



# HÔTEL - DIEU GRACE HEALTHCARE

ESTD 1888

## **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 pursuant to 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 Hotel Dieu Grace Healthcare (“Hospital”) to identify and address the risks 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 a post-acute care community hospital and is a registered charitable organization.

### **Supply Chain**

The Hospital sources medical devices, medical and surgical supplies, and pharmaceuticals and supplies through a network of domestic and global healthcare suppliers. It is a member of healthcare specific buying groups and 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 around the world.

### **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 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 public funding environment and shortfalls such that reduced forced labour costs cause a product to be priced more attractively

**CHANGING LIVES TOGETHER**

## Actions Taken

To date, the Hospital has worked with its strategic sourcing partners and buying group organizations 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:

- 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 has 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), 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).

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 in compliance with provincial employment standards, human rights and occupational health and safety legislation.

- Hospital staff responsible for procurement have also been trained on the requirements under Bill S-211

## Actions to be Undertaken

Looking forward, the Hospital is working towards the following:  
Development of:

- 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).

## Remediation Measures

The Hospital has not identified any forced labour or child labour in its activities or supply chains and so remediation has not been assessed.

## Effectiveness Assessment

The Hospital's strategic sourcing partner has significant expertise in supply chains. The Hospital has leveraged this expertise to help it assess the effectiveness of existing measures to address forced and child labour, and to identify particular areas of risk. *(Please see attached letter from Mohawk Medbuy)*

## 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 Hôtel-Dieu Grace Healthcare. 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.



Pat Soulliere  
Board Chair  
May 30, 2025



Biagio (Bill) Marra  
President & CEO  
May 30, 2025



Sherri Laframboise  
Chief Financial Officer  
May 30, 2025

I/We have the authority to bind Hôtel-Dieu Grace Healthcare

March 7, 2025

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

Dear Member,

We provide this letter in connection with Bill S-211, the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Act”, “Bill S-211”, “the Bill”).

In providing this letter, we have exercised care and diligence that would reasonably be expected of a Chief Operating Officer, and Chief Marketing Officer and Senior Vice President, Strategy, in these circumstances.

The following steps have been undertaken by Mohawk Medbuy during the **current fiscal year** and may be included for completeness in legislative reporting completed by the Hospital for compliance with Bill S-211.

- 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).

The following steps were undertaken by Mohawk Medbuy during the **previous fiscal year**.

- Mohawk Medbuy has 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), 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).



Other relevant information includes the following:

- Mohawk Medbuy has 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, Mohawk Medbuy will inform your Chief Financial Officer.
- Mohawk Medbuy 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 our organization's ongoing sustainability, as well as supporting our Members as an enabler of a cohesive sustainable health care supply chain built on a high degree of standards.

Sincerely,

**MOHAWK MEDBUY**

A handwritten signature in black ink that reads "Janice Mundell".

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Janice Mundell  
Chief Marketing Officer and  
Senior Vice President,  
Strategy

A handwritten signature in black ink that reads "Peter Longo".

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Peter Longo  
Chief Operating Officer