



Report for the Fighting against Forced Labour and Child Labour in Supply Chains Act

St. Joseph's Villa Dundas owned and operated by St. Joseph's Health System

Prepared 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

To: The St. Joseph's Hamilton Joint Board of Governors (the "Board")

From: John Woods, President

St. Joseph's Villa Dundas owned and operated by St. Joseph's Health System

Date: May 31, 2024

Reporting Period: Financial Period January 1, 2023 – December 31, 2024

On behalf of St. Joseph's Villa Dundas, owned and operated by St. Joseph's Health System, 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.

A handwritten signature in blue ink that reads "John Woods". The signature is stylized, with a large "J" and "W" and a cursive "o" and "d".

John Woods

President, St. Joseph's Villa Dundas owned and operated by St. Joseph's Health System

I have the authority to bind St. Joseph's Villa Dundas owned and operated by St. Joseph's Health System



Barbara Beaudoin

Chair of the Board

I certify that this attestation has been approved by the St. Joseph's Hamilton Joint Board of Governors on June 27, 2024

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Executive Summary

This annual report outlines the approach and initiatives by St. Joseph's Villa Dundas (SJVD) owned and operated by St. Joseph's Health System, to identify and address the risks of forced labour and child labour in its business operations and supply chains.

This report is made pursuant to Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the "Act")* and is prepared in compliance with Section 11 of the Act for the financial reporting year of 2023.

SJVD is deeply committed to upholding human rights and ensuring ethical practices throughout its operations, including its supply chain. This includes ensuring that the organization respects human rights, a commitment that is reflected in SJVDs internal policies and other provincial and regional legislation, such as Ontario Human Rights Code and Employment Standards Act, 2000 (ESA).

In alignment with the core values of SJVD, and in response to the imperative set forth by Bill S-211, by completing the report, SJVD hereby confirms its compliance and enforcement of Bill S-211 to prevent and reduce the risk of forced labour or child labour in its supply chain. SJVD understands the process of fighting against forced labour and child labour in supply chains is complex and evolving. Hence, the adoption of the Act requires execution of ongoing and iterative processes across the SJVD organization. As such, SJVD will continue to explore opportunities to improve and enhance supply chain transparency, and to develop policies and training programs for its employees.

Section 1: Structure, Activities and Supply Chain

Structure

St. Joseph's Villa is a long-term care home established in 1879 and has been providing services to the Hamilton-Niagara-Haldimand-Brant region. The Villa owned and operated by St. Joseph's Health System, the organization includes 425 long-term care home beds, 19 temporary alternate health facility beds, community clinics, 107 units of life-equity model seniors living and a 10-bed hospice. The Villa has over 700 employees including part-time staff.

Activities and Supply Chain

SJVD procures goods and services within Canada. SJVD actively participates in several buying groups to streamline procurement processes and leverage collective purchasing power. SJVD is a member of Mohawk-Medbuy, a cooperative member of the Ontario Education Collaborative Marketplace, and frequently utilizes Ontario Ministry of Education Collaborative Marketplace, and frequently utilizes Ontario Ministry of Government Services vendor-of-record arrangements. These collaborations ensure compliance with applicable trade agreements and enable SJV to access a wide range of goods and services at competitive prices. Contracts established between buying groups and vendors stipulate that the same goods and/or services be made available to other public sector organizations, including SJVD.

Such contractors have ensured that they have modified contract language, procurement templates to reflect "fighting against forced labour and child labour in supply chains act".

Section 2: Policies and Due Diligence Processes

SJVD adheres to many examples of provincial and regional legislation, such as the Ontario Human Rights Code and Employment Standards Act, 2000 (ESA), and the Fixing Long-Term Care Homes Act, 2021. Furthermore, SJVD has established internal policies and procedures to ensure that the Villa is aligned with best practices and regulatory requirements pertaining to human rights, a commitment that is reflection in SJVD's code of conduct policies, including but not limited to Harassment and Discrimination Prevention, WhistleBlower and Workplace Ethics.

Current guiding policies are as follows:

- A. Whistle Blowing POL-29 which has been established to provide an environment in which staff are free to report, in good faith, any concerns or wrongdoing without fear of intimidation or retribution.
- B. Ethics POL-31 which outlines the responsibilities and guidelines that are expected of all people working at SJV, and aligns with the Villa's core values of Dignity, Respect, Service, Justice, Responsibility and Enquiry.
- C. Code of Conduct and Standards of Behaviour POL-34
- D. Workplace Bullying Harassment POL-30

Section 3: Risks and Management of Risks

Actions Taken

SJVD has reviewed its 2023 vendor payments. SJVD primarily sources its clinical supplies from a select group of distributors within Canada, the majority of which come from one primary distributor. SJVD has engaged this distributor to understand what actions the distributor has undertaken to ensure the distributor is compliant with Bill S-211. The distributor supplied SJVD with a copy of its Fiscal 2023 Canadian Modern Slavery Statement which was duly signed by the company's President.

SJVD also obtained confirmation from our primary group purchasing organization (GPO) regarding the actions that the GPO has undertaken to satisfy the requirements under Bill S-211. SJVD is satisfied that both organizations have undertaken the necessary steps to comply with this legislation.

Risk Assessment

A significant portion of SJVD's annual spend is related to the purchase of services, which are almost exclusively provided by domestic suppliers. SJVD is not aware of any cases of forced

labour among these service providers. SJVD has assessed the risk of forced or child labour usage among its service suppliers as low given the nature of the services provided and local nature of service providers.

SJVD has identified purchased made via Amazon as higher risk transactions. The purchasing of goods from non-traditional vendors via Amazon has increased at SJVD since the pandemic. While these goods are typically fulfilled and delivered by Amazon's domestic facilities, the origins of manufacturers are sometimes unclear. The lack of clarity and familiarity with the overseas manufacturers heightens the risk that such products could be manufactured with forced or child labour. Overall SJVD's spend with Amazon vendors is operationally insignificant and SJVD is not aware of any purchases that would run counter to Bill S-211. SJVD will continue to monitor these purchases closely to ensure compliance with legislative requirements.

SJVD has made significant strides in mitigating the risks associated with forced labour and child labour by updating its RFP and contract templates. It remains a priority for SJVD to actively monitor new legislation pertaining to labour practices and collaborate with its buying groups and partners.

Moving forward, SJVD aims to leverage the collective influence of its buying groups and partners to implement cohesive policies and training programs for its employees that address forced labour and child labour concerns within the Villa's supply chain. SJVD endeavours to uphold ethical standards and ensure the welfare of workers throughout its procurement activities.

Section 4: Remediation of Risks

SJVD has reached out directly to our major contract providers, and have received commitment from these providers that they too are committed to upholding the requirements within Bill S-211. SJVD is committed to the development of policies and process to identify and reduce risk of sourcing from any supply chains that may not uphold the same standards and strategies to eradicate forced labour and child labour.

Section 5: Remediation of Loss of Income to the Vulnerable Families

SJVD has not found any area of risk regarding the loss of income to vulnerable families as a result of the measures it implemented to reduce forced labour and child labour in its supply chain.

Section 6: Employee Trainings and Communication

SJVD is committed to ongoing training and regular review of its policies regarding forced labour and child labour in hospital supply chains. SJVD will work closely with other entities and partners to develop training materials regarding the Act.

Training sessions and policy reviews will be conducted with relevant employees involved in procurement of goods/services and contract awarding. These sessions will focus on familiarizing staff with updated requirements and evaluation criteria outlined in RFP and contract templates. Additionally, SJVD will participate in all seminars and awareness campaigns offered by federal and provincial supply chain bodies. The objective of the training will be to ensure all SJVD employees stay informed and vigilant about ethical sourcing practices and the prevention of forced labour and child labour within SJVD supply chains.

Section 7: Assessing Effectiveness

To determine the effectiveness of policies addressing forced labor and child labour within supply chains, SJVD will track performance indicators such as the number of trained employees, engagement with suppliers on awareness, remediation actions taken, completed audits, incident reporting rates, supplier compliance, continuous improvement initiatives, and supplier performance reviews. These indicators will provide insight into the level of awareness, compliance and responsiveness to issues, enabling SJVD to gauge the impact of its policies and drive continual improvement in combating forced labour and child labour.