



Annual Report for the Bill S-211: *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Financial period:
FY 2024-25 (April 1, 2024 to March 31, 2025)

Hamilton Health Sciences Corporation

May 22, 2025



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 Hamilton Health Sciences, (the “Board”)
FROM: Tracey MacArthur
President & Chief Executive Officer
Hamilton Health Sciences
Date: May 22, 2025
REPORTING PERIOD: April 1, 2024 to March 31, 2025

On behalf of Hamilton Health Sciences, 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.

Tracey MacArthur
President and Chief Executive Officer
Hamilton Health Sciences
May 22, 2025.

Tracey MacArthur
Tracey MacArthur (May 7, 2025 07:42 EDT)

[Signature]

I have the authority to bind Hamilton Health Sciences

I certify that this attestation has been approved by the Board of Hamilton Health Sciences on May 22, 2025.

Keith Monroe
Keith Monroe (May 6, 2025 16:00 EDT)

[Signature]

Keith Monroe
Board Chair
Hamilton Health Sciences

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Executive Summary

Hamilton Health Sciences is a community of 18,000 staff, physicians, researchers and volunteers that proudly serves southwestern Ontario residents. We also provide specialized, advanced care to people from across the province.

HHS is the only hospital in Ontario that cares for all ages, from pre-birth to end-of-life. We offer world-leading expertise in many areas, including cardiac and stroke care, cancer care, palliative care and pediatrics.

We are a world-renowned hospital for healthcare research. We focus daily on improving the quality of care for our patients through innovation and evidence-based practices.

As the largest employer in the Greater Hamilton region, we play a vital role in training the next generation of health professionals in collaboration with our academic partners, including McMaster University and Mohawk College. As such, Hamilton Health Sciences (“HHS”) is committed to operating with integrity and high ethical standards, including respecting human rights.

In support of the passage of Bill S-211 *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, (the “Act”), HHS stands committed to complying and enforcing the Act at every level of its supply chain.

HHS understands that continuous and iterative processes within the organization are necessary to comply with the Act due to the complexity and dynamic nature of the fight against child labor and forced labor in supply chains. HHS is committed to continuously looking for ways to improve supplier chain transparency and will work to create suitable operational improvements and staff training initiatives.

HHS’s annual report will be available to the public online for viewing and download at:

- The HHS website: <https://www.hamiltonhealthsciences.ca/about-us/our-performance/financial-accountability/>
- In an electronic registry on Public Safety Canada’s website

Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour

Hamilton Health Sciences (“HHS”) is committed to preventing and reducing the risk of forced labour and child labour and has taken the following measures during the reporting period.

In the past financial year, Hamilton Health Sciences (“HHS”) has proactively addressed the critical issue of forced labor and child labor within its operations and supply chains, both domestically in Canada and internationally. Our organization has conducted an internal assessment of our vendor base to identify potential risks of forced labor and child labor across its activities and supply chains.

One key initiative implemented by HHS was the requirement for all vendors to have robust policies and procedures in place explicitly prohibiting the use of forced labour and child labour within their activities and supply chains. To ensure our vendor community is aligned with and supports HHS’ efforts and commitment to combating forced and child labour, all contracted and/or prospective vendors are required to provide attestation to Bill S-211 compliance. By mandating these policies, HHS not only reinforces its commitment to ethical business practices, but also sets clear expectations for its vendor partners regarding labour standards.

To support this work and enforce compliance with ethical labor practices, HHS has added child labour and forced labour protection into our procurement policies and processes and vendor contract language. These measures aim to further safeguard against the exploitation of children within our operations and supply chains.

HHS recognizes the importance of raising awareness and building capacity within its workforce and supply chain partners. To this end, HHS is seeking professional training and awareness materials specifically focused on forced labor and child labor. These resources will equip procurement staff and stakeholders with the knowledge and tools necessary to identify, prevent, and address instances of labor exploitation effectively.

In addition to internal efforts, HHS continues to actively engage with its supply chain partners and peer hospitals on the issue of forced labor and child labor. Through collaborative initiatives and ongoing dialogue, HHS seeks to foster a collective commitment to address these challenges across the entire supply chain. By working together with vendors and peers, HHS aims to implement sustainable solutions that promote ethical labor practices and protect human rights.

HHS’ multifaceted approach demonstrates its dedication to combating forced labor and child labor within its operations and supply chains. By conducting internal assessments, implementing stringent policies, developing training materials, and engaging with stakeholders, vendors, and peers, HHS is taking proactive steps to mitigate risks and uphold ethical standards. As HHS continues to progress in its efforts, it remains steadfast in its commitment to promoting fair and responsible labour practices globally.

Questionnaire Response

The following information uses the Ministry's online questionnaire as the template for the report.

Bill S-211 reporting Questionnaire is located here:

<https://www.publicsafety.gc.ca/cnt/cntrng-crm/frcd-lbr-cndn-spply-chns/sbmt-rprt-en.aspx#a1>

Part 1 – Submission Information

Question	HHS Response
1. This report is for:	Entity
2. State the legal name of the reporting entity or government institution	Hamilton Health Sciences Corporation
3. Reporting year	FY 2024-25
4. Financial year covered by report	April 1, 2024
5. Is this a revised version of a report that was already submitted this reporting year?	No
5.1 If yes, on what date was the original report submitted	N/A
5.2 Describe the changes made to the original submission, including the sections of the original report that were revised or any changes made to questionnaire responses	N/A
6. For entities only: Business number(s) (if applicable, provide the business number of the entity completing this questionnaire)	867435497
7. For entities only: Is this a joint report?	No
7.1 If yes, state the legal name of each entity covered by this report.	N/A
7.2 Identify the business number(s) of each entity covered by this report (if applicable)	N/A
8. For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?	No

8.1 If yes, select the applicable law(s). Select all that apply.	N/A
9. For entities only: Which of the following categorizations applies to the entity? Select all that apply.	<p>Canadian business presence (select all that apply):</p> <ul style="list-style-type: none"> • Has a place of business in Canada • Does business in Canada • Has assets in Canada <p>Meets size-related thresholds (select all that apply):</p> <ul style="list-style-type: none"> • 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
10. For entities only: Which of the following sectors or industries does the entity operate in? Select all that apply.	<ul style="list-style-type: none"> • Health care and social assistance <ul style="list-style-type: none"> ○ Hospitals
11. For entities only: In which country is the entity headquartered or principally located?	Canada
11.1 If in Canada: In which province or territory is the entity headquartered or principally located?	Ontario
12. For government institutions only: Is this a report for a parent federal Crown corporation or a wholly-owned subsidiary?	N/A
12.1 If yes, in which of the following sectors or industries does the parent federal Crown corporation or wholly-owned subsidiary operate? Select all that apply.	N/A
12.2 If yes, in which province or territory is the parent federal Crown corporation or wholly-owned subsidiary headquartered or principally located?	N/A

**PART 2 – Annual Report
Reporting for Entities**

Question	HHS Response
1. Which of the following accurately describes the entity's structure?	Corporation
2. Which of the following accurately describes the entity's activities? Select all that apply.	Importing into Canada goods produced outside Canada
3. What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply.	<ul style="list-style-type: none"> • Mapping activities • Mapping supply chains • Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains • Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily • Addressing practices in the organization's activities and supply chains that may cause or contribute to the risk of forced labour and/or child labour • Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains • Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour • Requiring suppliers to have policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains • Developing and implementing anti-forced labour and/or -child labour contractual clauses • Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists • Monitoring suppliers

	<ul style="list-style-type: none"> Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
<p>4. Please provide additional information describing the steps taken (if applicable) (3,000 character limit).</p>	<p>In May 2023, HHS sent a communication to our vendor community advising them our intent to take action to ensure there is alignment between HHS and our contracted vendors related to important social and economic issues, including Bill S-211, referred to as Values-Based Procurement standards.</p> <p>To accomplish these goals, HHS has developed standard work related to vendor contract onboarding. All vendors are required to submit their attestation confirming they have policies, procedures, and governance structure to support each element of our Values-Bases Procurement model.</p> <p>Vendors were required to attest to the following: In compliance with Bill S-211, the proponent attests that their organization has policies, processes, and governance structure 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 entity or of goods imported into Canada by the entity.</p> <p>Further, the Goods and any services provided by the Vendor under existing Agreements 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).</p> <p>Responses are logged, tracked, and managed in the HHS contract management system.</p>

	HHS is also working closely with our Group Purchasing Organization (GPO) Mohawk Medbuy Corporation on strategies to address, combat, and report on forced and child labour within our supply chains.
5. Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?	Yes
5.1 If yes, which elements of the policies and/or due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply.	<ul style="list-style-type: none"> • Embedding responsible business conduct into policies and management systems • Identifying and assessing potential and actual adverse impacts in operations, supply chains and business relationships
6. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?	Yes, we have started the process of identifying parts of our activities and/or supply chains that carry risks, but there are still gaps in our assessments.
6.1 If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.	None of the above
7. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries?	None of the above
8. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable)	Not applicable
9. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?	Not applicable
9.1 If yes, which remediation measures has the entity taken?	Not applicable

Select all that apply.	
10. Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains?	Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.
11. Does the entity currently provide training to employees on forced labour and/or child labour?	Yes
11.1 If yes, is the training mandatory?	Yes, the training is mandatory for employees making contracting or purchasing decisions.
12. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?	Yes
12.1 If yes, what method does the entity use to assess its effectiveness? Select all that apply.	Setting up a regular review or audit of the entity's policies and procedures related to forced labour and child labour.