

Modern Slavery Act – Annual Report

Prepared in accordance with section 11(4)(a) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, 2022 (Bill S-211)

TO: The Board of Directors of Women's College Hospital, (the "Board")

FROM: Heather McPherson
President and Corporate Executive Officer
Women's College Hospital

DATE: May 31, 2024

RE: April 1, 2023 to March 31, 2024 ("the Applicable Period")

1. Introduction

This Report is provided by Women's College Hospital ("WCH" or "Corporation" or "our" or "we") in line with the requirements of the Act, this report describes the activities of WCH to limit the risk of using forced and child labour in our supply chains. This report covers activities from April 1, 2023 to March 31, 2024 (the "Reporting Period").

2. Steps to prevent and reduce risks of forced labour and child labour

Numerous statutory requirements are imposed upon Women's College Hospital, as an Ontario hospital. It is incumbent upon those responsible for the operations of the Hospital to undertake steps to ensure compliance with these obligations and to ensure the Board is aware of compliance.

In addition, through its Governance Standards, Accreditation Canada requires that the Board understands and complies with applicable laws, legislation and regulations. These Governance Standards are reviewed by the Board regularly.

In addition, Accountability Agreements with Ontario Health require the Hospital to make annual declarations of compliance with the Broader Public Sector Accountability Act (BPSAA), which includes an annual attestation declaring compliance with a number of directives, of which one includes a stringent procurement directive.

Women's College Hospital maintains corporate policies that promote ethical conduct and business practices, these include:

- Hospital's Business Ethics Policy
- Purchasing Policy
- Code of Conduct Policy, Reporting of Wrongdoing – Complainant Protection Policy

The hospital also maintains an Environmental, Social, Governance (ESG) Committee, that aims to reduce our environmental footprint and maintain compliance with municipal, provincial, and federal legislation, while improving WCH's social presence and overall governance policies, to protect and promote human health and welfare.

Women's College Hospital has updated its competitive procurement templates and standard contract language to require suppliers/vendors bidding or providing to attest that their goods and services are not the result of, and in no way involve, forced labour or child labour.

3. Structure, activities and supply chains

Women's College Hospital is an independent public ambulatory care teaching hospital, with a primary focus on women's health. As an academic health-care centre affiliated with the University of Toronto, the Hospital supports research in women's health and provides training to health-care providers within an ambulatory setting.

Women's College Hospital (the Hospital) is incorporated without share capital under the laws of Ontario and is a registered charity under the Income Tax Act (Canada).

4. Policies, Processes and Due Diligence

Women's College Hospital has a number of policies and practices in place that support human rights and socially responsible business practices, with health and equity embedded in our core values and throughout the Hospital's strategic operating plan.

Business Ethics Policy

Applies to all business activities at the Hospital. This Hospital has adopted the principles of the conduct set out in the Broader Public Sector (BPS) Supply Chain Guidelines "The Supply Chain Code of Ethics", which are: Personal integrity, Professionalism, Accountability, Transparency, Compliance and Continuanance Improvement.

Purchasing Policy

The Hospital's purchasing policy and practices adhere to the Broader Public Sector Procurement Directive, this includes adoption of the Supply Chain Code of Ethics described above that govern conduct of all Women's College Hospital representatives involved with supply chain activities.

Reporting of Wrongdoing – Complainant Protection Policy

Applies to all we deliver, including but not limited to clinical and business processes. This includes commitment to the highest ethical standards. The purpose of this policy is to support ethical conduct by providing an avenue of communication for raising good faith concerns about possible wrongdoing, confidentially and without fear of reprisal.

In addition to the policies listed above, Women's College Hospital maintains an internal Environmental, Sustainability Governance (ESG) Committee, it's objective is to reduce our environmental footprint and maintain compliance with municipal, provincial, and federal legislation,

while improving WCH's social presence and overall governance policies, to protect and promote human health and welfare.

The Hospital outsources majority of its procurement activity to Mohawk Medbuy Corporation ("MMC") and will continue to work with MMC to ensure any necessary steps are taken to help prevent and reduce the risk of forced labour or child labour is used in our supply chains.

MMC has attested that they have taken the following steps:

- Competitive procurement templates have been modified to include language that suppliers/vendors bidding must attest to warrants that the goods and services that the Proponent is proposing to provide are not a result of, and in no way involve, forced labour or child labour.
- Modified standard contract language to include representation and warranties that goods and any services provided by the Supplier under the agreement are not the result of, and in no way involve, forced labour or child labour.
- Formalized its commitment to sustainability and environment, social and governance (ESG) practices through the creation of a dedicated ESG team.

5. Areas of Risk

Women's College Hospital is not aware of any instances where forced labour or child labour exists in current supply chains. We are aware that there may be a risk of forced labour at all levels of supply chain. Our suppliers are predominately Canadian based and required to comply with Canadian laws. We will continue to focus on how we engage with MMC and suppliers which operate in sectors and jurisdictions at higher risk of forced labour or child labour.

MMC has also attested to Women's College Hospital that it is not aware of any instances where forced labour or child labour exists in current supply chains.

6. Measures to remediate any forced or child labour and measures to remediate the loss of income

In the event that the Hospital is informed of, or discovered, the potential or confirmed presence of forced and child labour in its supply chains, the Hospital will investigate and take the appropriate remedial measures by either ceasing, preventing or mitigating any adverse impacts. We did not identify any instances of forced labour or child labour in our supply chains during the reporting period and, therefore, no remedial measures were taken.

7. Training

The Hospital outsources majority of its procurement activity to MMC, Mohawk Medbuy Corporation. Mandatory training is provided to sourcing and supply chain roles within MMC, Mohawk Medbuy. The hospital is currently in the process of evaluating the need to provide similar training to Women's College Hospital staff.

8. How We Assess Effectiveness

Women's College Hospital has demonstrated varied measures in place over the last fiscal year aimed at reducing the risk of forced labour or child labour use in our activities and our supply chains. While we have yet to establish formal policies and procedures for evaluating effectiveness, we are committed to continuing this work through our established ESG Committee, in consultation with MMC and other key stakeholders.

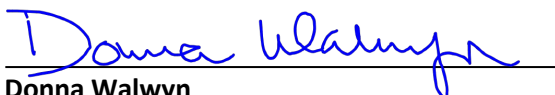
In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purpose of the Act, for the reporting year listed above.

Dated at Toronto, Ontario this May 31, 2024.



Heather McPherson
President and Corporate Executive Officer
Women's College Hospital

I certify that this attestation has been approved by the Board of the Women's College Hospital on May 21, 2024.



Donna Walwyn
Chair of the Board
Women's College Hospital