

## 2024-25 Annual Report on Forced Labour and Child Labour in Supply Chains

Attestation by the Board of Directors

---

### *Kemptville District Hospital*

Entity: Kemptville District Hospital  
2675 Concession Road, Kemptville, Ontario, Canada, K0G 1J0  
For the Fiscal Year April 1, 2024 – March 31, 2025  
Business Number: 107562514

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in the capacity of Chair of the Board of Directors, 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 above.

This report received approval from the Board of Directors of Kemptville District Hospital on May 29, 2025.

---

**Full name: Jeff Nolan**

**Title: Board Chair**

**Date: May 29, 2025**

**Signature:**   
Jeff Nolan (May 29, 2025 11:38 EDT)

I have the authority to bind Kemptville District Hospital



# Annual Report on Forced Labour and Child Labour in Supply Chains

*Kemptville District Hospital*

Fiscal Year: April 1, 2024, to March 31, 2025

## Introduction

Forced labour can be found in every country and every sector. The International Labour Organization estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through the global supply chains of businesses.

There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions doing business in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

The measures introduced (the *Supply Chains Act*) aim to increase industry awareness and transparency and drive businesses to improve practices.

Kemptville District Hospital ("KDH") is defined as an "Entity" under the *Supply Chains Act* and, therefore, must submit an annual report to the Minister of Public Safety by May 31 of each year. Reports must detail the steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used by KDH in our supply chains.

All reports will be made available to the public in two ways:

- In the Public Disclosures section on [KDH's website](#)
- In an electronic registry on [Public Safety Canada's website](#)

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

## Submission information

#	Question	Response
1	This report is for... (Mandatory)	An entity
2	Legal name of the reporting entity (Mandatory)	Kemptville District Hospital
3	Reporting deadline for which you are submitting (Mandatory)	31-May-25
4	Financial year covered by report (Mandatory)	April 1, 2024 to March 31, 2025
5	Is this a revised version of a report already submitted this reporting year? (Mandatory)	No
5.1	If yes, original submission date (Mandatory)	—
5.2	If yes, describe changes made (Mandatory)	—
6	For entities only: Business number(s)	107562514
7	For entities only: Is this a joint report? (Mandatory)	No
7.1	If yes, legal names of entities covered (Mandatory)	—
7.2	If yes, business number(s) of entities covered	—
8	For entities only: Is the entity also subject to reporting under another jurisdiction? (Mandatory)	No
8.1	If yes, select applicable law(s) (Mandatory)	—
9	For entities only: Which categorization(s) apply? (Mandatory)	<p><b>Canadian business presence:</b></p> <ul style="list-style-type: none"> <li>• Has a place of business in Canada</li> <li>• Does business in Canada</li> <li>• Has assets in Canada</li> </ul> <p><b>Meets size-related thresholds:</b></p> <ul style="list-style-type: none"> <li>• Has at least \$20 million in assets for at least one of its two most recent financial years</li> <li>• Employs an average of at least 250 employees for at least one of its two most recent financial years</li> </ul>
10	For entities only: In which sectors or industries does the entity operate? (Mandatory)	Health care and social assistance: <ul style="list-style-type: none"> <li>• Hospitals</li> </ul>
11	For entities only: In which country is the entity headquartered or principally located? (Mandatory)	Canada
11	If in Canada: In which province or territory is the entity headquartered or principally located? (Mandatory)	Ontario
12	For government institutions only: Government institutions only	Not applicable

## Annual Report - Reporting for entities

#	Question	Response
1	Which of the following accurately describes the entity's structure? (Mandatory)	Corporation
2	Which of the following accurately describes the entity's activities? Select all that apply. (Mandatory)	<ul style="list-style-type: none"> <li>• Importing into Canada goods produced outside Canada</li> </ul>
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. (Mandatory)	<ul style="list-style-type: none"> <li>• Mapping activities</li> <li>• Conducting an internal assessment of risks of forced labour and/or child labour in supply chains</li> <li>• Developing and implementing an action plan for addressing forced labour and/or child labour</li> <li>• Monitoring suppliers (quarterly risk reviews)</li> <li>• Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour</li> <li>• Engaging with supply chain partners on the issue of addressing forced labour and/or child labour</li> </ul>
4	Please provide additional information describing the steps taken (if applicable) (3,000 character limit)	<p>In FY 2024-25, KDH continued actions initiated in the previous year to mitigate the risks associated with forced labour and child labour within our supply chains.</p> <p>KDH procurement staff continued to track supplier activities through surveys previously conducted, focusing specifically on purchasing activities and suppliers based outside Canada. Most suppliers engaged by KDH have a Canadian branch responsible for ethical importing practices. Procurement from potentially higher-risk vendors, such as Amazon, remained centrally controlled by the Procurement team through the Canadian business account to ensure compliance with ethical procurement standards.</p> <p>An action plan established in the previous fiscal year remained in place. This plan involves quarterly monitoring of suppliers identified as higher-risk (e.g., international direct suppliers and Amazon). Staff education on ethical procurement continued through existing platforms, including the Surge Learning Portal, targeted emails, newsletters, and management updates. An annual review of this action plan is scheduled to assess its effectiveness and to identify necessary adjustments.</p> <p>KDH is committed to cooperation in any remediation efforts initiated by suppliers found to be at risk of forced labour or child labour within their own supply chains.</p> <p>Additionally, KDH actively cooperates with shared service organizations—particularly Champlain Health Shared Services (CHSS), Eastern Ontario Regional Laboratory Association (EORLA), Mohawk MedBuy, Queensway</p>

Carleton Hospital (QCH), and Compass—to align and support broader ethical procurement initiatives and mitigation strategies across the region.

<p>5 Does the entity currently have policies and/or due diligence processes in place related to forced labour and/or child labour? (Mandatory)</p>	<p>Yes</p>
<p>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. (Mandatory)</p>	<ul style="list-style-type: none"> <li>• Embedding responsible business conduct into policies and management systems</li> <li>• Communicating how impacts are addressed (internal updates)</li> <li>• Providing for or cooperating in remediation when appropriate</li> </ul>
<p>6 Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Mandatory)</p>	<p>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.</p>
<p>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. (Mandatory)</p>	<ul style="list-style-type: none"> <li>• The types of products it sources (PPE, medical devices, textiles)</li> <li>• Tier two (indirect) suppliers</li> <li>• The use of outsourced or contracted labour (e.g., laundry, catering)</li> </ul>

<p>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? Select all that apply. (Mandatory)</p>	<ul style="list-style-type: none"> <li>• Health care and social assistance – Hospitals</li> </ul>
<p>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) (3,000 character limit)</p>	<p>KDH recognizes that forced and child labour risks may exist within its medical supplies and equipment supply chains, particularly where components are sourced indirectly through multiple tiers. While we have not identified any actual instances of non-compliance, we continue to refine our assessment to close existing gaps.</p> <p>To manage these potential risks, KDH:</p> <ul style="list-style-type: none"> <li>• Engages closely with procurement partners—Champlain Health Shared Services (CHSS), Queensway Carleton Hospital (QCH), Mohawk MedBuy, Compass Group, The Ottawa Hospital (TOH), and the Eastern Ontario Regional Laboratory Association (EORLA)—leveraging their established policies, procedures, and due-diligence tools to vet suppliers and trace origin.</li> <li>• All supplier agreements include clear clauses requiring compliance with Canadian and international labour laws and banning forced or child labour.</li> <li>• For high-risk vendors (e.g., Amazon), we purchase only through their Canadian offices to ensure adherence to our standards.</li> <li>• Provides ongoing training for Procurement and Materials Management staff via the Surge Learning Portal and in-person sessions.</li> <li>• Collaborates with partners and suppliers on remediation: If a supplier reports an issue, we work together on a corrective action plan and monitor progress closely.</li> </ul> <p>Going forward, we plan to create a survey for vendors to gather insights and feedback. Additionally, we will update our competitive process to better incorporate the requirements of the law, ensuring compliance and transparency. We will also focus on educating managers and those involved in purchasing beyond the core team to enhance their understanding of the new regulations. We intend to collaborate with regional partners, such as TOH, to explore the tools they are using and identify best practices that can be implemented within our organization</p>
<p>9 Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Mandatory)</p>	<p>Not applicable – we have not identified any instances of forced labour or child labour in our supply chains.</p>

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? (Mandatory)	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? (Mandatory)	Yes
11	If yes, is the training mandatory? (Mandatory)	Yes, the training is mandatory for some employees.
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? (Mandatory)	Yes
12	If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Mandatory)	<ul style="list-style-type: none"> <li>• Tracking relevant performance indicators (training completion rates)</li> <li>• Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour</li> </ul>

