

BILL S-211: An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff

Organization Report for the Fiscal Year ended March 31, 2024

This report is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This report outlines the approach and initiatives by Hotel Dieu Grace Healthcare (“Hospital”) to identify and address the risks forced labour and child labour in its business operations and supply chains during the financial year commencing April 1, 2023 and ending March 31, 2024.

Legal Structure

The Hospital is incorporated without share capital under the laws of Ontario. It is a post-acute care community hospital and is a registered charitable organization.

Supply Chain

The Hospital sources medical devices, medical and surgical supplies, and pharmaceuticals and supplies through a network of domestic and global healthcare suppliers. It is a member of healthcare specific buying groups and works closely with a strategic sourcing partner. Its supply chain includes vendors with established Canadian operations and those that source inputs and manufacture and distribute goods in countries around the world.

Risks in Supply Chain

The Hospital is working to identify specific risks of forced labour and child labour that may exist in its supply chain. It recognizes that these risks include but may not be limited to:

- Product substitutions required due to supply chain disruption.
- Multi-jurisdiction supply chain for inputs required to manufacture medical, surgical and pharmaceutical supplies, and equipment.
- Price sensitivity resulting from public funding environment and shortfalls such that reduced forced labour costs cause a product to be priced more attractively.

Actions Taken

To date, the Hospital has worked with its strategic sourcing partners and buying group organizations to ensure appropriate measures are in place for vendors to meet the requirements under Bill S-211 in competitive and non-competitive procurements. These measures include:

- Inclusion of standard representations and warranties in contract language; and
- Modification of competitive procurement documents (e.g. RFPs) to require

vendor attestation of being in compliance with Bill S-211.

Additionally, the Hospital maintains employee policies that set forth the duties, responsibilities, and expectations of employment and business conduct. This includes, but is not limited to, details on the policies and procedures that help employees operate safely, ethically, and effectively in all roles and in compliance with provincial employment standards, human rights and occupational health and safety legislation.

Actions to be Undertaken

Looking forward, the Hospital is working towards the following:

Development of:

- internal training for employees involved in strategic sourcing within and on behalf of the Hospital;
- internal policy related to procurement and vendor relationships to address the requirements under Bill S-211;
- risk assessment tools to be used as part of competitive and non-competitive procurement processes; and
- effectiveness assessment tools to ensure the Hospital is monitoring its compliance with the requirements of Bill S-211.

Employee Training

The Hospital did not provide employees with forced and child labour-focused training in 2023. However, as above, it is working towards developing internal training for employees involved in strategic sourcing.

Remediation Measures

The Hospital has not identified any forced labour or child labour in its activities or supply chains and so remediation has not been assessed.

Effectiveness Assessment

The Hospital's strategic sourcing partner has significant expertise in supply chains. The Hospital has leveraged this expertise to help it assess the effectiveness of existing measures to address forced and child labour, and to identify particular areas of risk.

ATTESTATION

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities 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.

Ken Blanchette

Full name

Board Chair

Title

June 5, 2024

Date

A handwritten signature in black ink, appearing to read 'K. Blanchette', with a long horizontal line extending to the right.

Signature

I have the authority to bind Hotel Dieu Grace Healthcare