

Providence Care

PROVIDENCE CARE CENTRE OPERATING AS PROVIDENCE CARE

Forced and Child Labour Report
April 1, 2023 to March 31, 2024



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Introduction

This Report has been prepared in accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“the Act”) in relation to the fiscal year from April 01, 2023 to March 31, 2024.

This Report was developed following consultation with relevant Providence Care personnel and personnel from Mohawk Medbuy Corporation (MMC), and outlines actions taken by Providence Care during the fiscal year to prevent and reduce the risk of forced and/or child labour within its operations and supply chains.

Providence Care is committed to respecting human rights as a fundamental principle in our operations.

This Report has been approved by Providence Care’s Board of Directors.

Structure, Activities, and Supply Chains

Structure

Providence Care Centre, operating as Providence Care is incorporated as a corporation without share capital under the laws of Ontario. The registered Office of the Corporation is 752 King Street West, Kingston, ON K7L 4X3.

Additional information about Providence Care, including its annual reports and audited financial statements, is available at providencecare.ca.

Activities

Continuing the legacy of the Sisters of Providence of St. Vincent de Paul, Providence Care consists of Providence Care Hospital, Providence Transitional Care Centre, Providence Manor long-term care home, Hospice Kingston, and more than 22 community based mental health and support services across the region.

Fully-affiliated with Queen’s University and St. Lawrence College, Providence Care is a member of the Ontario Hospital Association, and is a centre for healthcare, education and research. Providence Care is more than healthcare; Providence Care promotes independence, enhances quality of life and redefines traditional healthcare through partnerships, innovation and research.

With over 1,875 staff, 130 physicians, 620 volunteers, and an annual operating budget of approximately \$180 million, Providence Care is Southeastern Ontario’s leading provider of specialized care in aging, mental health and rehabilitation.

Supply Chain

Providence Care’s supply chain activities include purchasing a broad range of goods and services from international, national, regional, and local suppliers.

Providence Care relies on a third-party, Mohawk Medbuy Corporation (MMC), for a majority of its supply chain activities. MMC is a national, not-for-profit, shared services organization trusted by hundreds of Canadian hospitals and health care providers to drive value, efficiencies, legal compliance, and cost savings on the supplies and services they use. MMC is an entity under the Act and subject to its own reporting obligations.

MMC is required to manage Providence Care's supply chains, including competitive procurement processes (such as Requests for Proposals) and contracts, in a way that complies with all legislation and is consistent with fair and ethical business practices.

Items procured by Providence Care fall into two major categories:

- Equipment and supplies which include medical, mechanical, office, infrastructure, technology and safety equipment/supplies.
- Services which includes a variety of agreements such as those for maintenance and repair on equipment; construction services for maintenance, repair, and development of the hospital's infrastructure; and landscaping and groundskeeping services, including snow removal and lawn/garden care services.

Policies and Due Diligence

There are several policies, processes, and practices across Providence Care which minimize the risk of forced labour and/or child labour practices in our operations and within our supply chains.

Policies

Providence Care maintains a comprehensive policy framework focused on promoting legal and ethical business practices within our operations, and our supply chains.

Code of Conduct

Our Code of Conduct affirms that Providence Care is committed and dedicated to maintaining a respectful workplace environment in which the inherent dignity and worth of every person is recognized and respected. All those associated in any way with the organization have both the right to be treated and the responsibility to treat others with respect and dignity at all times. It is understood and expected that the organization has an obligation by way of having in place processes, policies and resources to enable and support health care and service providers to do their work in an environment that does not contribute to or exacerbate behaviour that is inconsistent with the Code of Conduct.

Conflict of Interest

Our Conflict of Interest policy requires personnel or affiliates to avoid situations whereby they are in a position in which their personal interest may compromise or be in conflict with the best interests of Providence Care, its clients, or other personnel/affiliates.

Ethics Framework

Our Ethics Framework enables Providence Care to nurture its organizational integrity by ensuring congruency between its values and its actions. The core pillars of our Ethics Framework are

consultation, education, and policy in the arenas of Clinical, Research, Organizational, and Governance Ethics

Age of Employment

Our Age of Employment policy outlines the minimum age restrictions for students and employees at Providence Care along with policies and procedures to ensure compliance. In accordance with the policy, students must reach a minimum age of 15 years with all other employees being a minimum of 18 years old.

Signing Authority

Our Signing Authority policy ensures the appropriate level of authority is obtained for all operating, capital and business transactions and that these decisions are consistent with the strategic plan, hospital policy and budget, and in compliance with legislation. This policy commits Providence Care to:

- use of MMC as its primary contracting agent for procurement of goods and services (with some exceptions) and will utilize Group Purchasing Organizations (GPOs) where appropriate;
- compliance with Ontario's Broader Public Sector Procurement Directive (BPSPD) which ensures that publicly funded goods and services are acquired through a process that is open, fair, and transparent, and establishes a Supply Chain Code of Conduct that Broader Public Sector (BPS) organizations must follow; and
- compliance with the *Building Ontario Businesses Initiative Act* (BOBI) which requires BPS organizations to contribute to the growth of Ontario business by providing for circumstances in which public sector entities are required to give Ontario businesses preferential scoring when conducting procurement initiatives for goods and services over a specified threshold amount.

Whistleblowing

Our Whistleblower Policy assists personnel and affiliates to report concerns regarding significant and serious matters related to the business operations of Providence Care with the goal of endorsing a proactive environment of disclosure and protection to ensure that Providence Care meets legislative requirements and aligns to the guiding principles of transparency and accountability.

Providence Care is committed to operating in a manner that reflects honesty, integrity and ethical business practices and encourages good faith reporting of allegations of wrong doing in business conduct including but not limited to:

- Breach of the law and/or legal obligations;
- Gross mismanagement including omissions and/or neglect of duty;
- Breach of fiduciary responsibilities (the duty to act in the best interests of Providence Care);
- Breach or inappropriate financial reporting and use of funds or organizational assets;
- Abuse of authority;
- Unethical business conduct;
- Endangering the health and safety of others.

If a person reasonably believes that they have information about an inappropriate behaviour or activity that could show that a wrongdoing has been committed, or is about to be committed, the person may report this concern to the Authorized Disclosure Officer.

Due Diligence

Operations

Providence Care's commitment to respecting human rights is embedded in our corporate policies and practices. In our operations, we do not utilize forced or compulsory labour and forbid child labour in our workforce.

Providence Care employs individuals who may be under the age of 18 in specific positions (Patient Assistant, Patient Assistant Coach) that are designated for students who are attending secondary or post-secondary school. All other positions within the organization require individuals to be a minimum age of 18.

A majority of our employees are highly skilled and trained professionals including nurses, allied health professionals, and administrative staff. Eighty-eight percent (88%) of our workforce is represented by trade unions with their terms and conditions of employment negotiated and outlined in collective agreements.

We believe that the risk of forced labour and/or child labour among our personnel is exceptionally low.

Supply Chains

As an MMC member, Providence Care relies upon the efforts of MMC for the purposes of managing and monitoring its supply chain operations and compliance programs. MMC is subject to its own reporting requirements under the Act.

MMC provided its membership a letter of attestation, outlining its compliance with the Act. MMC confirmed that during the reporting period, it took steps to reduce the risk of forced and/or child labour, including but not limited to:

- Modified competitive procurement templates (e.g. RFP), to include language that suppliers/vendors bidding for Hospital business must attest to the following:
“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.”
- Modified standard contract language to include the following in Representation and Warranties that the successful supplier/vendor must agree to:
“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.”

MMC formalized its commitment to sustainability and Environmental, Social, & Governance (ESG) practices through the creation of a dedicated ESG team. This group is responsible for program development to ensure MMC's ongoing sustainability, and to support its members as an enabler of a cohesive, sustainable health care supply chain.

MMC has advised its members that it has not been made aware of any instances where forced labour and/or child labour exists in current supply chains, but should such instances become known, MMC will inform its membership.

Going forward, over the coming reporting periods, MMC is planning iterative improvements to the activities undertaken relative to the Act and health care supply chains. These include the development of internal policy and training for those in sourcing and supply chain roles.

Providence Care and MMC comply with the BPS Procurement Directive and BOBI, which in turn reduces the risk of forced labour and/or child labour in its supply chains.

Supply Chain Risks

With the enactment of the Act, Providence Care has a plan to go forward, in partnership with MMC, to minimize the risk of forced and/or child labour in our supply chains.

Volatility in Global Supply Chains

Supply chain volatility during the COVID-19 pandemic led to many vendor amalgamations over the past several years, resulting in reduced availability of many preferred products, and in some cases, the elimination of entire product lines. In order to ensure patient care is not compromised, off-contract vendor substitutions have become commonplace. Although substitutions are approved for sale in Canada, it is difficult to discern their country of origin.

Existing Contracts

Vendor and supplier contracts that were in existence prior to the Act coming into effect do not have standardized forced labour and/or child labour attestation language built into them. This risk will continue until existing contracts expire and are renewed or replaced.

Remediation Measures

We did not identify any instances of forced labour and/or child labour in our operations or supply chains during the reporting period. In the event that Providence Care is informed of, or discovers, the potential or confirmed presence of forced and/or child labour in its operations or supply chains, Providence Care will ask the company to investigate and take appropriate remedial measures.

Loss of Income

As Providence Care did not identify any instances of forced labour and/or child labour in its operations or supply chains, no measures were taken to remediate the loss of income to the most vulnerable families that resulted from measures taken to eliminate the use of forced labour and/or child labour.

Training

During the reporting period, Providence Care provided awareness materials on the Act to the following groups/persons:

- Board of Directors;
- Senior Leadership Team;
- Leaders heading the Supply Chain and Procurement functions, Finance function, Human Resources function, Policy Governance and Quality & Risk function.

During the reporting period, mandatory computer-based training was available to all Providence Care employees on the Code of Conduct Policy.

Assessing Effectiveness

As referenced throughout this report, Providence Care has introduced certain measures over the last fiscal year aimed at reducing the risk that forced labour and/or child labour used in its activities and in its supply chains. It has not yet taken any measure to assess the efficiency of such measures.

Approval and Attestation

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 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 Forced and Child Labour Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year dated April 1, 2023 to March 31, 2024.

I have the authority to bind the corporation:

Michele Podhy
Board Chair

Cathy Szabo
President & Chief Executive Officer