

Alliance de Chatham-Kent pour la santé

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Wednesday, June 25, 2025

To Whom It May Concern,

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

Organization Report for the Fiscal Year ended March 31, 2025

This report is made under 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. This report outlines the approach and initiatives by Chatham-Kent Health Alliance (“Hospital”) to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing April 1, 2024 and ending March 31, 2025.

Legal Structure

The Hospital is incorporated without share capital under the laws of Ontario. It is an acute care community hospital and is a registered charitable organization.

Supply Chain

The Hospital sources medical devices, medical and surgical supplies, and pharmaceuticals through a network of domestic and global healthcare suppliers. It is a member of a healthcare-specific buying group and also works closely with a strategic sourcing partner. Its supply chain includes vendors with established Canadian operations and those that source inputs and manufacture and distribute goods in countries worldwide.

Risks in Supply Chain

The Hospital is working to identify specific risks of forced labour and child labour that may exist in its supply chain. It recognizes that these risks include but may not be limited to:

- Product substitutions are required due to supply chain disruption.
- Multi-jurisdiction supply chain for inputs required to manufacture medical, surgical and pharmaceutical supplies, and equipment.
- Price sensitivity resulting from the public funding environment and shortfalls, such that reduced forced labour costs cause a product to be priced more attractively.

Actions Taken during the current fiscal year

To date, the Hospital has worked with its strategic sourcing partner and buying group organization to:

- Provide Environmental, Social and Governance (ESG) training (including that specific to Bill S-211) to all relevant employees (including all Sourcing staff). This training highlights obligations, Request for Proposal (RFP), and contract language pertinent to Bill S-211 and guides the employees not to allow removal of that language through any negotiations.
- Issue a “Supplier Risk Assessment” in September 2024 to our top 200 suppliers, and will continue to collect this data, including any EcoVadis or similar 3rd party risk assessment reports.
- The ESG Team has been preparing to launch a “Supplier Code of Conduct” in FY25, which will further reinforce suppliers' standards and expectations (including the elimination of forced labour and child labour).

The hospital has ensured that the following steps were undertaken with its strategic sourcing partner and buying group organization to ensure appropriate measures are in place for vendors to meet the requirements under Bill S-211 in competitive and non-competitive procurements. These measures include:

- Inclusion of standard representations and warranties in contract language; and
- Modifying competitive procurement documents (e.g. RFPs) to require vendor attestation of compliance with Bill S-211.

Additionally, the Hospital maintains employee policies that set forth the duties, responsibilities, and expectations of employment and business conduct. This includes, but is not limited to, details on the policies and procedures that help employees operate safely, ethically, and effectively in all roles and compliance with provincial employment standards, human rights and occupational health and safety legislation.

Actions to be Undertaken

Looking forward, the Hospital is working towards the following:

Development of:

- internal policy related to procurement and vendor relationships to address the requirements under Bill S-211;
- effectiveness assessment tools to ensure the Hospital is monitoring its compliance with the requirements of Bill S-211.

Employee Training

The Hospital did not provide employees with forced and child labour-focused training in 2024. However, as above, it is working towards developing internal training for employees involved in strategic sourcing.

ATTESTATION

By 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.

CHATHAM-KENT HEALTH ALLIANCE

Deborah Crawford

Full name

Board Chair

Title

June 25, 2025

Date

Signature

I have the authority to bind the organization