or child labour in our supply chain. In the coming year, the Hospital commits to completing a full assessment and mapping of our activities and supply chain to better identify for the risk of forced labour or child labour.

Steps taken over last fiscal year to reduce risk of forced and child labour

Our procurement and supply chain providers SSW and MMC have confirmed that they have not been made aware of any instances where forced labour or child labour exists in our current supply chains. To further bolster efforts to ensure forced labour and/or child labour are not within the supply chains of hospitals, effective January 1, 2024, the following changes have been made to procurement practices conducted by SSW/MMC:

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- Contract language regarding Representation and Warranties modified to include: 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 Chain's Act).
- Competitive procurement templates (e.g. RFP), specifically the Proponent Confirmation Form, was modified to include the following language that suppliers/vendors bidding for hospital business 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);

Over the coming Fiscal Year, MMC will undertake iterative improvements to the activities relative to this legislation and healthcare supply chains, which includes developing internal policies and training for those in sourcing and supply chain roles. Additionally, MMC has formalized its commitment to sustainability and environmental, social, and governance (ESG) practices through the creation of a dedicated ESG team. This group is responsible for program development to ensure ongoing sustainability, and to support its members as an enabler of a cohesive, sustainable health care supply chain.

The Hospital's Purchasing Code of Ethics was last reviewed July 2023, however, this policy will be re-evaluated in the coming year to determine if the scope of application should be revised or broadened to include products or services related to other industries considered at-risk. Additionally, the Hospital has a Product Evaluation and Standardization Committee which is responsible for oversight of cost-efficient acquisitions, contract compliance, and standardization opportunities. This committee has not met over the past several years; however, we are committing to re-establishing this committee and adjusting its purview to include contract compliance and organizational effectiveness in ensuring that forced labour and/or child labour is not being used in our supply chain.

The Hospital currently does not have a policy or practices in place regarding measures taken to remediate any forced labour or child labour or remediating 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. The Hospital has not identified any forced labour or child labour in our activities and supply chain and therefore any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour.

The Hospitals current procurement education does not include education on the use of forced labour or child labour, and therefore will be updated and revised in the coming year to include this.

The Hospital currently does not have policies and procedures in place to assess our effectiveness in ensuring that forced labour and child labour is not being used in our activities and supply chains. The Hospital commits to creating policies and procedures in the coming year to address this.

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**Bill S211, Fighting Against Forced Labour and Child Labour in
Supply Chains Act**

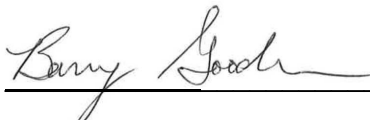
APPROVAL AND ATTESTATION

From: The Board of Directors (the “Board”) of the Collingwood General and Marine Hospital (the “HSP”)

Date: May 31, 2024

Re: April 1, 2023 – March 31, 2024 (the “Applicable Period”)

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 Collingwood General and Marine Hospital. 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.



Barry Goodwin, Board Chair

Collingwood General and Marine Hospital