



**Reporting for the Fighting Against
Forced Labour and Child Labour
in Supply Chains Act**

**Financial period,
April 1, 2023, to March 31, 2024**

Grand River Hospital Corporation



Prepared in accordance with the requirements of the “Fighting Against Forced Labour and Child Labour in Supply Chains Act”, (the “Act”) and in particular section 11

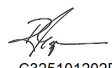
TO: The Board of Grand River Hospital Corporation, (the “Board”)
FROM: Kristen Warden
Director of Purchasing and Materials Management
Date: May 15, 2024
REPORTING PERIOD: **April 1, 2023, to March 31, 2024**

On behalf of Grand River Hospital, 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.

Ron Gagnon

CEO

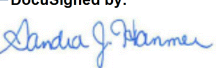
Grand River Hospital

DocuSigned by:

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[Signature]
Date: 5/31/2024

I have the authority to bind Grand River Hospital

I certify that this attestation has been approved by the Board of Grand River Hospital

DocuSigned by:

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[Signature]
Date: 5/31/2024
Sandra Hanmer

Chair of the Board



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Executive Summary

Grand River Hospital (GRH) is committed to delivering an exceptional health care experience with compassion, driven by inspired people, and unwavering quality focus, strong partnerships and innovative solutions. Through our core values of Care, Trust and be Trustworthy, and Courage to Start, Heart to Finish we believe that public reporting of performance indicators leads to system-wide benefits and best practices. GRH employs 4100+ staff members, 700+ physicians, dentists, midwives and nurse practitioners, 600 volunteers and 1600 learners, and is required to comply with several statutes including the Ontario Human Rights Code and Employment Standards Act, 2000.

GRH acknowledges and is committed to complying with Bill S-211: Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“Act”). GRH 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 GRH’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.

GRH understands the process of fighting against forced labour and child labour in supply chains is complex and evolving. Hence, the adoption of the Act requires execution of ongoing and iterative processes in our organization. As such, GRH will continue to explore opportunities to improve and enhance supply chain transparency, to develop policies and training programs for its employees.

GRH’s annual report will be available to the public online for viewing and download at:

<https://www.grhosp.on.ca/about/accountability-plans>



Section 1: Structure, Activities and Supply Chain

Grand River Hospital (GRH) is a 680 bed comprehensive community hospital located in Kitchener, ON that provides patient-centered care to residents in the Region of Waterloo and the surrounding communities. GRH is the largest health service provider in Waterloo Wellington.

GRH services are defined by our 15 clinical programs and services:

- Cancer Care
- Childbirth
- Children's
- Complex Continuing Care
- Critical Care
- Emergency Medicine
- Laboratory Medicine
- Medical Imaging
- Medicine
- Mental Health and Addictions
- Pharmacy
- Rehabilitation
- Renal
- Stroke
- Surgery

Projected volumes for 2023/24 are:

23,389	Admissions
57,272	Emergency visits
4,105	Births
7317	Day surgery cases
249,762	Ambulatory visits

GRH employs 4,100+ staff, 29 midwives, 690 medical/dental staff and supported by 600 volunteers.

GRH has two main campuses, the Kitchener-Waterloo (KW) campus and the Freeport campus.

The purchasing department manages Grand River Hospital's procurement processes. This includes the acquisition, distribution, control and disposal of goods, services and equipment necessary to support the activities of the hospital.

For major medical supply purchases (OR, Medical Imaging, Pharmacy Drugs & General Med Surgical supplies), GRH primarily manages its sourcing and procurement activities through Group Purchasing Organizations Mohawk Medbuy Corporation (MMC). GRH also uses several other Group Purchasing Organizations, Shared Service Organizations, and Vendor of Record agreements available to us as a Public Healthcare entity such as:

- HealthPro Canada
- Kinetic GPO
- Healthcare Materials Management Services (HMMS)
- Ontario Education Collaborative Marketplace (OECM)
- Ministry of Ontario – Vendor of Record Arrangements



- Grand River Cooperative Purchasing Group (GRCPG)

The majority of goods and services required by GRH are procured from the Canadian market. However, depending on the nature of the products and their availability, some items may be sourced from outside of Canada. As mentioned above, regardless of the sourcing location most of the procurement activities of GRH, including supplier and product identification and qualification, are managed by shared service groups.

Section 2: Policies and Due Diligence Processes

Grand River Hospital is a member of Mohawk Medbuy Corporation group purchasing organization, which manages the majority of contracts utilized at GRH. MMC has confirmed in a letter to its members that they have adjusted their standard contract language and competitive procurement templates to incorporate clauses aimed at reducing forced and child labor as per this Act. GRH has also modified their competitive procurement template questions to include the following question that the 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)”. GRH procurement team is working with its internal legal department to update vendor handbook, as well as standard contract language to include Forced and Child Labour. Neither GRH or MMC have been notified of any instances of forced labour or child labour within our present supply chain.

Section 3: Risks and Management of Risks

GRH acknowledges the potential risks of forced labour or child labour within their procurement and supply chain either directly or indirectly, and recognizes the need for organizations to implement steps to both identify and prevent these risks through appropriate due diligence. GRH has only just initiated direct efforts as noted above, aside from the work already undertaken by MMC to identify specific areas or activities in supply chain that may pose such risks. GRH relies on contracts facilitated through MMC who have confirmed their due diligence and compliance with the Act.

As of today, GRH and MMC have not received any reports of forced labour or child labour within their current supply chains. MMC has assured GRH that if they are made aware of any instances where forced labour or child labour exists in supply chains, they will inform GRH.

Section 4: Remediation Measures

GRH has not done any remediation work to date as we have not yet found any instances in which forced or child labour exists.

Section 5: Remediation of Loss of Income



GRH has not done any remediation work to date as we have not yet found any instances in which forced or child labour exists.

Section 6: Training

GRH has engaged in educational sessions provided by the Ontario Hospital Association, Mohawk Medbuy, and the Federal Government concerning the new Act. As of now, GRH has not conducted comprehensive training for its employees on the topics of forced labor and child labor.

MMC has committed to creating a dedicated and environmental, social and governance (“ESG”) team which will include training and implementation support and GRH will be an active participant in these activities.

Section 7: Assessing Effectiveness

GRH understands the process of fighting against forced labour and child labour in supply chains is complex and evolving. Hence, the adoption of the Act requires ongoing and iterative processes in our organization. No actions in the past reporting year have been taken to assess GRH’s effectiveness in preventing and reducing risks of forced and child labour in supply chains. GRH will continue to work closely with other entities such as OHA, MMC and Regional partners as respective policies and trainings for employees are developed.

Appendix A: MMC Letter Dated March 13th, 2024





To MMC Members -
Bill S211.pdf



March 13, 2024

Reporting for the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Dear Member,

We provide this letter in connection with Bill S-211, the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Act”, “Bill S-211”, “the Bill”).

In providing this letter, we have exercised care and diligence that would reasonably be expected of a Chief Operating Officer and Chief Financial Officer, Chief Information Officer & VP, Business Analytics, in these circumstances.

The following steps have been undertaken at MMC during the current fiscal year and may be included for completeness in legislative reporting undertaken by the Hospital for compliance with Bill S-211.

- MMC has modified standard contract language to include the following in Representation and Warranties:
 - 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).
- MMC has modified competitive procurement templates (e.g. RFP), 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);
- MMC has not been made aware of any instances where forced labour or child labour exists in current supply chains, but should such instances come to light, MMC will inform your Chief Financial Officer.
 - Over the coming periods, MMC is planning iterative improvements to the activities undertaken relative to this legislation and health care supply chains. These include the development of internal policy and training for those in sourcing and supply chain roles.
- MMC formalized its commitment to sustainability and ESG practices through the creation of a dedicated ESG team. This group is responsible for program development to ensure our organization’s ongoing sustainability, and to support our Members as an enabler of a cohesive, sustainable health care supply chain.

Sincerely,

MOHAWK MEDBUY



Tom Warner
CFO, CIO and VP, Business Analytics
twarner@mohawkmedbuy.ca



Peter Longo,
Chief Operating Officer
plongo@mohawkmedbuy.ca