



Reporting for the Bill S-211: *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Financial period:
FY 2023-24 (April 1, 2023, to March 31, 2024)

Hamilton Health Sciences Corporation

May 31, 2024



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 Hamilton Health Sciences, (the “Board”)
FROM: Tracey MacArthur
President & Chief Executive Officer
Hamilton Health Sciences
Date: May 30, 2024
REPORTING PERIOD: April 1, 2023, to March 31, 2024

On behalf of Hamilton Health Sciences, 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.

Tracey MacArthur
President and Chief Executive Officer
Hamilton Health Sciences
May 30, 2024.

Tracey MacArthur
Tracey MacArthur (May 31, 2024 07:24 EDT)

[Signature]

I have the authority to bind Hamilton Health Sciences

I certify that this attestation has been approved by the Board of Hamilton Health Sciences on May 30, 2024.

Keith Monroe
Keith Monroe (May 31, 2024 09:36 EDT)

[Signature]

Keith Monroe
Board Chair
Hamilton Health Sciences

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Executive Summary

Hamilton Health Sciences is a community of 15,000 staff, physicians, researchers and volunteers that proudly serves southwestern Ontario residents. We also provide specialized, advanced care to people from across the province.

HHS is the only hospital in Ontario that cares for all ages, from pre-birth to end-of-life. We offer world-leading expertise in many areas, including cardiac and stroke care, cancer care, palliative care and pediatrics.

As such, Hamilton Health Sciences (“HHS”) is committed to operating with integrity and high ethical standards, including respecting human rights.

In support of the passage of Bill S-211 *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, (the “Act”), HHS stands committed to complying and enforcing the Act at every level of its supply chain.

HHS understands that continuous and iterative processes within the organization are necessary to comply with the Act due to the complexity and dynamic nature of the fight against child labor and forced labor in supply chains. HHS is committed to continuously looking for ways to improve supplier chain transparency and will work to create suitable operational improvements and staff training initiatives.

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

- The HHS website: <https://www.hamiltonhealthsciences.ca/about-us/our-performance/financial-accountability/>
- In an electronic registry on Public Safety Canada’s website

Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour

Hamilton Health Sciences (“HHS”) is committed to preventing and reducing the risk of forced labour and child labour and has taken the following measures during the reporting period.

In the past financial year, Hamilton Health Sciences (“HHS”) has proactively addressed the critical issue of forced labor and child labor within its operations and supply chains, both domestically in Canada and internationally. Our organization has conducted an internal assessment of our vendor base to identify potential risks of forced labor and child labor across its activities and supply chains.

One key initiative implemented by HHS was the requirement for all vendors to have robust policies and procedures in place explicitly prohibiting the use of forced labour and child labour within their activities and supply chains. By mandating these policies, HHS not only reinforces its commitment to ethical business practices, but also sets clear expectations for its vendor partners regarding labour standards.

Additionally, HHS is currently in the process of developing and implementing child labour and forced labour protection into our procurement policies and processes. These initiatives aim to further safeguard against the exploitation of children within our operations and supply chains. To support this work and enforce compliance with ethical labor practices, HHS is also working to develop anti-forced labour and child labour contractual clauses, which will be integrated into vendor agreements.

HHS recognizes the importance of raising awareness and building capacity within its workforce and supply chain partners. To this end, HHS is seeking professional training and awareness materials specifically focused on forced labor and child labor. These resources will equip procurement staff and stakeholders with the knowledge and tools necessary to identify, prevent, and address instances of labor exploitation effectively.

In addition to internal efforts, HHS is actively engaging with its supply chain partners and peer hospitals on the issue of forced labor and child labor. Through collaborative initiatives and ongoing dialogue, HHS seeks to foster a collective commitment to address these challenges across the entire supply chain. By working together with vendors, HHS aims to implement sustainable solutions that promote ethical labor practices and protect human rights.

HHS’s multifaceted approach demonstrates its dedication to combating forced labor and child labor within its operations and supply chains. By conducting internal assessments, implementing stringent policies, developing training materials, and engaging with stakeholders and peers, HHS is taking proactive steps to mitigate risks and uphold ethical standards. As HHS continues to progress in its efforts, it remains steadfast in its commitment to promoting fair and responsible labour practices globally.

Questionnaire Response

The following information uses the Minister’s online questionnaire as the template for the report. (* Notes a response is required)

Questionnaire is located here: <https://www.publicsafety.gc.ca/cnt/cntrng-crm/frcd-lbr-cndn-spply-chns/sbmt-rprt-en.aspx#a1>

Identifying Information		
Q#	Question	HHS Response
1*	This report is for which of the following?	Entity
2*	Legal name of reporting entity	Hamilton Health Sciences Corporation
3*	Financial reporting year	FY 2023-24 (April 1, 2023 – March 31, 2024)
4*	Is this a revised version of a report already submitted this reporting year?	No
5*	For entities only: Business number(s) (if applicable)	867435497
6*	For entities only: Is this a joint report?	No
7*	For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?	No
8*	For entities only: Which of the following categorizations applies to the entity? Select all that apply.	<p>Canadian business presence (select all that apply):</p> <ul style="list-style-type: none"> • Has a place of business in Canada • Does business in Canada • Has assets in Canada <p>Meets size-related thresholds (select all that apply):</p> <ul style="list-style-type: none"> • Has at least \$20 million in assets for at least one of its two most recent financial years • Has generated at least \$40 million in revenue for at least one of its two most recent financial years • Employs an average of at least 250 employees for at least one of its two most recent financial years
9*	For entities only: Which of the following sectors or industries does the entity operate in? Select all that apply.	Health care and social assistance
10*	For entities only: In which country is	Canada

	the entity headquartered or principally located?	
10.1*	If in Canada: In which province or territory is the entity headquartered or principally located?	Ontario
11	For government institutions only: Is this a report for a federal Crown corporation or a subsidiary of a federal Crown corporation?	N/A

Annual Report: Reporting for Entities

1*	What steps has the entity taken in 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 the entity or of goods imported into Canada by the entity? Select all that apply.	<ul style="list-style-type: none"> • Conducting an internal assessment of risks of forced labour and/or child labour in the organization’s activities and supply chains • Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
2	Please provide additional information describing the steps taken (if applicable)	<p>In May 2023, HHS send a communication to our vendor community advising them our intent to take action to ensure there is alignment between HHS and our contracted vendors related to important social and economic issues, including Bill S-211.</p> <p>To accomplish these goals, in March 2024, HHS then requested vendors submit their attestation confirming they have policies, procedures, and governance structure to support each element of our Values-Bases Procurement model.</p> <p>Vendors were required to attest to the following:</p> <p style="padding-left: 40px;">In compliance with Bill S-211, the proponent attests that their organization has policies, processes, and governance structure designed to reduce and prevent the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.</p>

		<p>Further, the Goods and any services provided by the Vendor under existing Agreements 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).</p> <p>All new vendors are now required to attest to the above. Responses are logged, tracked, and managed in the HHS contract management system.</p>
3*	Which of the following accurately describes the entity's structure?	Corporation
4*	Which of the following accurately describes the entity's activities? Select all that apply.	<ul style="list-style-type: none"> • Selling goods in Canada • Importing into Canada goods produced outside Canada
5	Please provide additional information on the entity's structure, activities and supply chains	<p>HHS purchases medical supplies and equipment to provide healthcare to patients as well as goods and services required to support the infrastructure and back-office functions.</p> <p>HHS purchases directly from suppliers, distributors and manufacturers that are licensed to sell goods and services in Canada. Our supply chains include sub-contractors and third parties to our direct suppliers.</p> <p>HHS is the importer of record for the goods we purchase outside of Canada and therefore need to comply with the Customs Act.</p> <p>HHS is a member of a group purchasing organization (GPO), Mohawk Medbuy Corporation (MMC) and leverages regional and provincial contracts.</p> <p>Our GPO partner has taken the following steps to mitigate the risk of forced and child labour in our supply chains:</p> <ol style="list-style-type: none"> i. Modified standard contract language "Representation and Warranties"

		<p>section: “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).</p> <ul style="list-style-type: none"> ii. Modified competitive procurement templates to include language that 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). iii. If the GPO is made aware of any instances where forced labour or child labour exists in supply chains, they will inform TOH. iv. Developing internal policy and training for those in sourcing and supply chain roles. v. Created an ESG team to develop a sustainability and ESG practices program.
6	Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?	Yes
7	Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?	<p>Embedding responsible business conduct into policies and management systems</p> <p>See response to question 2 above for further details.</p>
8*	Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?	No
9*	Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries?	We have not identified forced labour or child labour risks related to any of the above mentioned aspects.
10	Please provide additional information on the parts of the entity’s activities	Not applicable

	and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable)	
11*	Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?	Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.
12	Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable)	N/A
13*	Has the entity 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?	Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.
14	Please provide additional information on any measures the entity has taken 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 (if applicable)	N/A
15*	Does the entity currently provide training to employees on forced labour and/or child labour?	No
16	Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable).	N/A
17*	Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?	Yes
17.1*	If yes, what method does the entity use to assess its effectiveness? Select all that apply.	<ul style="list-style-type: none"> • Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour • Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including

		by tracking relevant performance indicators
18*	Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable).	The HHS Procurement and Supply Chain Policies and SOPs are reviewed annually to ensure compliance with all legislative acts and requirements.

ATTESTATION

Prepared in accordance with the **Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”)**

TO: The Board of Hamilton Health Sciences, (the “Board”)

FROM: Ms. Tracey MacArthur
President & Chief Executive Officer
Hamilton Health Sciences

DATE: May 30, 2024

RE: April 1, 2022 – March 31, 2023 (“the Applicable Period”)

On Behalf of **Hamilton Health Sciences Corporation** (the “Hospital”), I attest to:

- I attest that the Annual Report required of the Corporation pursuant to section 6 of the Act has been completed;
- I attest that the information contained in the Annual Report has been reviewed and approved by the Board of Directors;
- In accordance with the requirements of the Act, and in particular section 6 thereof, I attest that I have reviewed the information contained in the Annual Report for the Corporation;
- 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.

In making this attestation, I have exercised care and diligence that would reasonably be expected of a Hospital CEO in these circumstances, including making due inquiries of Hospital staff that have knowledge of these matters.

Dated at **Hamilton**, Ontario this **May 30, 2024**.

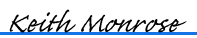

Tracey MacArthur (May 31, 2024 07:24 EDT)

Tracey MacArthur

President & Chief Executive Officer, Hamilton Health Sciences Corporation
May 30, 2024

I have authority to bind the Corporation.

I certify that this attestation has been approved by the board of the **Hamilton Health Sciences Corporation** on **May 30, 2024**.


Keith Monroe (May 31, 2024 09:36 EDT)

Keith Monroe

Board Chair, Hamilton Health Sciences Corporation
May 30, 2024

I have authority to bind the Corporation.

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