



Attestation Report F2024-25

Fighting Against Forced Labour and Child Labour in Supply Chains Act

Background

This report is produced by Royal Victoria Regional Health Centre (“RVH”) located at 201 Georgian Drive, Barrie, Ontario L4M 6M2, for the fiscal year 2024-2025 (the “Financial Reporting Year”).

This report constitutes the first report submitted by RVH, a nonprofit corporation in the public healthcare sector, pursuant to Canada’s new Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”).

In this report, RVH sets out the steps taken to prevent and reduce the risk that forced labour or child labour is used throughout the procurement supply chain.

1. Steps to prevent and reduce risks of forced labour and child labour

Respecting human rights is a fundamental corporate responsibility and a core value that guides all our activities at RVH. RVH prioritizes human rights in every aspect of our procurement operations and hold our suppliers to the same high standards.

Suppliers were asked to attest that no forced or child labour is used in the business activities and supply chain, that they are developing and implementing due diligence policies and processes for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains. RVH also engaged with supply chain partners on the issue of addressing forced labour and/or child labour.

Standard contract language has been revised 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 Chains Act).*

Modified competitive procurement templates such as request for proposals (RFP) to include the following language that suppliers/vendors bidding for RVH 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);

RVH will leverage its group purchase organization as they are formalizing a commitment to sustainability and Environmental, Social, Governance (ESG) practices through the creation of a dedicated ESG team. The group will be responsible for program development to ensure our organization's ongoing sustainability, and to support RVH as an enabler of a cohesive, sustainable health care supply chain.

2. Structure, activities, and supply chains

RVH is a regional hospital with many specialized programs. RVH continues to grow and expand the services and procedures offered to the community resulting in nearly 500,000 patient visits, 2,000 babies born, and 13,000 surgeries. Team RVH continues to grow with nearly 3,600 staff, 475 physicians and over 200 volunteers filling the campus each day. RVH does depend sometimes on the procurement of goods imported or produced from outside of Canada. RVH is a customer of the Group Purchasing Organization, Mohawk Medbuy, who assists us in tendering and contracting with suppliers for medical supplies, equipment, and construction services. RVH also relies on Cardinal Health as its distribution centre to provide just in time stock to our hospital twice a week. Both organizations have provided attestation reports to RVH that they are striving and committed to ethical procurement practices.

3. Policies, Governance and Due Diligence processes

RVH's procurement policy incorporates the hospital's Code of Ethics which must be adhered to in all procurement activities on behalf of the organization. Additionally, the Vendor Code of Conduct will be updated to explicitly address and prohibit forced labour and child labour. RVH is embedding responsible business conduct into policies and management systems. RVH's due diligence regarding forced labour is through the development of clear policies and training staff and suppliers on anti-forced labour standards.

4. Steps to assess and manage risk

At RVH, we take the risk of forced labour and child labour in our supply chain very seriously. RVH has identified that although very low, there is potential for risk in some areas such as in the procurement of supplies from abroad and online ordering from e-commerce companies. This is mitigated in the following ways:

- BOBI: Incorporating the Building Ontario Business Initiative criteria into our tender evaluations to give Ontario and Canadian businesses a competitive advantage in securing contracts. This reduces the supply chain gap between RVH and the supplier for goods and services purchased.
- Vendor Code of Conduct: Revisions of the Vendor Code of Conduct to include stringent clauses against the use of forced labour and child labour. This code will be a mandatory part of all supplier agreements and request for proposals.
- Annual assessments and audits to ensure compliance.

- Establishing clear communication channels with MMC and Cardinal Health to promptly address any alerts or perceived issues.

By implementing these steps, RVH aims to prevent the risk that our supply chains are free from forced labour and child labour, thereby upholding our commitment to ethical practices and human rights.

5. Remediation Measures

If a supplier is suspected to be in breach, RVH will develop and implement a corrective plan to effectively address the issue and put measures to immediately remedy to situation. MMC will be advised to alert other hospitals of the situation.

6. Training

Training and Awareness: All new hires at RVH will receive training on forced labour and child labour laws under our procurement policy as part of their onboarding process. Recognizing the risks and indicators of forced labour and child labour will ensure vigilance in identifying potential issues.

7. Effectiveness Assessment


Continuous improvement and key contributors' engagement will help maintain effective practices and uphold human rights commitments. An annual review will be conducted to ensure our processes remain robust and secure, without any vulnerabilities.

8. Approval and Attestation

This report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board Chair acting on behalf Board of Directors of RVH.


In accordance with the requirements of the Act, and in particular section 11 thereof, we, the undersigned, attest that we have reviewed the information contained in this report for the entity listed above. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Full Name: Gail Hunt
Title: President & CEO

Signature: 
I have the authority to bind RVH

Date: **05/28/2025**

Full Name: Jason Teal
Title: Board Chair

Signature: 
Signature: [Jason Teal \(May 28, 2025 19:03 EDT\)](#)
I have the authority to bind RVH

Date: **05/28/2025**

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

Janice Mundell
Chief Marketing Officer and
Senior Vice President,
Strategy

Peter Longo
Chief Operating Officer