



Health Sciences North  
Horizon Santé-Nord

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## Entity Report

# Fighting Against Forced Labour and Child Labour in Supply Chains Act

For the year ended March 31, 2024

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Prepared by

Paul Truscott, Senior Vice President & Chief Operating Officer

Health Sciences North, 41 Ramsey Lake Road, Sudbury, Ontario, P3E 5J1

## Introduction

Forced labour can be found in every country and every sector. Forced labour and child labour risks occur primarily through the global supply chains of businesses. There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions doing business in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

The measures introduced in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act), came into effect January 1, 2024 and aims to increase industry awareness and transparency and drive businesses to improve practices and imposes obligation on certain government institutions and private-sector entities to report on measures taken to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains.

## Annual Report

Pursuant to section 11(1) of the Act, which requires that every entity report on the steps the entity has undertaken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of (a) the production of goods in Canada or elsewhere by the entity or (b) goods imported into Canada by the entity, we report the following:

- a) HSN did not produce goods in Canada or elsewhere during the reporting period; and
- b) HSN has had limited activities related to the importation of goods into Canada during the reporting period.

Actions taken during the reporting period specific to the above include:

- Developed anti-forced labour and/or child labour contractual clauses;
- Developed anti-forced labour and/or child labour bid response attestation language; and
- Limited procurement practices where risk may exist and a supplier warranty that the goods to be provided are not the result of, and in no way involve forced labour or child labour could not be obtained.

## Supplemental Information

Pursuant to section 11(3) of the Act, we provide the following supplemental information:

### **a) Structure, Activities & Supply Chains**

HSN is a publicly funded hospital incorporated under the laws of Ontario on June 30, 1997, governed by its Board of Directors, having Business Number 885027243. As a corporation, HSN meets the definition of an entity as prescribed by the Act.

HSN is the regional hospital for Northeastern Ontario and a leading academic health sciences centre in Canada. As the tertiary care centre with multiple sites across the region, HSN provides critical and inpatient care for more than half a million people across a variety of services and programs including cardiac care, oncology, nephrology, trauma and rehabilitation. Other services and specialties include emergency, surgical, pediatric, indigenous health, various outpatient clinics, pharmacy, diagnostic imaging and laboratory.

HSN is primarily funded by the Province of Ontario for specific services. To supplement this funding and to support operations and research activities, HSN carries on various marketed service activities, including but not limited to the selling of parking, rental of space, speciality clinics, back-office services and retail pharmacy services. It is these selling activities that result in HSN having reporting obligations under the Act.

HSN requires a broad array of goods, services and construction, primarily from Ontario and other Canadian based businesses, including but not limited to: medical equipment, medical devices, medical supplies, medical drugs, professional services, facility and maintenance services, office equipment and supplies, and food products.

HSN's supply chain activities are part of a complex and comprehensive framework that includes multiple stakeholders that facilitate procurement processes for ourselves and other public organizations. These stakeholders include peer health care organizations, group purchasing organizations, governments, shared services organizations and supplier associations.

## b) Policies and Due Diligence

HSN has embedded responsible business conduct into policies and management systems, including the below Supply Chain Code of Ethics:

***Personal Integrity and Professionalism:*** Individuals involved with supply chain activities must act, and be seen to act, with integrity and professionalism. Honesty, care and due diligence must be integral to all supply chain activities within and between Broader Public Sector organizations, suppliers and vendors. Respect must be demonstrated for each other and for the environment. Confidential information must be safeguarded. Participants must not engage in any activity that may create, or appear to create, a conflict of interest, such as accepting gifts or favours, providing preferential treatment, or publicly endorsing suppliers or products.

***Accountability and Transparency:*** Supply chain activities must be open and accountable. In particular, contracting activities must be fair, transparent and conducted with a view to obtaining the best value for public money. All participants must ensure that public sector resources are used in a responsible, efficient and effective manner.

***Compliance and Continuous Improvement:*** Individuals involved in purchasing or other supply chain activities must comply with this Code of Ethics and the laws of Canada and Ontario. Individuals should

*continuously work to improve supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share leading practices.*

As a designated Broader Public Sector Organization under the Broader Public Sector Accountability Act (Ontario) 2010, procurement practices are governed by HSN policies, the Broader Public Sector Procurement Directive (2024), along with domestic and internal trade treaties (Agreements).

Procurements undertaken by HSN, or on behalf of HSN must include a warranty from the supplier that the goods and/or services to be provided are not the result of, and in no way involve forced labour or child labour.

HSN has modified certain procurement practices where sellers are unable to provide the necessary warranties, in particular we have limited the use of large online multi-vendor, multi-tiered selling platforms.

### **c) Risks**

HSN is not aware of any instances where parts of our business and supply chains carry high risk of forced labour or child labour. We will continue to strive to identify emerging risks

### **d) Remediation Measures – Forced or Child Labour**

Pursuance to the above section (c), no measures were taken to remediate any forced or child labour.

### **e) Remediation Measures – Loss of Income to Vulnerable Families**

Pursuance to the above section (d), no measures were taken to remediate the loss of income to the most vulnerable families that resulted from actions required in section (d).

### **f) Training provided to Employees**

HSN representatives involved directing procurement activities have attended webinars and other information sessions hosted by various advocacy associations, professional associations and legal firms. Such training has included clarity regarding our obligations under the Act and guidance on preparing effective procurement documents and processes that prevent contracting with suppliers involved in forced labour and child labour.

In partnership with our Group Purchasing Organization, we have commenced planning for more targeted training for employees involved in sourcing and supply chain roles.

**g) Assessing Effectiveness**

A formal means of assessment relative to our organization has not been developed. To monitor effectiveness within our sector, HSN will continue to collaborate with the following authorities regarding the Act.

- **Provincial public sector authorities:** HSN will engage Provincial authorities that issue directives and procurement tools that support the Act.
- **Federal agencies:** Having jurisdiction over the Act, HSN acknowledges the federal government oversees enforcement agencies that play a critical role in enforcement of the Act (i.e. Canada Border Services Agency).
- **National and international monitoring / reporting agencies:** HSN will engage procurement sector associations that play a critical role in the education and training of our procurement professional.

HSN will work with those stakeholders and partners that conduct procurement activities on our behalf to ensure that they have in place the appropriate policies, processes, tools and systems to conduct the procurement processes in compliance with the Act, including an annual attestation validating same.

**Attestation**

In accordance with the requirements of the Act, and in particular section 11 paragraph (4)(a) thereof, 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.

Full name: David McNeil  
 Title: President and Chief Executive Officer  
 Date: June 4, 2024



Signature:

I have the authority to bind Health Sciences North