

## **Attestation Form**

Prepared in accordance with Bill S211, Section 11.1 – Supply Chain Accountability Act

To: The Board of Sault Area Hospital (the "Board")

From: Ila Watson

President and CEO – Sault Area Hospital

Sector/Industry: Health Care and Social Assistance

Date:

Re: January 1, 2024 to March 31, 2024 ("the Applicable Period")

## **Prelude:**

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.

This report outlines steps taken by Sault Area Hospital (SAH) to demonstrate compliance with the Act.

## **Entity Information:**

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Reporting Entity's Legal Name: Sault Area Hospital
Financial Reporting Year: 2023-2024 (Q4)
Identification of a Revised Report: Not Applicable
Identification of a joint report: Not Applicable
Identification of reporting obligations in other jurisdictions: Not Applicable
Entity categorization according to the Act: Entity



Location: Sault Ste. Marie, Ontario, Canada

Description of the steps taken to prevent and reduce risks of forced labour and child labour, as per subsection 11(1):

Subsection 11(1) provides that an entity must describe the steps it has taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.

On behalf of the Sault Area Hospital (the Hospital) I attest to:

Supplementary information addressing each of the seven requirements in subsection 11(3).

As per subsection 11(3), an entity must provide information on each of the following:

i. Its structure, activities and supply chains

SAH is a non-profit corporation proving health care services primarily to Sault Ste. Marie and surrounding area. SAH falls within the prescribed definition of a reporting Entity under the Act.

In order to provide health care services, SAH purchases a broad array or goods and services from both Canada and around the world. For the most part, SAH is not the importer of goods that come from outside Canada. Goods and services include, but are not limited to: professional services, medical supplies, medical equipment, office supplies, software and hardware, and food products.

ii. Its policies and its due diligence processes in relation to forced labour and child labour

During F2024/25 SAH will work to amend and/or create policies and procedures to ensure there is no forced or child labour in our supply chains.

iii. The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk

SAH has not yet carried out a formal risk assessment and will work towards this goal. In reviewing the current inventory of supplies, SAH has products manufactured in countries that are or may have been associated with forced or child labour in the past. At this time SAH does not have a way validate if these products are associated with forced or child labour. Per section iv. (below) SAH is focusing current efforts on procurement so that we can ensure the supply chain going forward is free from forced or child labour.

iv. Any measures taken to remediate any forced labour or child labour



SAH is updating both our RFP Proponent Attestation Form and Contract template with additional language related to preventing and reducing the risk of forced or child labour used by suppliers or in their supply chains.

Addition to RFP Proponent Attestation Form:

 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 involved, forced or child labour (as such terms are defined in Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act).

Additional supplier representation and warranties in the Agreement:

 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);

SAH also sought compliance with the Act from membership Shared Service Organizations (SSO's):

- Mohawk Medbuy Corporation
- HealthPro
- v. Any measures taken 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

SAH has not taken any remediation measures.

vi. The training provided to employees on forced labour and child labour

SAH will be developing training materials in F2024/25 in order to conduct training for the Procurement staff. In the future, training can be expanded to our leadership team and others who are directly involved in the procurement of goods and services.

vii. How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

Once policies and procedures are updated and controls/measures are put in place, SAH will work to evaluate the effectiveness of the controls/measures.

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.

Dated at Sault Ste. Marie, Ontario this 29th day of May, 2024.



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Ila Watson President and CEO Sault Area Hospital

I certify that this attestation has been approved by the Board of the Sault Area Hospital on May 292024.

Lisa Bell-Murray

Chair of the Board