



**Modern Slavery Act Annual Report & Attestation**

*April 1, 2024 to March 31, 2025*

*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)*


## Approval and Attestation

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 purposes of the Act, for the reporting year listed above.

Full name: Melodie Mason

Title: Headwaters Health Care Centre - Board Chair

Date: May 30, 2025

Signature: 

I have the authority to bind Headwaters Health Care Centre.

## Reporting Details

**Reporting entity's legal name:** Headwaters Health Care Centre

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

**Identification of a revised report:** N/A

**Business number(s):** 1009064

**Identification of a joint report:** N/A

**Identification of reporting obligations in other jurisdictions:** N/A

**Entity categorization according to the Act:** Entity

**Sector/industry:** Public Sector / Health Care

**Location:** Orangeville, Ontario, Canada

## Introduction:

### About Headwaters Health Care Centre

Headwaters Health Care Centre is an innovative hospital located in Orangeville; Ontario dedicated to quality patient-centred care together with our community in Dufferin County-Caledon. In addition to providing acute and complex continuing care with a 24/7 Emergency Department, and extensive Ambulatory Care outpatient services, Headwaters is accredited with Exemplary Standing by Accreditation Canada, certified as a Breast Assessment Centre by the Ontario Breast Screening Program, and will be offering MRI services in 2025. Headwaters is a cornerstone of health and wellness for the communities it serves. It is one of the area's largest employers with over 800 staff, 200 physicians and six midwives and benefits from the dedication of over 200 volunteers. Learn more at [headwatershealth.ca](http://headwatershealth.ca) and support the hospital at [hhccfoundation.com](http://hhccfoundation.com)

Headwaters is also a proud partner in the Hills of Headwaters Collaborative Ontario Health Team.

### Hospital Structure:

Headwaters Health Care Centre (HHCC) is incorporated in the town of Orangeville, Ontario, Canada as a not-for-profit public hospital, designated under the Public Hospitals Act, R.S.O. 1990, Chapter P.40.

### Board of Directors

As per the Public Hospitals Act, R.S.O. 1990, Chapter P.40, the Board has the unrestricted power to carry out directions in the PHA but such powers shall not contravene the provisions of any other Act.

Headwaters has a Corporate By-law relating generally to the conduct of the activities and affairs of the Corporation. The Board is the board of directors of the Corporation. In accordance with the

Corporation's articles, by-laws, and the PHA, the Board consists of 14-21 directors (8-15 elected directors and 6 ex-officio non-voting directors). Subject to the by-laws, an elected director is elected to the Board for a term of 3 years and may serve for a maximum of two terms (6 years).

#### President and Chief Executive Officer (CEO)

The President and CEO is appointed by the Board of Directors. The President and CEO has supervision over, and direction over hospital operations, staff, volunteers and strategic direction, and such other powers and duties as from time to time be assigned by the Board of Directors. The CEO, subject to the authority of the Board, is responsible for the administration, organization and management of the affairs of the Corporation.

#### **Activities, Supply Chain and Potential Areas of Risk**

The hospital's primary business is as an acute care hospital with administrative and ancillary units which support operations. Specific business units or ancillaries identified in this section of the report sell or resell goods to the hospital community and/or public.

#### **Goods for Resale**

The hospital operates a cafeteria for staff, volunteers, physicians, patients and visitors and purchases most of their food from Sysco Canada under a HealthPRO Contract. HealthPRO Canada is a group purchase organization (GPO) that supports HHCC with contracts for our Food Service and Pharmacy departments.

HealthPRO has reviewed our contracting processes and documents and confirm:

- HealthPRO Canada Nutrition and Food, Capital Equipment, Support Services, Clinical Services, and Signature Services contracts commencing April 1, 2024, or afterward, and HealthPRO Canada Pharmacy contracts commencing June 1, 2024 or afterward, included scored questions in the Request for Proposal (RFP) documents as to the Suppliers' commitment to all steps to fight against forced labour and child labour in Supply Chains. The questions score suppliers based on how well their public-facing commitment addresses the 11 indicators of forced labour as per the International Labour Organization (ILO). In addition, suppliers are asked to provide information on relevant policies, programs, third party audits, monitoring effort & measurable indicators, and disclosure of any legal actions, sanctions or fines that the supplier has had imposed.
- HealthPRO Canada's Nutrition and Food Services partner Complete Purchasing Services "CPS" also, strictly requires that its suppliers comply with all applicable laws, and, in addition, have multiple policies and processes to set expectations for suppliers regarding human rights and labour rights (including child labour and forced labour).

## **Hospital Supply Chain**

The hospital conducts procurement activities in accordance with its Procurement and Tendering Policy, Supply Chain Code of Ethics as well as relevant directives and trade agreements including but not limited to the following:

- Broader Public Sector Procurement Directive
- Canadian Free Trade Agreement
- Canada-European Union Comprehensive Economic and Trade Agreement

For the reporting period, the majority of hospital procurement was administered by various Shared Service Organizations (SSOs) organizations; Mohawk Medbuy effective April 1, 2024; Mohawk Medbuy (MMC); Ontario Education Collaborative Market (OECM); HealthPro, and Kinetics.

All SSOs have put measures in place to support the requirement of the Act.

## **Policies and Due Diligence, Remediation, Assessment of Effectiveness, and Training**

### **Policies**

Our HHCC Procurement Policy speaks to the Supply Chain Code of Ethics however, key elements to the forced and child labour Act need to be added. Further work will be needed to ensure the policy is consistently embedded into all applicable contracts on a go-forward basis.

Working with many other hospitals within our SSO's, this work is already in progress.

### **Potential Areas of Risk**

Where SSW has administered and facilitated our procurement and supported our supply chain activities, it is understood that they will complete the due diligence for their supply chain activities and assume the risk as it pertains to forced labour or child labour. We will ensure all SSO's who procure on our behalf, will approach this in a similar manner.

Canadian businesses, or businesses with a Canadian fulfillment address form the majority of suppliers known to the hospital this fiscal year. As certificates of origin can currently only be confirmed for procurements where the hospital is the importer of record there may be potential risk for forced and/or child labour in the supply chain via direct imports.

### **Remediation Steps and Measures**

The following steps have been undertaken by Mohawk Medbuy during the current fiscal year:

- Mohawk Medbuy has provided 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 relevant to Bill S-211 and guides the employees to not allow removal of that language through any negotiations.

- Mohawk Medbuy issued a “Supplier Risk Assessment” in September 2024 to our top 200 suppliers, and Mohawk Medbuy continued to collect this data, including any EcoVadis or similar 3rd party risk assessment reports.
- Mohawk Medbuy’s ESG Team has been making preparations to launch a “Supplier Code of Conduct” in FY25 which will further reinforce Mohawk Medbuy’s standards and expectations of suppliers (including the elimination of forced labour and child labour)

Beginning January 1, 2024, Mohawk Medbuy modified standard contract language to include the following in Representation and Warranties:

*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).*

Mohawk Medbuy has modified competitive procurement templates (e.g. RFP), specifically the Proponent Confirmation Form, to include 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);*

### **Remediation to loss of income to vulnerable families**

Currently there is no process or measure to remediate the loss of income to the most vulnerable families that result from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.

### **Training provided to employees**

Our shared service provider MMC have developed policies and training for their staff in the sourcing and procurement domains.