



Briefing Note: Bill S-211 an Act to Enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Date: March 21, 2025

Prepared for Board of Directors

Background

Bill S-211 an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) imposes obligation on certain government institutions and private-sector entities to report on measures taken to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains.

This enactment also amends the Customs Tariff to allow for a prohibition on the importation of goods manufactured or produced, in whole or in part, by forced labour or child labour as those terms are defined in the Act.

Lake of the Woods District Hospital (LWDH) is a non-profit health care provider operating as a corporation in the province of Ontario, governed by its Board of Directors. LWDH purchases a broad array of goods, services, and construction. LWDH falls within the prescribed definition of a reporting Entity under the Act.

Response to Reporting Requirements

LWDH uses a shared services organization, Mohawk Medbuy, for many purchasing activities. Mohawk Medbuy is taking action to modify their contract language and its competitive procurement templates. Mohawk Medbuy is not aware of any instances where forced labour or child labour exists in current supply chains and is committed to sustainability practices.

LWDH is committed to ensuring that there is no forced labour and child labour in our supply chains or in any part of our business. The Act aligns with the business culture of our organization, which includes the supply chain code of ethics.

Supply Chain Code of Ethics

I. Personal Integrity and Professionalism

- *All individuals involved with purchasing or other supply chain-related activities must act, and be seen to act, with integrity and professionalism.*
- *Honesty, care and due diligence must be integral to all supply chain activities within and between Broader Public Sector (BPS) organizations, suppliers and other stakeholders.*
- *Respect must be demonstrated for each other and for the environment.*
- *Confidential information must be safeguarded.*
- *All participants must not engage in any activity that may create, or appear to create, a conflict of interest, such as accepting gifts or favours, providing preferential treatment, or publicly endorsing suppliers or products.*

II. Accountability and Transparency

- *Supply chain activities must be open and accountable. In particular, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for public money.*
- *All participants must ensure that public sector resources are used in a responsible, efficient and effective manner.*

III. Compliance and Continuous Improvement

- *All individuals involved in purchasing or other supply chain-related activities must comply with this Code of Ethics and the laws of Canada and Ontario.*
- *All individuals should continuously work to improve supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share leading practices.*

LWDH's supply chain code of ethics aligns with the Act and its supply chain management group has implemented additional language and templates in response to the Act.

**Prepared by Kelsey Geisel, CPA, CA
Director of Finance & CFO**



**Lake of the Woods
District Hospital**

Approval and Attestation

Bill-211 Act to Enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act

From: The Board of Directors (the "Board") of the Lake of the Woods District Hospital

Date: April 10, 2025

Re: January 1, 2024 to December 31, 2024

The Board has authorized me, by resolution dated April 10, 2025, to declare and attest to you as follows:

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.

I have the authority to bind the Lake of the Woods District Hospital.

**Fred Richardson
Board Chair
Lake of the Woods District Hospital
April 10, 2025**

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 cursive script that reads "Janice Mundell".

Janice Mundell
Chief Marketing Officer and
Senior Vice President,
Strategy

A handwritten signature in cursive script that reads "Peter Longo".

Peter Longo
Chief Operating Officer