

niagarahealth

Extraordinary Caring. Every Person. Every Time.

***Bill S-211: Fighting Against Forced Labour  
and Child Labour in Supply Chains Act***

**Annual Report**

Financial Period: April 1, 2024, to March 31, 2025

**Niagara Health System**


**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:** The Board of Niagara Health System, (the “Board”)  
**FROM:** Lynn Guerriero  
President & Chief Executive Officer  
Niagara Health System  
**Date:** May 27, 2025  
**REPORTING PERIOD:** April 1, 2024, to March 31, 2025

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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 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 Niagara Health System.



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**Lynn Guerriero**  
President & Chief Executive Officer  
Niagara Health System  
May 27, 2025.

I certify that this attestation has been approved by the Niagara Health System on  
May 27, 2025.



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**Marylee O'Neill**  
Chair, Board of Directors  
Niagara Health System

## Summary of Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour

Niagara Health System ("Niagara Health", "NH") is committed to preventing and reducing the risk of forced labour and child labour and has taken the following measures during the reporting period.

- ***Supply Chain Mapping and Risk Assessment***

NH Strategic Sourcing has conducted a vendor mapping exercise to strengthen oversight of its supply chain. This includes compiling a catalog of all direct vendors and suppliers, covering distributors, manufacturers, contractors, and logistics partners. Each vendor has been assessed for potential child labour risks based on factors such as sourcing countries and industry-specific concerns. Additionally, NH has implemented an attestation process requiring existing vendors to disclose their labour practices, supplier country, and processes and practices implemented by vendor organization to reduce and prevent risk of forced and/or child labour. These efforts ensure greater transparency and accountability within the supply chain.

- ***Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily***

NH has introduced measures to ensure that all job applications are submitted voluntarily. A confirmation statement is now a part of the application process, wherein candidates confirm that they are applying of their own free will and without any external coercion. This step reinforces NH's commitment to ethical recruitment practices and ensures transparency in employment applications.

- ***Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour***

NH continues to collaborate with Mohawk Medbuy Corporation (MMC) and other hospital organizations to share best practices and enhance efforts to combat forced labour and child labour. This collaboration includes initiatives such as Environmental, Social, and Governance (ESG) education, vendor mapping discussions, and joint strategies to strengthen ethical sourcing and compliance frameworks.

# Reporting Requirements

## I. Structure, Activities and Supply Chains

### *Organizational Structure*

The Niagara Health System ("Niagara Health", "NH") is a multi-site hospital corporation comprised of five (5) sites serving over 478,000 residents across the twelve (12) municipalities of the Regional Municipality of Niagara. Niagara Health is made up of more than 7,300 employees, physicians, volunteers and patient partners who contribute to NH's purpose of providing Extraordinary Caring. Every Person. Every Time.

More information on the services provided at each site can be found below:

- [Fort Erie Site](#)
- [Niagara Falls Site](#)
- [Port Colborne Site](#)
- [St. Catharines Site](#)
- [Welland Site](#)

The construction of a new South Niagara Hospital began in Summer 2023 with occupancy planned for 2028. Following an open and competitive procurement process in collaboration with Infrastructure Ontario (IO), Ellis Don Infrastructure Healthcare ("EDIH") was awarded the contract to design, build, finance and maintain this new site. The 1.3 million-square-foot hospital will be twelve (12) stories tall and will have up to 469 beds, a majority of which will be net new, increasing NH's capacity to provide inpatient services for the region.

### *Niagara Health's core activities include:*

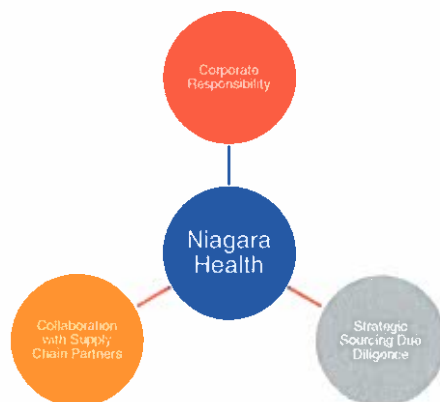
- The provision of inpatient and outpatient clinics and services, including acute, surgical, emergency and urgent, kidney, complex, mental health and addition, long term and cancer care. A full list of services is available [here](#).
- Working closely with more than 90 academic partners to advance medical education, research and knowledge.

### *Niagara Health's supply chain activities*

Supply chain activities are primarily the procurement and procurement of medical supplies and equipment to support patient care. Niagara Health's purchasing hierarchy directs that product and equipment are primarily sourced through MMC initiatives. NH Strategic Sourcing and Logistics independently runs RFXs for services and renovations. All procurement activities for the South Niagara Hospital are run by the Furniture, Fixtures and Equipment (FF&E) project team. Small quantities of chargeable clinical, ED and physio items such air casts, crutches and splints are sold to patients.

## II. Policies and Due Diligence Processes

At Niagara Health, the core values of compassion in action, driven by optimism, and achieving ambitious results guide all decision making and behaviours. NH acknowledges the importance of providing an environment where all are treated with respect and dignity and has embedded this responsibility into the following policies and processes.



### **Corporate Responsibility**

#### ***Employment Policies***

The employment of all staff (permanent, full-time, part-time, casual) is governed by NH employment policies. These comply with the *Employment Standards Act, 2000 (ESA)* which ensures fair employee treatment and sets minimum standards for workplaces in Ontario regarding minimum wage, hours of work limits, termination of employment, severance pay, vacation and more.

#### ***Employee Code of Conduct***

The Employee Code of Conduct and Mutually Respectful Workplace and Diversity Policy provide overall guidance on workplace conduct and relations. NH staff are expected to treat others equitably, with respect, dignity, understanding and acceptance. Unacceptable behaviours include bullying, harassment, and intimidation. Both policies are compliant with the Ontario Human Rights Code which prohibits discriminatory actions against people based on a protected ground in a protected social area.

#### ***Whistleblower Policy***

NH is committed to the highest standards of business and ethical conduct and values openness and transparency in all matters of business. This policy encourages and enables the reporting of alleged or potential wrongdoings relating to violation of policies, ethical behaviours or business conduct, including those related to the use of forced and/or child labour by NH or supply chain partners. These reports, when made in good faith, ensure without fear of reprisal and ensures protection the confidentiality of those making the report.

## **Strategic Sourcing Due Diligence**

### ***Supply Chain Mapping and Risk Assessment***

NH Strategic Sourcing and Logistics has implemented a structured approach to mapping its supply chain to strengthen oversight and mitigate the risk of forced and child labour. This approach includes compiling a comprehensive catalog of all direct vendors and suppliers, including distributors, manufacturers, contractors, and logistics partners, ensuring complete visibility into NH's supply chain. A supplier attestation form was sent out to existing vendors and required vendors to attest that their supply chain in no way involves forced or child labour, and outline the policies and procedures their organizations have in place to prevent and mitigate forced and child labour risks. The attestation process required vendors to disclose information about their labour practices, supplier locations, and adherence to child labour laws. These efforts reinforce NH's commitment to ethical sourcing and ensure that vendors are actively engaged in maintaining a transparent and compliant supply chain.

### ***Ensuring Voluntary Worker Recruitment and Strengthening Internal Controls***

NH has taken measures to ensure that all workers recruited within the organization do so voluntarily and without coercion. A voluntary application confirmation has been incorporated into NH's job application process, requiring candidates to acknowledge that they are applying for employment voluntarily. This measure ensures that applicants are not under any undue pressure to apply and that NH maintains a fair and transparent recruitment process. Through this confirmation in all employment applications, NH upholds ethical recruitment practices and ensures compliance with labour laws.

### ***Partnerships with Mohawk Medbuy Corporation***

A large portion of NH's purchasing activity is made using MMC contracts. NH continues to collaborate with Mohawk Medbuy Corporation (MMC) to strengthen efforts in addressing forced and child labour. MMC has confirmed the following:

- Provided Environmental, Social, and Governance (ESG) education training including specific to Bill-S211 to all relevant employees.
- Issued a "Supplier Risk Assessment" in September 2024 to their top 200 suppliers.
- Their ESG team is preparing to launch a "Supplier Code of Conduct" in FY25 to reinforce standards and expectations of suppliers.

NH has worked closely with MMC and other hospital organizations to share best practices to address and eliminate forced and child labour risks.

## **III. Risks and Management of Risks**

We have not yet identified any risks.

#### **IV. Remediation of Risks**

We have not identified any risks.

#### **V. Remediation of Loss of Income to Most Vulnerable Families**

We have not identified any risks.

#### **VI. Employee Training and Communications**

- At this time, all employees responsible for contracting and sourcing of products and services within the Strategic Sourcing, Logistics, and Redevelopment Teams have received training on Bill S211 and corporate policies and procedures.
- Bill S-211: Fighting Against Forced Labour and Child Labour in Supply Chains Act Annual Report will be posted on website week of June 3<sup>rd</sup>.

#### **VII. Ensuring Effectiveness**

NH Strategic Sourcing and Logistics regularly reviews and audits the organization's policies and procedures related to forced labour and child labour and compliance with legislative requirements.