



## **FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT**

**RIVERVIEW HEALTH CENTRE INC.'S ANNUAL REPORT FOR APRIL 1, 2023 –  
MARCH 31, 2024**

### **Introduction**

This annual report has been prepared pursuant to Riverview Health Centre Inc.'s (Riverview Health Centre) responsibilities and requirements under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act").

Riverview Health Centre determined it is an "Entity" as defined in the Act and therefore required to report on the organization's activities to mitigate the risk of forced labour and child labour being employed within its supply chain and its activities.

The Act came into force on January 1, 2024. This annual report is the first completed pursuant to the Act by Riverview Health Centre.

### **Structure**

Riverview Health Centre is a registered charity, incorporated under the Corporations Act of Manitoba without share capital, and is governed by applicable provincial health statutes and guidelines.

Riverview Health Centre operates a hybrid long-term care facility, which includes the delivery of acute care services related to neuro rehabilitation and palliative care. Its long-term care services include personal care home, respiratory chronic care, and long-term ventilator care.

Riverview Health Centre utilizes supply chain management shared services ("SCMSS") provided by Shared Health, a health authority, designated as the provincial health authority, and which has continued as a corporation under *The Health System Governance and Accountability Act* (Manitoba).

SCMSS enables the efficient acquisition of products, equipment and services to achieve the best overall value considering cost, quality and outcomes. The range of services includes strategic sourcing, contracting, value analysis, procurement and distribution/logistics. SCMSS works in collaboration with certain health organizations across Manitoba.

Provincial clinical programs led by Riverview Health Centre are located at Riverview.

Riverview Health Centre also participates as a proxy member of HealthPro, a large national health care group purchasing organizations, alongside hospitals, provinces and shared service organizations from across Canada, through the direct membership of the Winnipeg Regional Health Authority (WRHA).

### **Riverview Health Centre Activities**

Riverview Health Centre has determined it is engaged in the production, sale, importing, and distribution of goods as follows:

1. Food services:
  - a. Riverview Health Centre contracts with a food management service to operate an onsite cafeteria, where food/beverages are assembled by its staff and then sold to the public.
  - b. Riverview Health Centre provides an onsite meal service in Manitoba, where its staff heat pre-prepared meals and then distribute them to patients and residents.
2. Gift Shop:
  - a. Riverview Health Centre, on a retail basis, purchases goods solely from Canadian wholesales/distributors for resale to patients, residents, staff, and visitors to the health facility.
3. Pharmacy compounding of medications:
  - a. Riverview Health Centre, through WRHA's Clinical Pharmacy Program staff, compounds medications that are not sold, but are used as part of the overall care delivery to patients and residents.
4. Importing:
  - a. To support its clinical programs, Riverview Health Centre purchases goods produced outside Canada from third party suppliers, where that third party is considered to be the importer for the purposes of the *Customs Act*, but understands such is not considered importing under the Act.
  - b. However, Riverview Health Centre on as needed basis imports goods from distributors, with the assistance of a customs broker as needed, if its existing suppliers cannot provide the goods. This importing mostly applies to medical supplies and generally such is imported from the United States.

### **Supply Chain Underlying Riverview Health Centre Activities**

The WRHA is an active member of HealthPro which is a national group purchasing organization. Through the WRHA's membership, Riverview Health Centre receives the benefits of HealthPro's competitive bid processes and managed contracts.

SCMSS is a shared administrative service under Shared Health, which provides certain shared administrative services to health authorities, including the Winnipeg Regional Health Authority, of which Riverview Health Centre is a member organization.

Currently, the only fully centralized supply chain services are in Winnipeg and therefore, SCMSS is only responsible to lead the competitive bids processes and/or establishing contracts with suppliers for Riverview Health Centre, Shared Health (for its operations in Winnipeg and elsewhere in Manitoba), the Winnipeg Regional Health Authority (“WRHA”), and certain health corporations that operate hospitals in Winnipeg.

As a result, each health authority outside of Winnipeg is responsible for purchasing products, services, and equipment directly from suppliers. Generally, these purchases are made from contracts established by SCMSS with these suppliers, however, there may be some exceptions.

Approximately 30% of Riverview Health Centre’s goods and equipment contracts are committed to HealthPro agreements and approximately 95% of Riverview Health Centre’s pharmacy contracts are committed through HealthPro agreements.

Riverview Health Centre’s activities are as follows:

1. For the onsite cafeteria operations, Riverview Health Centre relies on its management contractor to source, supply, and deliver the raw materials that are used to produce the food/beverages that are sold by Riverview Health Centre. SCMSS does not assist the management contractor with those efforts. A description of the direct and indirect suppliers that contribute goods/services to the goods produced and sold through the cafeteria, and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.
2. For the onsite meal service, Riverview Health Centre relies on the WRHA’s Regional Distribution Facility to produce and then distribute the pre-prepared meals, which Riverview Health Centre then heats and distributes to patients and residents. However, SCMSS is responsible to lead the competitive bid processes and/or contracting with suppliers to supply and deliver the raw materials used by the WRHA’s Regional Distribution Facility to produce the pre-prepared meals. A description of the direct and indirect suppliers that contribute goods/services to the goods produced and distributed through Riverview Health Centre’s onsite meal service and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.
3. For the onsite gift shop activities, where products are purchased solely from Canadian suppliers, a description of the direct and indirect suppliers that contribute to the goods produced and distributed, and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.
4. SCMSS infrequently is responsible to lead the competitive bid processes and/or contracting with suppliers for the raw materials used to produce medications that

are not sold but used for patient and resident care. For a majority of its Pharmacy Program needs, Riverview Health Centre relies on HealthPRO to issue competitive bid processes for these raw materials and thereafter, Riverview Health Centre together with other health care organizations enter a contract with the selected suppliers that are managed by HealthPRO. As described above, approximately 95% of Riverview Health Centre's pharmacy contracts are committed through HealthPRO. A description of the direct and indirect suppliers that contribute goods/services to the goods produced through Riverview Health Centre's Pharmacy Program and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.

5. Riverview Health Centre, with the assistance of a customs broker, on an as-needed basis imports goods from a distributor if Riverview Health Centre's existing suppliers cannot provide them. This importing mostly applies to medical supplies and generally such are imported from the United States. A description of the direct and indirect suppliers that contribute goods/services to the goods imported by Riverview Health Centre and a more detailed description of the source countries/regions of those goods/services, was not able to be ascertained for this annual report.

#### **Steps Taken in Previous Financial Year (April 1, 2023 – March 31, 2024)**

Riverview Health Centre had not taken steps during the previous financial year to prevent and reduce the risk that forced labour or child labour was used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada by Riverview Health Centre.

#### **Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour**

Riverview Health Centre does not currently have any policies or due diligence processes (as described in the *OECD Due Diligence Guidance for Responsible Business Conduct*) in place related to forced labour or child labour. However, Riverview Health Centre has hiring procedures that are designed to maintain compliance with federal immigration legislation and provincial employment legislation which addresses one form of child labour as defined in the Act i.e., *labour or services provided or offered to be provided by persons under the age of 18 years and that are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada.*

Riverview Health Centre's hiring procedures are designed to maintain compliance with federal immigration legislation that requires permanent residency, citizenship, or a permit to work in Canada or the pending application for the same, and provincial legislation where Riverview Health Centre must register to employ any foreign worker other than a Manitoba Provincial Nominee.

All prospective employees of Riverview Health Centre including staff recruited for food and pharmacy services are recruited by advertising job opportunities on various career websites as well as the WRHA/Riverview Health Centre career website. Prospective employees are required to respond to the question “Are you legally authorized to work in Canada?” and the answer options are: “a) authorized to work for any employer, b) authorized to work for my present employer only, c) I require sponsorship to work in this country”. As part of the internal controls of Riverview Health Centre, applicants are required to accept an acknowledgement that states:

*I understand that I am applying for employment within a site or service represented on the Winnipeg Regional Health Authority (WRHA)/Riverview Health Centre careers website. All information I provide as part of the application process is true and correct, and not misleading in any way. I understand that elements of my application may be checked, including references from prior employers, job history, education, and other qualifications and information provided by me. If it is found that I have misrepresented myself, my application may be disqualified; if I have been awarded a position, my employment may be terminated, regardless of how much time has elapsed. If I am offered employment, I will be required to supply satisfactory background checks as described in the written employment contract.*

As a general practice, Riverview Health Centre does not employ people under the age of 18 years. However, Riverview Health Centre cannot prohibit employing persons that are under the age of 18 years as that would be considered age discrimination. Riverview Health Centre has hiring procedures that are designed to maintain compliance with *The Employment Standards Code* (Manitoba) which non-exhaustively requires:

1. To not employ a person under the age of 13 years.
2. To employ a person that is 13 years or older but less than 16 years old requires a Work Readiness Certificate and/or a Child Employment Permit. The Work Readiness Certificate would certify they completed the Young Worker Readiness Certificate Program which pertains to labour rights and safety and include a signed consent of their parent to the employment.
3. To not employ a person under the age of 16 years between 11:00pm and 6:00am or for more than 20 hours during a week of school.

As per Section 4.1 of WRHA Regional Policy #20.30.040 (Security Checks for Employment), which has been adopted in its entirety by Riverview Health Centre, all new hires are required to complete a criminal records check (including vulnerable sector search), adult abuse registry check, and child abuse registry check (“Security Checks”). In Riverview Health Centre’s screening processes, the age of a worker (and the corresponding obligations/restrictions for employing same under *The Employment Standards Code* (Manitoba) would be identified when reviewing the Security Checks. Section 4.4 of WRHA Regional Policy #20.30.040 (Security Checks for Employment), provides if an applicant must commence employment before the Security Checks are obtained and provided to Riverview Health Centre, the letter of offer to the applicant will

contain a statement that the offer of employment is conditional on the return of satisfactory security check(s), as required, and the failure to return same on or before the date specified could result in the immediate termination of employment for cause.

**Forced Labour and Child Labour Risks**

Riverview Health Centre did not start the process of identifying parts of its activities and supply chains that carry a risk of forced labour or child labour being used in the previous financial year.

**Remediation Measures/Remediation of Loss of Income**

Riverview Health Centre did not undertake any measures to remediate any forced labour or child labour in its activities and supply chains in the previous financial year.

Riverview Health Centre had also not 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.

**Training on Forced Labour and Child Labour**

Riverview Health Centre does not currently provide training to employees on forced labour and/or child labour.

**Policies and Procedures Assessing Effectiveness**

Riverview Health Centre has no policy or procedure in place at this time to assess its effectiveness in ensuring forced labour and child labour are or are not being used in its activities and supply chains.

*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 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 Riverview Health Centre Inc.

Name: Murray Kilfoyle

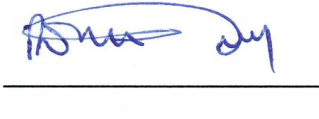
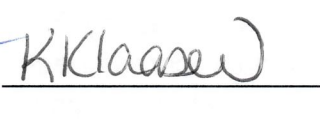
Kathleen Klaasen

Romeo Daley

Title: Board Chair

Chief Executive Officer

Chief Financial Officer



Date: May 28, 2024

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