

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

Financial period,

April 1, 2023, to March 31, 2024

Halton Healthcare

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 Halton Healthcare, (the "Board")

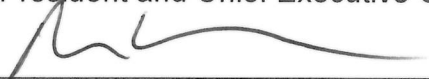
FROM: Melissa Farrell
President & Chief Executive Officer

Date: May 9, 2024

REPORTING PERIOD: April 1, 2023, to March 31, 2024

On behalf of Halton Healthcare, 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.

Melissa Farrell
President and Chief Executive Officer



Signature

May 9, 2024
date

I have the authority to bind Halton Healthcare.

I certify that this attestation has been approved by the Board of Halton Healthcare on May 9, 2024.

Samantha Horn
Chair of the Board



Signature

May 9, 2024
date

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Executive Summary

Bill S-211, known as the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”), came into force on January 1, 2024. This annual report, prepared in compliance with section 11 of the Act for financial reporting year of April 1, 2023, to March 31, 2024, outlines Halton Healthcare’s key activities related to this legislation.

Recognizing the complexity and evolving nature of combating forced labour and child labour in supply chains, Halton Healthcare commits to continually exploring opportunities to enhance supply chain transparency and will strive to develop adequate policies and training programs for its employees.

Section 1: Structure, Activities and Supply Chains

Structure

Halton Healthcare is a healthcare organization comprised of three community hospitals and numerous community-based services in the growing urban and rural communities of Halton Hills, Milton, and Oakville. Halton Healthcare is governed by a voluntary Board of Directors.

Activities

Halton Healthcare provides a wide range of healthcare services, including emergency care, surgeries, maternity services, diagnostic imaging, rehabilitation, mental health services, and specialized treatments and tests.

Supply Chain

The primary procurement activities involve sourcing and purchasing medical supplies, equipment, pharmaceuticals, and other necessary items and services for the hospital. Sourcing and procurement activities are mostly managed by shared service organisations. This is primarily Shared Services West (SSW) which became integrated with Mohawk Medbuy Corporation (MMC), effective April 1st, 2024. Additionally, Healthpro Canada has been engaged to procure some medical supplies.

The majority of Halton Healthcare’s goods and services are procured from the Canadian market, however depending on the type of products and the availability, they could be sourced from abroad. Regardless of the location of the suppliers and whether they are sourced locally or through imports most procurement activities, including the identification and qualification of supplier and products, are managed by shared service groups.

Halton Healthcare does not have any material production of goods. Halton Healthcare manages multiple gift shops at its sites. Items sold in these locations are purchased from local distributors. Most other retail spaces at Halton Healthcare are rented to third party operators that conduct their own procurement activities.

Section 2: Policies and due diligence processes

Halton Healthcare does not have policies and processes that specifically and directly address the issues of forced labour and child labour. However, there are general policies such as the code of conduct for staff which sets the expectation for respectful, professional, and ethical behaviour as well as compliance with applicable legislation and regulations.

In addition, together with SSW and MMC, we have modified purchasing processes and policies. A new form has been added to the standard sourcing (RFx) packages where we request the proponents to warrant that the goods and services that the proponent is proposing are not the result of, and in no way involve, forced labour or child labour. In addition, a new provision has been added to the standard Purchase Agreement Templates, under Supplier's Representations, Warranties, Covenants section, where suppliers must confirm the goods and any services provided by them under the agreement are not the result of, and in no way involve, forced labour or child labour.

Section 3: Risks and management of risks

Through the work and assessments done to date, Halton Healthcare has not identified and has not been made aware of any instances where forced labour or child labour exists in its supply chains.

The majority of Halton Healthcare's sourcing and procurement activities are managed by shared service organisations. These activities represent the most significant risk considering this is how most of Halton Healthcare's goods and services are procured. We have received, confirmation letters from each of those organisations, where they confirmed their due diligence and compliance with the Act. As of today, they have 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, they will inform Halton Healthcare. In addition, they have added new provisions and requirements to the standard sourcing (RFx) documents and contracts, to ensure compliance of suppliers with the Act.

Distribution and logistics of goods at Halton Healthcare is an internal process, and is managed by the hospital's employees, who are protected by various employment and human rights regulations.

Section 4: Remediation of risks

We have exercised care and due diligence to assess Halton Healthcare's supply chain and to date, we have not identified any areas of risks.

Section 5: Remediation of loss of income to the vulnerable families

We have exercised care and due diligence to assess Halton Healthcare's supply chain and to date, we have not identified any areas of risks.

Section 6: Employee trainings and communications

Communication to employees, particularly those involved in procurement, is important to increase awareness and provide information to staff on their role in addressing this issue. To accomplish this our share service organization is expected to provide a review of this legislation at an upcoming leadership meeting.

Additionally, we are in contact with other organisations such as Ontario Hospital Association (OHA), other hospitals and shared service organizations (mainly MMC) for potential partnership in development of learning resources.

Section 7: Ensuring effectiveness

We understand 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 organisation.

Halton Healthcare does not currently have any direct assessment processes that determine the effectiveness in ensuring that forced labour and child labour are not being used in our activities and supply chains. Given that our procurement processes and supply chain activities are coordinated by group purchasing organizations we are working closely with these organizations to ensure that the procurement processes and supply chain activities have robust controls in place to ensure forced labour and child labour are not being used by our suppliers and in our supply chains. We will continue to work closely with other entities, such as OHA and MMC, to develop respective policies and trainings for our employees.

In addition, our supporting shared services organisations (MMC and HealthPro) are committed to incorporate iterative improvements to the activities undertaken relative to this legislation and healthcare supply chains, including the development of internal policy in their organisations and training for those in sourcing and supply chain roles.

References

1. SSW Attestation Letter
2. Healthpro Attestation Letter



SSW

*Integrating for Value
Leaders in Service*

March 6, 2024

Melissa Farrell
President & CEO
Halton Healthcare
3001 Hospital Gate Oakville, ON, L6M 0L8

Dear Ms. Farrell,

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

We provide this letter in connection with the compliance of **Halton Healthcare (“you”, “your”, “Hospital”)** sourcing activities administered and facilitated by **Shared Services West (“SSW” or “us”)** from **April 1, 2023 to March 31, 2024 (“the Applicable Period”)** with Bill S-211, the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“the Act”, “Bill S-211”, “the Bill”).

For sourcing activities managed by SSW, including where such activities resulted in importing of goods where the Hospital is the importer of record, this attestation applies only to these activities. For sourcing activities managed or facilitated by other shared service sourcing or distributing organizations (**“Other SSO”**), or those activities directly undertaken by the Hospital that include importing, producing, selling, or distributing, the Hospital should assess the applicability of these activities to the Act and supplement the legislated reporting. Note, SSW does not meet the thresholds of a reporting entity as defined by the Act and will not be undertaking the process of reporting to Public Safety Canada.

In providing this report, we have exercised care and diligence that would reasonably be expected of a **President & CEO, Vice President Finance & Integration, and Vice President Sourcing, Operations & Member Engagement**, in these circumstances, including reviewing and updating internal processes, making reasonable inquiries of staff that have knowledge of these matters, and engaging with supply chain partners through procurement processes.

The following steps have been undertaken at SSW during the Applicable Period and may be included for completeness in legislative reporting completed by the Hospital for compliance with Bill S211.

- SSW has modified standard contract language beginning January 1, 2024, to include the following in section 6.1 – 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 Chain’s Act).*
- SSW has modified competitive procurement templates (e.g. RFP), specifically the Proponent Confirmation Form, 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);*

Northgate Business Park, 1107 Clay Avenue, Suite 500, Burlington ON L7L 0A1

- SSW 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, SSW will inform your Chief Financial Officer.
- Over the coming periods SSW and MMC are planning iterative improvements to the activities undertaken relative to this legislation and healthcare supply chains, these include the development of internal policy and training for those in sourcing and supply chain roles.

Yours truly,



Karen Belaire (Mar 7, 2024 08:25 EST)

Karen Belaire
President & CEO



Anisha Sinha (Mar 7, 2024 07:48 EST)

Anisha Sinha
Vice President Sourcing, Operations & Member Engagement



Kyle Watts (Mar 6, 2024 16:38 EST)

Kyle Watts
Vice President Finance & Integration

April 17, 2024

Kent Baartman
Director, Financial Planning, Reporting and Compliance
Halton Healthcare
3001 Hospital Gate
Oakville, ON L6M 0L8

Dear Mr. Baartman:

Re: HealthPRO Canada's steps taken during the period April 1, 2023 – March 31, 2024 to prevent and reduce the risk of forced and child labour on contract items

Thank you for your continued support of HealthPRO Canada and your participation in our contracts. As your national group contracting provider for healthcare products and services, we understand the importance of our contracting processes complying with Canadian regulations.

We have reviewed our contracting processes and documents and can confirm the following:

- HealthPRO Canada Nutrition and Food, Capital Equipment, Support Services, and Clinical contracts commencing April 1, 2023 or afterward included a scored question in the RFPs related to the Suppliers' public facing commitment to eliminate Forced Labour as defined by the International Labour Organisation's Forced Labour Convention. This was implemented for Pharmacy Services contracts commencing after September 2023. The question scores suppliers based on how well their public-facing commitment addresses the [11 indicators](#) of forced labour.
- Although not part of any contracts starting within the 2023/24 fiscal year, HealthPRO Canada added additional informational questions regarding suppliers' reporting experience and any continuous improvement measures they have taken to address Forced and Child Labour within all levels of their supply chains.
- HealthPRO Canada's Nutrition and Food Services partner Complete Purchasing Services "CPS" (Starting October 1, 2023), strictly requires that its suppliers comply with all applicable laws, and, in addition, have multiple policies and processes to set expectations for suppliers regarding human rights and labour rights (including child labour and forced labour).
- Contracts that Halton Healthcare are committed to that started during the 2023/24 fiscal year are attached for your records.

If you require additional information, please contact Ms. Kendra Frey, Vice President of Materials Management (905-568-3478, ext. 1320).



Yours sincerely,

A handwritten signature in black ink that reads "Christine Donaldson". The signature is written in a cursive, flowing style.

Christine Donaldson
Interim President & CEO
HealthPRO Procurement Services Inc.

Category	Contract No.	Contract Name	Start Date	End Date	Supplier Name
DE	07115	Revitalized Nutrition & Food Program	2023-10-01	2026-09-30	Complete Purchasing Services
DE	06227	APPLESAUCE SHELF STABLE - PORTION	2023-04-01	2025-03-31	Leahy Orchards
DE	04747	BEVERAGE THICKENED - PORTION WITHOUT MILK	2023-04-01	2025-03-31	Lyons Magnus
DE	05755	CHEESE PROCESSED - BULK & PORTION	2023-04-01	2025-03-31	Kraft Heinz Canada
DE	05209	CONDIMENTS - RELISH, VINEGAR & SALSA	2023-04-01	2025-03-31	Kraft Heinz Canada
DE	05431	CONDIMENTS APPLE BLEND - PORTION	2023-04-01	2025-03-31	Kraft Heinz Canada
DE	05054	COOKIES - SHELF STABLE	2023-04-01	2025-03-31	Mondelez Canada Inc.
DE	05055	CRACKERS	2023-04-01	2025-03-31	Mondelez Canada Inc.
DE	04760	FRUIT SHELF STABLE - PORTION & BULK	2023-04-01	2025-03-31	Shafer-Haggart Ltd.
DE	04754	JUICE BULK - SHELF STABLE & REFRIGERATED	2023-04-01	2025-03-31	PepsiCo Beverages
DE	04763	JUICE PORTIONED - SHELF STABLE & REFRIGERATED	2023-04-01	2025-03-31	Lyons Magnus
DE	04766	MEAL DELIVERY DISHWARE - DISPOSABLE	2023-04-01	2025-03-31	Burlodge Canada
DE	04765	MEAL DELIVERY DISHWARE - REUSABLE	2023-04-01	2025-03-31	Burlodge Canada
DE	05001	RICE DRY	2023-04-01	2025-03-31	Dainty Foods Ltd.
DE	02288	SAUCES SHELF STABLE - RTU	2023-04-01	2025-03-31	Kraft Heinz Canada
DE	01010	SEAFOOD RAW - FROZEN	2023-04-01	2025-03-31	High Liner Foods Canada
DE	04764	SEAFOOD VALUE ADD - FROZEN	2023-04-01	2025-03-31	High Liner Foods Canada
DE	05059	VEGETABLES - FROZEN	2023-04-01	2025-03-31	Nortera Foods Inc.
PH	TPN02_PHCL	40:12 REPLACEMENT PREPARATIONS	2023-12-01	2027-05-31	Fresenius Kabi Canada Ltd.
PH	02980a	20:12.04 ANTICOAGULANTS	2023-12-20	2027-05-31	Sterinova Inc.