

Briefing Note: Bill S-211 an Act to Enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Date: April 29, 2024

Prepared for Board of Directors

Background

Bill S-211 an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) 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.

This enactment also amends the Customs Tariff to allow for a prohibition on the importation of goods manufactured or produced, in whole or in part, by forced labour or child labour as those terms are defined in the Act.

Lake of the Woods District Hospital (LWDH) is a non-profit health care provider operating as a corporation in the province of Ontario, governed by its Board of Directors. LWDH purchases a broad array of goods, services, and construction. LWDH falls within the prescribed definition of a reporting Entity under the Act.

Response to Reporting Requirements

LWDH uses a shared services organization, Mohawk Medbuy, for many purchasing activities. Mohawk Medbuy is taking action to modify their contract language and its competitive procurement templates. Mohawk Medbuy is not aware of any instances where forced labour or child labour exists in current supply chains and is committed to sustainability practices.

LWDH is committed to ensuring that there is no forced labour and child labour in our supply chains or in any part of our business. The Act aligns with the business culture of our organization, which includes the supply chain code of ethics.

Supply Chain Code of Ethics

I. Personal Integrity and Professionalism

- *All individuals involved with purchasing or other supply chain-related 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 (BPS) organizations, suppliers and other stakeholders.*
- *Respect must be demonstrated for each other and for the environment.*
- *Confidential information must be safeguarded.*
- *All 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.*

II. Accountability and Transparency

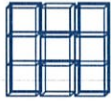
- *Supply chain activities must be open and accountable. In particular, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for public money.*
- *All participants must ensure that public sector resources are used in a responsible, efficient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

III. Compliance and Continuous Improvement

- *All individuals involved in purchasing or other supply chain-related activities must comply with this Code of Ethics and the laws of Canada and Ontario.*
- *All 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.*

LWDH's supply chain code of ethics aligns with the Act and its supply chain management group has implemented additional language and templates in response to the Act.

**Prepared by Kelsey Geisel, CPA, CA
Director of Finance & CFO**



Approval and Attestation

Bill-211 Act to Enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act

From: The Board of Directors (the "Board") of the Lake of the Woods District

Date: May 9, 2024

Re: January 1, 2023 to December 31, 2023

The Board has authorized me, by resolution dated May 9, 2024, to declare and attest to you as follows:

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.

I have the authority to bind the Lake of the Woods District Hospital.

Brent Lundy
Board Chair
Lake of the Woods District Hospital
May 9, 2024

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



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