



2023 - 2024 Report

Fighting Against Forced Labour and Child Labour in Supply Chains Act

A Message from the Executive Leadership Team

Southlake Regional Health Centre is committed to protecting human rights and stands against modern slavery. We strive to develop and implement policies and practices that support this initiative to avoid forced labour and child labour in our activities and supply chains.

This report is made pursuant to the Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("the Act") for the fiscal year 2024.



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Our structure, activities, and supply chains

Southlake Regional Health Centre (“Southlake”) is incorporated without share capital under the laws of the Province of Ontario, and operates a public hospital pursuant to the *Public Hospitals Act*.

With an operating budget in excess \$500 million and a team of nearly 6,000 staff, physicians, volunteers, students, and Patient and Family Advisors, Southlake delivers a wide range of healthcare services in Newmarket, Canada to the communities of northern York Region and southern Simcoe County.

Southlake operates approximately 500 beds to provide leading patient care programs in Emergency, Families and Babies (Maternal Child), Clinics, Medicine, Mental Health, Surgery, Imaging, Pharmacy, and Laboratory with advanced regional programs for Cancer Care and Cardiac Care, that serve patients throughout the northern Greater Toronto Area and into Simcoe-Muskoka.

Southlake procures a wide range of goods and services through Mohawk Medbuy Corporation (“MMC”), a not-for-profit third-party shared service organization (“SSO”) for Canadian healthcare sector members. Contracts procured through this process include food services, office supplies, retail leases, and the purchase of medical supplies and equipment. In addition, Southlake has agreements with a Group Purchasing Organization (“GPO”), HealthPRO that include contracts for medical supplies and services. Alternatively, Southlake makes direct purchases from vendors for its sale of goods in its retail gift shop.

Our policies, due diligence processes, and training

Southlake's expectation is that all staff, medical staff, students, volunteers, and members of the Board of Directors comply with our policies and practices. These policies are easily accessible on the intranet. Through orientation and annual training, Southlake highlights departments and resources that facilitate such compliance. Relevant policies that outline expectations and support our efforts to identify, evaluate, and monitor unethical practices include the following:

- Our **Procurement-Corporate Policy** ensures that Southlake's procurement practices complies with applicable legislation;
- Our **Supply Chain Code of Ethics Policy** places an obligation on all individuals involved in purchasing and supply chain related activities to comply with the laws of Canada, engage in leading practices, and continuously improve procedures;
- Our **Code of Conduct Policy** ensures that the organization and its staff abide by ethical standards. Staff can report conduct that is in violation of the Code;
- Our **Whistleblower Reporting Policy** allows any individual including members of the public to make a confidential and anonymous report about any ethical or legal concerns;
- Our **Integrated Ethics Framework** is a decision tool to support ethical behaviour and practices throughout the organization; and
- Our **Equity Diversity and Inclusion Department** has a range of resources that support the organization's ability to identify inequities and foster awareness of human dignity and rights.

Risk in our supply chain

Southlake has reviewed its activities. No practices of forced labour or child labour have been identified. Furthermore, we have not identified any loss of income to the most vulnerable families that resulted from any measure taken to eliminate the use of forced labour or child labour in its activities.

The management of Southlake's supply chain is primarily outsourced to our SSO and GPO. Accordingly, Southlake does not supervise or control either organization and is, therefore, subject to their disclosure of and independent decisions regarding remediating any risks of forced labour or child labour. These are highlighted on the following page.

Southlake will continue to review our practices and engage our outsourcing organizations to ensure appropriate measures and increased actions are taken if forced labour and child labour are identified in the future.

Remediation measures

Southlake's contracts are negotiated and executed with an obligation on all parties to comply with applicable law. Where there is concern of non-compliance to The Act, Southlake has the contractual obligation to terminate the agreement.

Organizational policies and forms are reviewed and updated to reflect legal requirements. Similarly, Southlake annually reviews its legislative accountabilities. Each accountability is owned by the relevant Director. Legislative compliance is then reported to the Executive Leadership Team and the Board of Directors for review and approval.

Direct purchasing practices are regularly reviewed by Southlake's Purchasing and Distribution Department in collaboration with our shared service organization to ensure that vendors or suppliers do not have forced or child labour in their supply chain or business practices.

Our shared service organization, MMC has attested to their compliance and have taken the following steps in our procurement process:

- a) 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)

b) 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);

The Group purchasing organization, HealthPRO has confirmed the following actions taken to reduce the risk of forced and child labour in contracts:

a) In the RFP process, suppliers are provided with question scores based on how well their public-facing commitment address specific indicators of forced labour; and

b) Suppliers will be questioned on their reporting experience and continuous reporting measures taken to address forced and child labour in all levels of their supply chain.

Southlake understands that forced and child labour are international issues found in global supply chains that adversely impact human rights. The practice of importing and distributing goods creates risks of exploitation for vulnerable individuals. To reduce these impacts, Southlake will continue to work towards embedding responsible business conduct in our policies and processes.

Measures to assess effectiveness

Southlake's Integrated Risk Management Program is a framework that provides guidance and tools designed to identify, evaluate, and monitor risks. Each risk has an owner responsible for an action plan dedicated to either mitigate or eliminate the risk. This risk assessment will be used to monitor any concerns pertaining to forced labour and child labour in its activities or supply chain.

Attestation

This report has been approved by Southlake Regional Health Centre's Board of Directors on May 23, 2024.

In accordance with the requirements of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this 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.

Name: Andrew Tamlin

Title: Treasurer of Southlake Regional Health Centre's Board of Directors

Signature: 

I have authority to bind Southlake Regional Health Centre

Name: Paul Woods

Title: President & CEO






Signature: 

I have authority to bind Southlake Regional Health Centre

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