

# Reporting for the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Financial period,

April 1, 2024, to March 31, 2025

## **Halton Healthcare**

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 Board of Halton Healthcare, (the "Board")

**FROM:** Melissa Farrell  
President & Chief Executive Officer

**Date:** May 27, 2025

**REPORTING PERIOD:** April 1, 2024, to March 31, 2025

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On behalf of Halton Healthcare, 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.

Melissa Farrell  
President and Chief Executive Officer

Signed by: Melissa Farrell 6/19/2025  
Signature 127F2D4DFDEE487... date

I have the authority to bind Halton Healthcare.

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I certify that this attestation has been approved by the Board of Halton Healthcare.

Samantha Horn  
Chair of the Board

DocuSigned by: Samantha Horn 6/19/2025  
Signature 8BA83BD3D2C44A6... date

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## Executive Summary

Bill S-211, known as the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”), came into force on January 1, 2024. This annual report, prepared in compliance with section 11 of the Act for financial reporting year of April 1, 2024, to March 31, 2025, outlines Halton Healthcare’s key activities related to this legislation.

Recognizing the complexity and evolving nature of combating forced labour and child labour in supply chains, Halton Healthcare commits to continually exploring opportunities to enhance supply chain transparency and will strive to develop adequate policies and training programs for its employees.

## Section 1: Structure, Activities and Supply Chains

### **Structure**

Halton Healthcare is a healthcare organization comprised of three community hospitals and numerous community-based services in the growing urban and rural communities of Halton Hills, Milton, and Oakville. Halton Healthcare is governed by a voluntary Board of Directors.

### **Activities**

Halton Healthcare provides a wide range of healthcare services, including emergency care, surgeries, maternity services, diagnostic imaging, rehabilitation, mental health services, and specialized treatments and tests.

### **Supply Chain**

The primary procurement activities involve sourcing and purchasing medical supplies, equipment, pharmaceuticals, and other necessary items and services for the hospital. Sourcing and procurement activities are mostly managed by shared service organisations, Mohawk Medbuy Corporation (MMC) and Healthpro Canada.

The majority of Halton Healthcare’s goods and services are procured from the Canadian market, however depending on the type of products and the availability, they could be sourced from abroad. Regardless of the location of the suppliers and whether they are sourced locally or through imports most procurement activities, including the identification and qualification of supplier and products, are managed by shared service groups.

Halton Healthcare does not have any material production of goods. Halton Healthcare manages multiple gift shops at its sites. Items sold in these locations are purchased from local distributors. Most other retail spaces at Halton Healthcare are rented to third party operators that conduct their own procurement activities.

## Section 2: Policies and due diligence processes

Halton Healthcare addresses the issues of forced labour and child labour in its competitive procurement policy which notes the requirement to ensure reporting compliance with respect to Bill S-211. Halton also has general policies such as the code of conduct for staff which sets the expectation for respectful, professional, and ethical behaviour as well as compliance with applicable legislation and regulations.

With respect to purchasing processes and policies, there is a form included with the standard sourcing (RFx) packages where we request the proponents to warrant that the goods and services that the proponent is proposing are not the result of, and in no way involve, forced labour or child labour. In addition, a provision is included in the standard Purchase Agreement Templates, under Supplier's Representations, Warranties, Covenants section, where suppliers must confirm the goods and any services provided by them under the agreement are not the result of, and in no way involve, forced labour or child labour.

### Section 3: Risks and management of risks

Through the work and assessments done to date, Halton Healthcare has not identified and has not been made aware of any instances where forced labour or child labour exists in its supply chains.

The majority of Halton Healthcare's sourcing and procurement activities are managed by shared service organisations. These activities represent the most significant risk considering this is how most of Halton Healthcare's goods and services are procured. We have received confirmation letters from each of those organisations, where they confirmed their due diligence and compliance with the Act. As of today, they have not been made aware of any instances where forced labour or child labour exists in current supply chains, but should such instances come to light, they will inform Halton Healthcare. In addition, they have added new provisions and requirements to the standard sourcing (RFx) documents and contracts, to ensure compliance of suppliers with the Act.

Distribution and logistics of goods at Halton Healthcare is an internal process, and is managed by the hospital's employees, who are protected by various employment and human rights regulations.

### Section 4: Remediation of risks

We have exercised care and due diligence to assess Halton Healthcare's supply chain and to date, we have not identified any areas of risks.

### Section 5: Remediation of loss of income to the vulnerable families

We have exercised care and due diligence to assess Halton Healthcare's supply chain and to date, we have not identified any areas of risks.

## Section 6: Employee trainings and communications

Communication to employees, particularly those involved in procurement, is important to increase awareness and provide information to staff on their role in addressing this issue. To accomplish this our share service organization provided a review of this legislation at a leadership meeting.

## Section 7: Ensuring effectiveness

We understand the process of fighting against forced labour and child labour in supply chains is complex and evolving. Hence, the adoption of the Act requires ongoing and iterative processes in our organisation.

Halton Healthcare does not currently have any direct assessment processes that determine the effectiveness in ensuring that forced labour and child labour are not being used in our activities and supply chains. Given that our procurement processes and supply chain activities are coordinated by group purchasing organizations we are working closely with these organizations to ensure that the procurement processes and supply chain activities have robust controls in place to ensure forced labour and child labour are not being used by our suppliers and in our supply chains. We will continue to work closely with other entities, such as OHA and MMC, to develop respective policies and trainings for our employees.

In addition, our supporting shared services organisations (MMC and HealthPro) are committed to incorporate iterative improvements to the activities undertaken relative to this legislation and healthcare supply chains, including the development of internal policy in their organisations and training for those in sourcing and supply chain roles.

## References

1. MMC Attestation Letter
2. Healthpro Attestation Letter