

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

Financial period

April 1, 2024 to March 31, 2025

**Joseph Brant Hospital**

**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:** Board of Directors for Joseph Brant Hospital, (the “Board”)  
**FROM:** Eric Vandewall  
President & Chief Executive Officer  
Joseph Brant Hospital  
**Date:** May 31, 2025  
**REPORTING PERIOD:** April 1, 2024, to March 31, 2025

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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 President and Chief Executive Officer, attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.

**Full Name:** Eric Vandewall  
**Title:** President and Chief Executive Officer  
**Date:** May 30, 2025

Signature: 

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I have the authority to bind Joseph Brant Hospital

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## Executive Summary

Joseph Brant Hospital (“JBH”) is a full-service community teaching hospital located in the growing and thriving community of Burlington, Ontario, serving more than 185,000 residents in Halton, Hamilton, Waterdown, Flamborough, Milton and Stoney Creek. JBH is honoured to be recognized as one of Hamilton Niagara’s Top Employers for eight consecutive years, with a skilled staff of 194 physicians, 1,911 full and part-time staff and more than 300 volunteers.

JBH is a Clinical Education site in conjunction with McMaster University, and designated as an Academic Community Teaching Hospital. Its expanded campus includes the state-of-the-art Michael Lee-Chin & Family Patient Tower, featuring a new Emergency Department, 295 acute inpatient beds, 9 new Operating Rooms, and post-anaesthetic care unit to support expanded medical, surgical, and outpatient services. JBH is also a partner member of the Burlington Ontario Health Team (“BOHT”).

JBH inspires and empowers a culture of caring and this is demonstrated in many ways including our commitment to the health, safety, and wellbeing of our people.

JBH acknowledges and is committed to comply with Bill S-211: Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). JBH embraces the Act as a necessary step forward to combat forced and child labour and to facilitate and track annual progress. This annual report is JBH’s second report under this legislation and is prepared in compliance with section 11 of the Act for the financial reporting year of April 1, 2024 to March 31, 2025. It outlines JBH’s work completed in relation to this legislation.

JBH recognizes the continuous work required to help prevent and stop forced and child labour in supply chains. Through annual reporting, JBH commits to ongoing updates to develop adequate policies and provide training programs for staff who will work to ensure JBH’s supply chain is free of forced labour and child labour.

Recognizing the complexity and evolving nature of combating forced labour and child labour in supply chains, JBH acknowledges that compliance with the Act necessitates ongoing and iterative processes within the organization. Therefore, JBH commits to regularly update and maintain its policies and procedures and to provide programs for its employees in order to ensure JBH’s supply chain is free of forced labour and child labour.

JBH’s annual report will be available to the public online for viewing and download at: [www.josephbranthospital.ca](http://www.josephbranthospital.ca).

### **Subsection 11(1) response**

Over the course of the previous fiscal year, JBH continues to leverage contracts through its Shared Services Organization (“SSO”) Mohawk Medbuy Corporation (“MMC”) for the majority of required supplies, consumables, services and equipment. MMC has updated its Request for Proposal (“RFP”) and contract templates to incorporate appropriate language focused on preventing the risk of forced labour and child labour being used by suppliers or in their supply chains. JBH has updated its own RFP and contract templates with similar language for suppliers that work with JBH directly.

JBH is not aware of any instances of forced labour and child labour being used in MMC contracts or those that fall outside of MMC. Moreover, MMC and JBH have not been made aware of any instances where forced labour or child labour exist in current supply chains. Should any issues be identified, JBH is committed to investigate accordingly. JBH will continue to work with MMC as they formalize their commitment to sustainability and Environmental, Social and Governance (“ESG”) practices through the creation of a dedicated ESG team to enable a cohesive, sustainable health care supply chain.

### **Subsection 11(3) response**

#### **a) Structure, activities and supply chains**

JBH is a leading hospital corporation located in Burlington, Ontario, and is governed by Board of Directors. With a skilled team of 194 physicians, 1,911 full and part-time staff and more than 300 volunteers, JBH services the growing and diverse populations in Burlington, Halton, Hamilton, Waterdown, Flamborough, Milton and Stoney Creek.

JBH is a Clinical Education site in conjunction with McMaster University, and designated as an Academic Community Teaching Hospital. Its expanded campus includes the state-of-the-art Michael Lee-Chin & Family Patient Tower, featuring a new Emergency Department, 295 acute inpatient beds, 9 new Operating Rooms, and post-anaesthetic care unit to support expanded medical, surgical, and outpatient services.

In line with JBH’s Mission (Provide high-quality person-centred care together with our partners), Vision (Relentless pursuit of exemplary care and experiences for all) and Values (Compassion, Accountability, Respect, Excellence), collaboration with suppliers and stakeholders is key to maintaining high standards of quality and patient safety. JBH formed a Diversity, Equity and Inclusion action table in 2020. This action table incorporates JBH’s strategic objectives and uses an anti-oppression approach to supporting a workplace that actively seeks to rectify systemic inequities and upholds our Values, Mission, and Vision.

JBH’s supply chain encompasses a range of activities and processes from the acquisition of medical supplies and equipment to the delivery of patient care. Purchasing entails sourcing and procuring medical supplies, equipment, pharmaceuticals, and other necessary items and services for the hospital.

Key components of JBH's supply chain include procurement and distribution / logistics services. Procurement involves sourcing and purchasing medical supplies, equipment, pharmaceuticals, and other necessary items and services for the hospital. JBH's sourcing and procurement activities, as well as distribution, are primarily managed by MMC. Internal logistics staff ensure timely product delivery to departments and sites across the organization.

**b) Policies and due diligence processes**

MMC, which facilitates the majority of JBH's contracts, and JBH, have modified their contract and competitive procurement templates to include language that supports the reduction of forced and child labour. Neither JBH nor MMC have been made aware of any instances where forced labour or child labour exist within our current supply chain.

JBH is committed to our obligations mandated by the government, such as Ontario Human Rights Code<sup>2</sup> and Employment standards Act<sup>3</sup>, and are guided by our corporate policies including but not limited to Code of Conduct Policy and Procedure 1-10-200<sup>1</sup>, Occupational Health & Safety 1-10-205, Harassment and Discrimination Policy and Procedure 1-10-120, Ethical Practices Policy 050, Environmental Sourcing Policy 026, Non-Discrimination Policy 025, and Identifying and Managing Child Abuse and Neglect Policy and Procedure 1-60-166.

JBH believes in accountability and transparency of information. On a regular basis we post and update all the information relating to areas that include Accountability Agreements, Broader Public Sector Accountability ("BPSA") and Accessibility for Ontarians with Disabilities Act Policies.

JBH has been working on updates to its policies and procedures to ensure that appropriate due diligence measures are in place where suppliers are required to comply with regulations related to prohibiting the use of forced or child labour in their activities and supply chains.

JBH has provided Environmental, Social and Governance (ESG) training (including that specific to Bill S-211), developed by MMC, 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.

MMC issued a "Supplier Risk Assessment" during the previous fiscal year to the top 200 suppliers and continued to collect this data, including any third party risk assessment reports.

MMC's ESG Team has been making preparations to launch a "Supplier Code of Conduct" in FY25 which will further reinforce MMC's standards and expectations of suppliers (including the elimination of forced labour and child labour).

**c) Forced labour and child labour risks**

JBH acknowledges that the risk of forced labour and child labour can exist in a supply chain either directly or indirectly, and recognizes the need for organizations to implement steps to identify and prevent these risks through appropriate supply chain due diligence. JBH has not previously began direct efforts to identify specific areas or activities in the supply chain that may pose such risks, aside from the work already undertaken by MMC. JBH relies on contracts facilitated through MMC who have confirmed their due diligence and compliance with the Act. As of today, JBH and MMC have not been made aware of any instances where forced labour or child labour exists in our current supply chain.

**d) Remediation measures**

JBH has exercised care and due diligence in the supply chain and to date, there are no known instances of forced labour and child labour within our supply chain.

**e) Remediation of loss of income**

JBH has exercised care and due diligence in the supply chain and to date, there are no known instances of forced labour and child labour within our supply chain.

**f) Training**

JBH continues to work with other hospitals, MMC, and the Ontario Hospital Association (“OHA”) to share progress on how to develop training material regarding the Act. JBH staff have participated in webinar sessions offered by the OHA, MMC and legal counsel related to the Act.

JBH has provided Environmental, Social and Governance (ESG) training (including that specific to Bill S-211), developed by MMC, 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.

**g) Assessing effectiveness**

JBH understands 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 to be incorporated into our organization. JBH continues to work closely with other entities such as OHA and MMC to incorporate policies, procedures and training for employees and explore possibilities to assess their effectiveness.

**References:**

1. JBH Code of Conduct Policy and Procedure 1-10-200
2. Ontario Human Rights Code, Ontario Human Rights Commission, website: [The Ontario Human Rights Code | Ontario Human Rights Commission \(ohrc.on.ca\)](https://www.ohrc.on.ca/)
3. Employment Standards Act, 2000 (ESA), Government of Ontario, Employment Standards Act, 2000, S.O. 2000, c. 41, website: [Employment Standards Act, 2000, S.O. 2000, c. 41 \(ontario.ca\)](https://www.ontario.ca/en/legislation/acts/employment-standards-act-2000)
4. Proponent Confirmation Form – JBH RFP Template
5. Representations, Warranties, Covenants – JBH Master Agreement Template
6. Navigating Compliance with Bill S-211 OHA/BLG Member Webinar – March 2024
7. MMC Member Bill S-211 Communication – dated January 10, 2024
8. MMC Reporting for the Fighting Against Forced Labour and Child Labour in Supply Chains Act letter – dated March 7, 2025