

**Bill S-211 Fighting Against Forced Labour
and Child Labour in Supply Chains Act**

Entity Report for Georgian Bay General Hospital

April 1, 2024 to March 31, 2025

Approval and Attestation

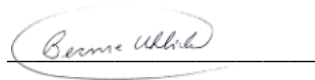
In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act)*, and in particular section 11 thereof, I, in the capacity of Chair of the Board of Directors of Georgian Bay General Hospital, attest that I have reviewed the information contained in the report on behalf of the governing body of Georgian Bay General Hospital. 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 within this report.

Full name: Bernie Uhlich

Title: Chair of the Board of Directors, Georgian Bay General Hospital

Date: May 30, 2025

Signature:

A handwritten signature in cursive script, reading "Bernie Uhlich", is written above a horizontal line.

I have the authority to bind Georgian Bay General Hospital.

Identifying Information

Entity or Government institution: Entity

Reporting entity's legal name: Georgian Bay General Hospital

Financial reporting year: April 1, 2024 to March 31, 2025

Financial year covered by report: 2025

(Note the submission date of the report determines which financial year you are reporting on)

Identification of a revised report: No

Business number(s): 107498693

Identification of a joint report: No

Identification of reporting obligations in other jurisdictions: None

Entity categorizations that apply:

- Canadian Business Presence:
 - Has a place of business in Canada
 - Does business in Canada
 - Has assets in Canada
- Size-Related Thresholds that are met:
 - Has at least \$20 million in assets for at least one of its two most recent financial years
 - Has generated at least \$40 million in revenue for at least one of its two most recent financial years
 - Employs an average of at least 250 employees for at least one of its two most recent financial years

Relevant Sectors/industries that apply:

- Health care and social assistance
 - Hospitals

Principal Location: Midland, Ontario, Canada

Annual Report

Introduction

GBGH (the Hospital) is a medium-sized hospital that serves the communities of Midland, Township of Tiny, Township of Tay, Christian Island, Georgian Bay Township and Springwater Township. Our services range from a 40,000 annual visit emergency department to a comprehensive inpatient program that includes, medical, surgical, complex continuing care, rehab, obstetrics and level 3 (basic) intensive care beds, as well as a range of diagnostic, outpatient and clinical support services.

Structure, Activities and Supply Chains

The Hospital is a not-for-profit organization, and a registered charity incorporated without share capital under the laws of Ontario. The Hospital's primary business is to provide direct care to its patients.

A small portion of our business includes the production of goods, specifically we cook meals for the purpose of selling to customers of our cafeteria. The sales in this revenue stream for fiscal 24/25 are estimated at \$133,000 (an estimated 0.2% of the Hospital's total revenue).

The Hospital relies on a distribution centre to provide just in time stock to our hospital twice a week.

The Hospital uses a shared service organization (the "SSO") to facilitate sourcing and execution of procurement initiatives with our vendors.

There are times when the Hospital does not use the SSO to execute procurement initiatives. This would typically occur when the value of the procurement is less than \$25,000 and does not require a contract. There are also times when credit cards are used to facilitate smaller dollar purchases.

On average, the Hospital imports an estimated \$72,000 CAD (an estimated 0.4% of total procured spend) a year through its customs broker. This would include any supplies necessary to provide patient care. Examples include lab supplies, IT equipment, medical & surgical supplies, and clinical equipment. With the new Procurement Restriction Policy that GBGH must follow, the number of imports is expected to decrease in the next fiscal year ending March 31, 2025.

Policies and Due Diligence

The Hospital conducts procurement activities in accordance with its Procurement Policy ("the Policy"), as well as relevant directives and trade agreements including, but not limited to the following:

- Broader Public Sector Procurement Directive
- Building Ontario Businesses Initiative Act
- Ontario's Procurement Restriction Policy
- Canadian Free Trade Agreement
- Canada-European Union Comprehensive Economic and Trade Agreement

If it is discovered that the Policy has not been followed, and the goods have already been received, services rendered, or a contract executed, the finance or procurement team will use the opportunity to educate regarding policy requirements to reduce the risk of recurrence.

The Policy does not specifically address forced labour or child labour, however a draft policy is currently being reviewed with approval anticipated for the spring of 2025. The Hospital is committed to continuing to partner with our SSO to build a strong foundation supporting the identification and mitigation of risks. Once that strong foundation is built, the next phase of work will include the assessment of the effectiveness in ensuring forced labour are not being used in its activities and supply chain.

The Hospital's SSO has focus on Environmental, Social and Governance (ESG) activities, including anything specific to s-211, through the formalization of an ESG working group which collaborates with its hospital members and will continue to create fulsome workplans to address/mitigate the risk of child and/or forced labour.

The SSO has provided the Hospital with letters identifying due diligence efforts:

- The SSO's ESG Team has been preparing to launch a "Supplier Code of Conduct" in FY25 which will further reinforce the SSO's standards and expectations of suppliers (including the elimination of forced labour and child labour).
- Standard contract language in Representation and Warranties was added:
 - 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 Chain's Act)."
- The Proponent Confirmation Form includes 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)"
- Confirmed they are not aware of any instances where forced labour or child labour exists in current supply chains and would inform the Chief Financial Officer if an instance arises.

The Hospital confirms that it is not aware of any instances where forced labour or child labour exists in current supply chains.

Potential Areas of Risk

The Hospital and the SSO are not aware of any instances where forced labour or child labour exists in our supply chain activities.

As outlined above, there is only a small portion of the Hospital's annual spend that is imported from the United States and as such, the risk is deemed to be low. Although some actions have been taken to reduce the risk, there is more work that can be done.

Other potential areas of risk include:

- Complete awareness of risk with current suppliers.
- The conduct of suppliers further down the supply chain than the direct supplier.
- The Policy does not specifically address forced labour or child labour, however a draft policy is currently being reviewed with approval anticipated for the spring of 2025.

The Hospital will continue work to identify and mitigate potential areas of work by:

- Collaborating with the SSO on their work to request/review risk assessments from top suppliers.
- Continued discussion with the SSO at business review meetings, and participating and providing feedback on workplans and progress.
- Review reports published by other hospitals to benchmark and seek out best practices.
- Ensuring the Policy is updated to specifically address forced labour or child labour.

Steps Taken to Assess and Reduce Risk

This fiscal year, steps were taken by our SSO and the Hospital to better educate ourselves on the Act itself.

Import records through our customs broker were also reviewed to better understand the spend on imports annually and what the magnitude of risk is from a dollars perspective.

The Hospital has drafted a revision of the Policy to specifically address forced labour and child labour, with approval anticipated for the spring of 2025.

The SSO has provided the Hospital with a letter identifying that they:

- Formalized an emphasis on sustainability and ESG elements, through the creation of a focused ESG team. This team is responsible for program development, to ensure the SSO's ongoing sustainability, as well as supporting their members as an enabler of a cohesive sustainable health care supply chain built on a high degree of standards.
- Provided 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 through any negotiations.
- Issued a "Supplier Risk Assessment" to their top 200 suppliers, continue to collect the data, including any EcoVadis or similar 3rd party risk assessment reports.
- The ESG team is preparing to launch a "Supplier Code of Conduct" which will further reinforce the SSO's standards and expectations of suppliers (including the elimination of forced labour and child labour).

Remediation Measures Taken

Forced labour or child labour in our activities and supply chains has not been identified, and as such, remediation measures were not applicable. If a supplier were to be suspected to be in breach, GBGH will develop and implement a corrective plan to effectively address the issue and immediately remedy the situation. The SSO has advised that their process is to inform the Chief Financial Officer if an instance arises.

The SSO has provided the Hospital with a letter identifying that:

- They are not aware of any instances where forced labour or child labour exists in current supply changes and would inform the Chief Financial Officer if an instance arises.

Training

Procurement policy training for the Hospital's leaders occurred in April of 2025.

If it is discovered that the Policy has not been followed, and the goods have already been received, services rendered, or a contract executed, the finance or procurement team will use the opportunity to educate regarding policy requirements to reduce the risk of recurrence.

The Hospital's SSO provided ESG training (including that specific to Bill S-211) to all relevant employees (including all Sourcing staff). This training highlights obligations, RFP, and contract language through any negotiations.

How GBGH Assesses Effectiveness in Ensuring Forced or Child Labour are Not Used in its Activities and Supply Chains

The Hospital and its SSO is focused and committed to ensuring our health care supply chain is built on a high degree of standards. The SSO's ESG team has several initiatives underway to identify risks with current vendors and to reduce/mitigate risk moving forward. The Hospital will continue to partner with our SSO to build a strong foundation to continue to identify and mitigate risk. When that strong foundation is built, the next phase of work will include effectiveness assessments.