

2023 MODERN SLAVERY REPORT

Introduction:

The Government of Canada introduced Bill S-211, Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Act”), on May 3, 2023 which came into force on January 1, 2024. The Act serves to implement Canada’s international commitment to contribute to the fight against forced labour and child labour through an annual reporting obligation on certain government institutions and other entities, and aims to increase industry awareness, transparency and drive businesses to improve practices. The annual report addresses the measures taken by these entities to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains.

Entities and government institutions doing business in Canada have a responsibility to identify and prevent forced and child labour from their operations and supply chains. Unity Health Toronto (“Unity Health Toronto” or “our” or “we”) is committed to its accountability and transparency under the Act.

This Report is produced by Unity Health Toronto for the financial year ending March 31st 2024 (the “Reporting Period”) on the steps we have taken during the previous fiscal year to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, or of goods imported into Canada, by Unity Health Toronto.

Our Structure, Operations and Supply Chain:

Unity Health Toronto is one of Canada’s largest Catholic healthcare networks serving Toronto, Ontario and works to advance the health of our patients, clients, residents, and our urban communities, across the full spectrum of care, spanning primary care, secondary community care, tertiary and quaternary care services to post-acute through rehabilitation, palliative care and long-term care, while investing in world-class research and education. Our shared purpose is rooted in our common mission of providing excellent, compassionate care to all we serve. Given that Unity Health Toronto’s organizations were founded by the Sisters of St. Joseph, all sites of our sites share a commitment to the Sisters’ legacy of caring for the most marginalized or disadvantaged in our communities, who are often among the most complex in terms of healthcare needs.

Unity Health Toronto, a not-for-profit corporation comprised of the following amalgamated organizations:

- St. Joseph’s Health Centre is a community teaching health centre affiliated with the University of Toronto that has served the communities of west Toronto and beyond for nearly a century.
- St. Michael’s Hospital is Catholic teaching and research hospital affiliated with the University of Toronto, and is a hub for care, ranging from primary and secondary care to highly complex tertiary and quaternary care for patients from across the province.
- Providence Healthcare provides rehabilitation, palliative care, long-term care and community programs in Toronto.

Unity Health Toronto is a designated broader public sector organization subject to the *Broader Public Sector Accountability Act* and the Directives designed to improve accountability and transparency, including in the procurement of goods and services.

Unity Health Toronto contracts with a national Group Purchasing Organization ('GPO') used by hospitals and community-based health care facilities for the procurement of medical supplies, pharmaceutical products, medical devices, and other goods. We may also purchase or source medical products directly from national or international manufacturers/vendors and distributors with the use of clearing houses to facilitate the cross-border transactions. We also operate cafeterias, home care stores, gift shops, and outpatient retail pharmacies at our hospitals that sell over the counter goods directly to patients and visitors, where we may be purchasing directly from suppliers or distributors. Parts of Unity Health Toronto's operation includes the distribution of free medical products and goods, such as harm reduction materials, to vulnerable populations, as well as the distribution of drugs and devices for the purpose of conducting or participating in clinical trials.

Assessing and Managing Risks of Forced and Child Labour in Our Operations and Supply Chain:

Unity Health Toronto is committed to identify and reduce the risk of forced and child labour in its operations and supply chain. To this end, Unity Health Toronto is in the process of identifying the risks of forced and child labour to its supply chains. To better understand Unity Health Toronto's risk of forced and child labour, we intend to map out and assess the potential risks in our supply chains in order to put us in the best position to develop appropriate policies and practices to manage that risk. It is important to appreciate that from an operational standpoint approximately 68% of Unity Health's annual budget is spent on domestic labour costs.

Our Framework, Policies and Due Diligence:

Unity Health Toronto is committed to providing a work and learning environment where our core values of Human Dignity, Compassion, Excellence, Community and Inclusivity are embedded in our culture and consistently guide our actions and interactions. Forced labour and child labour is contrary to our Vision, Mission and Values¹. Unity Health Toronto does not endorse forced or child labour within our organization or those of our suppliers and/or subcontractors with whom we conduct business.

As part of our Procurement Policy, a Supply Chain Code of Ethics is incorporated into the Code of Conduct to address supply-chain-specific standards of practice. To ensure an ethical, professional and accountable Broader Public Sector supply chain, individuals involved with supply chain activities must act, and be seen to act, with integrity and professionalism. Honesty, care and due diligence is integral to supply chain activities within and between Broader Public Sector organizations, including Unity Health Toronto, suppliers and other stakeholders.

Our Code of Conduct outlines the standards of professional conduct and performance expected by all those who are employed or otherwise engaged formally with Unity Health Toronto. All persons covered by the Code of Conduct are expected to comply with it at all times in the workplace, and are required to report any activity or behaviour that contradicts the Code of Conduct.

Unity Health Toronto will seek to continue to examine pertinent policies for compliance as it relates to the Act and appropriately update them upon their review term.

Unity Health Toronto requires all staff to sign a declaration confirming that they understand and will adhere to the Code of Conduct as a condition of employment/engagement.

The following steps have been taken by Unity Health Toronto during the previous fiscal year for compliance with the Act:

- Modified the competitive procurement templates (e.g., Request For Proposal) to include the following language

- *Proponent/Bidder must have policies, processes, and practices in place that are designed to reduce and prevent the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the Bidder or of goods imported into Canada by the Proponent/Bidder and warrants that the goods and services being provided to Unity Health Toronto 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);*
- Modified standard to contract language in the "Representations, Warranties and Covenants" section of our Supplier Agreements:
 - *The Product(s) and any Services provided by the Vendor 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);*

Training:

Unity Health Toronto does not currently provide training with respect to forced labour and child labour as defined in the Act. All Unity Health Toronto staff must complete annual mandatory corporate training, which includes reviewing and affirming adherence to the Code of Conduct.

Remediation Measures:

Unity Health is in the process of identifying supply chain risk as it relates to forced and/or child labour being used in our supply chain, and therefore has not yet determined which remediation measures may be necessary or appropriate.

Unity Health Toronto is not aware of instances of forced and child labour in its operations or supply chains. Nevertheless, Unity Health Toronto recognizes the important role that we have in ensuring that our operations and products, and the supply chains that support these, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain and will continue to consider what additional measures it may undertake to monitor potential risks through our supply chain. Any person who becomes aware of a breach of an individual's professional, ethical, or legal obligations, or a contravention of any policy governing the conduct of persons associated with Unity Health Toronto, or not operating in accordance with its Vision, Mission and Values is responsible for reporting this information immediately in accordance with the hospital policies.

We have established a whistleblowing process that encompasses the reporting of various forms of wrongdoing. This reporting mechanism is accessible to all staff, physicians, directors, students and volunteers and allows for confidential and anonymous submissions. Reports can be submitted over the phone by speaking to a live operator or by leaving a voicemail message, by mailing a hard copy report, or through a web-based solution run by an independent service provider. The provider collects the report and provides it to individuals within Unity Health Toronto who are best positioned and qualified to address, manage and resolve it. Unity Health Toronto intends to track any complaints of the use of forced or child labour.

In accordance with our policies, if a situation of non-compliance is identified, Unity Health Toronto will work to develop and implement a corrective plan to improve and remedy the situation.

Assessing our effectiveness:

Unity Health Toronto is not in a position to accurately determine the effectiveness of our current measures to assess and manage its risk of forced labour or child labour in our supply chains. While we have not yet taken any action to assess the effectiveness of these actions, Unity Health Toronto intends to review its effectiveness in preventing and reducing the risk of forced labour and child labour in its activities at a later stage. We are committed to continuously improving our approach to forced and child labour.

Attestation:

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.

Full name Nora Aufreiter
Title Unity Health Toronto Board of Directors Chair
Date May 16, 2024
Signature,

I have the authority to bind Unity Health Toronto



ⁱ <https://unityhealth.to/about-unity-health/vision-mission-and-value/>