

# Bill S-211 Report - Fighting Against Forced Labour and Child Labour in Supply Chains Act

## Introduction

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This report is VitalHub Corp. and all its subsidiaries (collectively “VitalHub”)’s response to Bill S-211, an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Act”). VitalHub’s subsidiaries include the following entities:

- Vitalhub Corp.
- H.I. Next LLC
- Vitalhub (PVT) Ltd (Incorporated in Sri Lanka)
- Coyote Software Corporation
- VitalHub UK Limited (formerly - The Oak Group UK Limited)
- S12 Solutions Limited
- Hicom Technologies
- MyPathway Solutions Limited
- Vitalhub Australia PTY Ltd
- QWAD Community Technologies Pty Ltd operating as Community Data Solutions
- BookWise Solutions Limited
- BookWise Solutions Pty Ltd
- Premier I.T. Partnership Limited
- Medcurrent UK Ltd
- Medcurrent Corporation
- Strata Health Solutions Inc.
- Strata Health Ltd. (UK)
- Strata Health (US) Corporation
- Strata Silver LLC

VitalHub is committed to the protection of human rights in all our business practices and operations. This includes the prevention of modern slavery, forced labour and child labour in both our internal business practices and supply chain operations.

VitalHub satisfies the definition of an Entity within the Act as a publicly traded corporation that is listed on a stock exchange in Canada.

The financial reporting year of VitalHub covered by this report is January 1 to December 31, 2024.

# Structure, Activities & Supply Chain

## Structure

VitalHub operates as a public corporation with four (4) physical locations in the following countries - Canada, the United Kingdom of Great Britain and Northern Ireland (the "United Kingdom"), Sri Lanka, and Australia. In addition, we have remote staff working out of Belarus, Poland, Serbia, United States and the United Arab Emirates (UAE).

VitalHub provides technology to Health and Human Service providers including Hospitals, Regional Health Authorities, Mental Health, Long-Term Care, Home Health, Community and Social Services.

## Activities

VitalHub operates within the technology services industry providing a wide range of solutions, spanning the categories of Electronic Health Records (EHR), Case Management, Case Coordination, Patient Flow, and Operational Visibility and Mobile Apps.

There are a total of 529 employees who work for VitalHub across different locations. Figure 1 illustrates the distribution of VitalHub's employees across various locations.

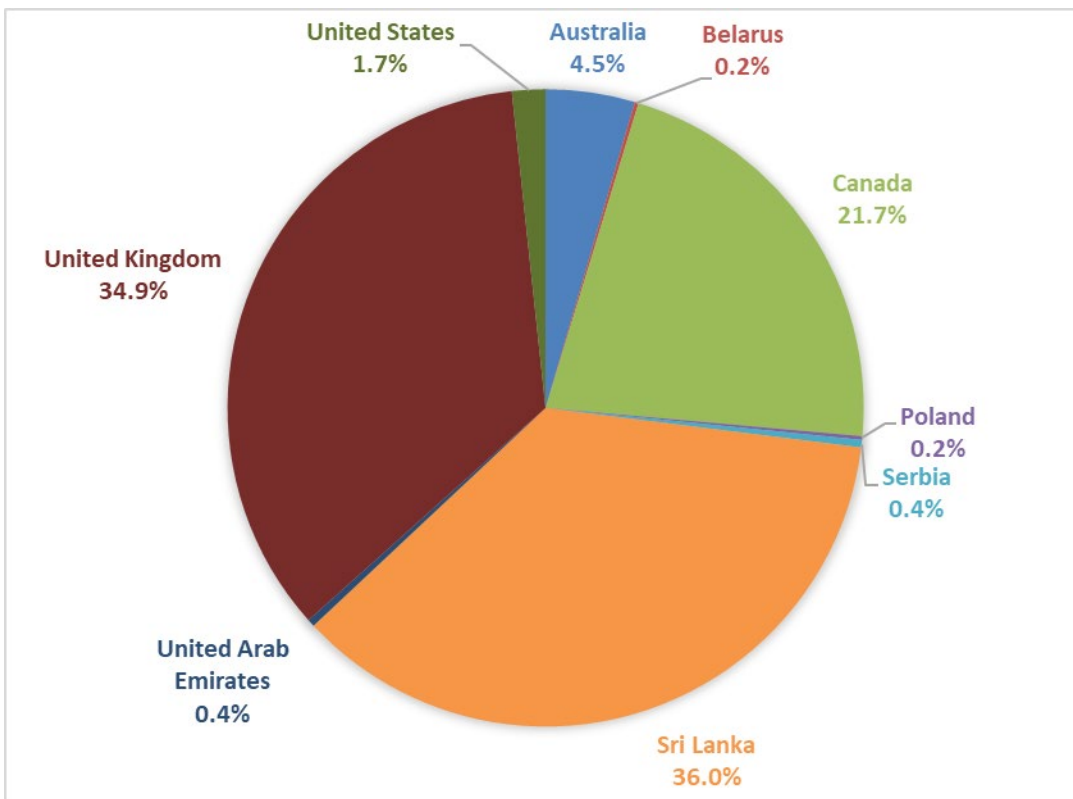


Figure 1

## Supply Chain

As a software service provider (i.e., SaaS, maintenance and support and professional advisory services), VitalHub also sells some electronics – including kiosks, media players, and calling screens. Our clients typically depend on us to source and install these products for them, which are integral components of our patient flow solutions.

VitalHub has one (1) direct supplier from the United Kingdom in fiscal year 2024 and one (1) direct supplier in Australia. *Note, this analysis was performed solely over physical goods suppliers.*

*Note, this report focuses on the locations and practices of the divisions of our company related to goods. While we have employees working in countries where there is a higher inherent risk of child labour and/or forced labour, such as Sri Lanka and the UAE, it is important to highlight that we do not engage any suppliers from these regions. VitalHub is committed to upholding ethical standards and ensuring that all individuals within our company, including those in higher-risk regions, meet the legal requirements specific to each jurisdiction, and have an awareness of forced labour and child labour.*

## Policies & Due Diligence Processes

VitalHub has the following policies and due diligence procedures in place to mitigate the risk of child labour and forced labour within internal activities and our supply chain:

### Internal Policies

VitalHub has overarching policies that apply to the entire organization and all our subsidiaries. Additionally, each subsidiary, operating within diverse legal jurisdictions, has developed specific policies aligned with the regulatory requirements of its respective local legislation. Policies that are common across the subsidiaries include:

Policies within Employee Handbooks	Description	Support in Mitigating Risk of Child Labour and/or Forced Labour
<b>Equal Opportunity (EDI) Policy</b>	VitalHub is committed to equal opportunities in employment, to reflecting the diverse communities it serves, and to practicing cooperation, respect, and openness with its employees, customers, and candidates. We welcome applications from all minority group members, women, Aboriginal persons, persons with disabilities, members of sexual minority groups, and others who may contribute to the further diversification of ideas.	Our policy provides a framework for VitalHub to promote equality within our business operations, contributing to reducing the marginalization of certain groups who are more vulnerable to exploitation such as children and at-risk adults. By raising awareness, we can play a crucial role in advancing the fight against exploitation and abuse in global supply chains.

<p><b>Anti-Discrimination, Anti-Harassment and Bullying Policy</b></p>	<p>VitalHub is committed to providing an environment free of discrimination and harassment, where all individuals are treated with respect and dignity, can contribute fully, and have equal opportunities. VitalHub has zero tolerance towards harassment or victimisation on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation. For transparency purposes, the handbooks define various acts of harassment, discrimination, and bullying.</p>	<p>Our policy contributes to fostering a workplace culture that prioritizes safety, respect, and dignity for all employees. By establishing zero tolerance for discrimination and harassment, this policy creates an environment where employees feel safe and empowered to report any instances of misconduct, including suspected cases of child labour or forced labour.</p>
<p><b>Whistleblower Policy</b></p>	<p>This policy governs the reporting and investigation of allegations of suspected improper activities in respect of accounting, internal controls, or auditing matters, violation of law, and general violations of the Code of Conduct.</p>	<p>If an issue were to arise related to forced labour or child labour, this reporting process is a mechanism in place to identify and alert the management of VitalHub who then would tend to the resolution efforts.</p>
<p><b>Protection of Whistleblowers Policy</b></p>	<p>This policy ensures that VitalHub will not discharge, demote, suspend, threaten, harass, or in any manner discriminate or retaliate, and will not condone any retaliation by any person or group, directly or indirectly, against any reporting individuals.</p>	<p>This policy will allow employees to express any concerns related to forced labour or child labour without fear of retaliation.</p>
<p><b>Health and Safety Policy</b></p>	<p>VitalHub is committed to ensuring the health and safety of the workplace and will take every reasonable precaution possible for the protection of everyone, including employees, customers, vendors, and visitors. All employees are required to cooperate with these efforts to ensure safe working and to report any concerns</p>	<p>By prioritizing health and safety, we ensure that employees, customers, vendors, and visitors are provided with a secure workplace environment. In such an environment, the risk of exploitation, including forced labour and child labour, is minimized. In addition, emphasizing health and safety also demonstrates broader</p>

	to management.	organizational values and ethical conduct, and transparency within our organization. This transparency can extend to labour practices, making it easier to identify and address any instances of forced labour or child labour.
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The following policies and/or initiatives are applicable to specific subsidiaries/regions:

*Employee Policy Handbook (United Kingdom)*

<b>Policies within the UK Employee Handbook</b>	<b>Description</b>	<b>Support in Mitigating Risk of Child Labour and/or Forced Labour</b>
<b>Modern Slavery Policies and other relevant policies</b>	<p>VitalHub’s staff in the UK are provided with the following policies as part of their induction:</p> <ul style="list-style-type: none"> <li>• Modern Slavery Policy</li> <li>• Whistleblowing Policy</li> <li>• Bullying and Harassment Policy</li> <li>• Diversity and Inclusion Policy</li> <li>• Recruitment and Selection Policy</li> </ul>	<p>We seek to improve our compliance with Modern Slavery obligations by providing awareness training to staff on Modern Slavery and informing them of the appropriate action to take if they suspect a case of Modern Slavery and ensuring that consideration of the Modern Slavery risks and prevention are included in our policy review process as an employer and procurer of goods and services.</p>
<b>Anti-Bribery Policy</b>	<p>It is prohibited, directly or indirectly, to offer, give, request, or accept any bribe (i.e., gift, loan, payment, reward, or advantage, either in cash or any other form of inducement), to or from any person or company in order to gain commercial, contractual or regulatory advantage for VitalHub, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical. For transparency purposes, the policy defines the terms “bribery” and “corruption.”</p>	<p>Forced labour and child labour often occur in industries or regions where bribery and corruption are prevalent. By implementing robust anti-bribery measures, we can reduce the risks of exploitation and abuse faced by vulnerable workers, including children. In addition, preventing bribery creates a transparent business environment where labour rights are respected and enforced.</p>

**Due Diligence Processes**

Similar to internal policies, each subsidiary also has its own due diligence processes. These individualized approaches

offer valuable insights into potential enhancements that could be implemented across the organization in the future. By reviewing and refining these processes across all subsidiaries, we aim to cultivate a more cohesive and standardized due diligence framework that could support in mitigating the risk of forced labour and child labour in our operations and supply chain.

*Supplier Selection and Onboarding (all subsidiaries):*

VitalHub conducts site visits and carefully examines a range of documentation, including health and safety policies, modern slavery statements, and financial records, among others, when assessing potential relationships with new suppliers. To ensure the selection of reputable and reliable partners, our evaluation includes a close examination of the company's past performance and track record, references, reputation, and financial stability.

*Monitoring and Evaluation (the United Kingdom):*

As part of our efforts to monitor and reduce the risk of Modern Slavery occurring within our supply chains, we have an approved supplier list, follow a purchasing process, and carry out supplier evaluations. We ask for confirmation of their Quality & Information Security Management Systems, Modern Slavery Statement, and the Standards and Certifications they comply with, follow, or are accredited with.

Our procedures are designed to:

- Establish and assess areas of potential risk in our business and supply chains.
- Monitor potential risk areas in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Provide adequate protection for whistle-blowers.
- Ensure we hire workers who have not been subject to human trafficking.
- Ensure every worker receives a legal wage and fair working conditions.

We use the following to measure our compliance with Modern Slavery obligations:

- How many employees have completed training?
- How many suppliers have completed our audit questionnaire?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?

Furthermore, we conduct periodic site visits to ensure our suppliers adhere to the Modern Slavery Act and maintain satisfactory working conditions. In addition, we perform audits of our supplier's ISO 9001 certification on a triannual basis and ensure ISO 27001 certification.

*Terms and Conditions (all subsidiaries)*

All vendors are bound by the terms they sign, which are stated in the purchase orders/invoices. Terms vary per agreement.

*Recruiting (Canada and the United Kingdom)*

From an operational perspective, as a condition of employment, new employees must present documentation establishing their identity and their eligibility to legally work in Canada or other countries where VitalHub operates.

In Canada, new employees must provide VitalHub with a valid Social Insurance Number, landed immigrant papers, employment visa, or temporary work permit. This provides VitalHub with an opportunity to detect that all newly hired employees are legally eligible to work in Canada and are of legal age.

In the United Kingdom, we ensure that individuals have the right to work, safeguarding against any potential involvement in human trafficking. Additionally, all employees are verified by a third-party agency, encompassing background checks, criminal screenings, and verification of two forms of identification. This digital identification is via a

UK Government certified Identity Services Provider (Yoti); all data is securely protected by 256-bit encryption, the company is SOC2 compliant and certified to ISO27001. The age verification is compliant with the British Standards Institution's PAS 1296:2018 code of practice.

## Supply Chain Risk Assessment

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A risk assessment over VitalHub's industry of operation, goods procured, and countries goods are procured from has been performed over material direct suppliers. This risk assessment used two separate indices to conclude on the inherent risk of child labour and/or forced labour related to goods and countries - Walk Free's Global Slavery Index and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor.

### Industry of Operation

VitalHub operates within the industry of software services. Given the two indices noted above have not identified risks of child labour and forced labour inherent to software services, it is concluded that this industry has a **low inherent risk** exposure.

### Goods Procured

A risk assessment has been conducted over the goods procured by VitalHub and identified an initial **extreme inherent risk** of forced labour and/or child labour within the following category:

- Electronics – Kiosks, media players, and calling screens

### Countries Which Goods Are Procured From

100% of goods procured in 2024 came from the United Kingdom. According to the two indices noted above, the United Kingdom has been identified as a source country that has a **low inherent risk** of using both child labour and/or forced labour. This does not mean that evidence of forced labour or child labour does not exist in our supply chain, but that there is a low inherent risk based on the identified countries of purchase. At this time, it is unknown to VitalHub where these vendors purchase their goods/materials from, which could expose the supply chain to inherent risk related to the originating source countries.

## Remediation of Forced Labour & Child Labour and Vulnerable Family Income Loss

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VitalHub is in the process of understanding and evaluating our supply chain related to the risk of child labour and forced labour. To date, VitalHub has not identified instances of the use of child labour or forced labour within our operations or those of suppliers. We are continuing our review of procurement practices to enhance the rigor of our due diligence processes including raising awareness with our suppliers.

## Awareness Training

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VitalHub (UK) employees have access to an online training course on Modern Slavery. This course aims to raise awareness of the types of modern slavery, the key signs to look out for, how to prevent it, tackle it, and report it. VitalHub recognizes the opportunity to enhance employee training relevant to this Act, therefore, will be implementing this training for all staff in all locations in the foreseeable future.

When onboarding new employees, part of this process includes reviewing the Employee Handbooks to ensure the individual understands the company's standards and expectations. Sections within these handbooks relevant to child labour and forced labour include: Modern Slavery Policy, Equal Opportunity Policy, Anti-Discrimination, Anti-Harassment, and Bullying, Whistleblower and Whistleblower Protection Policy, and Health and Safety.

## Mitigating Activities/Assessing Effectiveness

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To mitigate and to track VitalHub's effectiveness of procedures to mitigate the risk of child labour and forced labour, the following mechanisms are in place:

### VitalHub Activities

1. **Total harassment, discrimination, and bullying incidents:** VitalHub has zero tolerance for workplace harassment, discrimination, and bullying. All formal complaints made regarding any of these misconduct incidents will be reported to Human Resources including an investigation and action plan to resolve the issue in a timely manner. If an employee is found to be guilty of misconduct, he or she may be subject to disciplinary action depending on the seriousness of the offense.
2. **Employee Training:** Courses regarding child labour and forced labour (or modern slavery) will be offered to all employees, and VitalHub will track employee training completion metrics to ensure the completeness of these courses.
3. **Governance:** VitalHub will continue to monitor and assess compliance with the Employee Handbooks and review identified policies on an as-needed basis. VitalHub is currently constructing a global repository of all policies to enable higher visibility and greater access by employees.

### Supplier Activities

1. **Purchase Orders/Invoices/Supplier Contracts:** VitalHub will review opportunities to indicate in future purchase orders, invoices, or supplier contracts zero tolerance for child labour and forced labour.
2. **Supplier Audit Form:** VitalHub has implemented a supplier audit form designed to assess whether suppliers have a modern slavery statement in place. VitalHub has recognized an opportunity to enhance this form by incorporating additional inquiries concerning suppliers' labour practices, particularly focusing on issues related to forced labour and child labour.
3. **Supplier Monitoring:** Key suppliers of VitalHub will be monitored on a regular basis, either through performance reviews or onsite visits. Record keeping for frequency of reviews and date of last review is kept in a centralized system to ensure these reviews are being performed.
4. **Governance:** Each parameter of supplier activities will be reviewed on an as-needed basis.

## Steps Taken to Prevent & Reduce Risk of Child Labour or Forced Labour

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VitalHub has taken the following steps to prevent and reduce the risk of child labour or forced labour:

1. **Mapping supply chains:** As part of this report, VitalHub has mapped our supply chain to complete a risk assessment to align with the Act.
2. **Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains:** As part of this report, VitalHub has identified risks within our activities and supply chain that have inherent risks of child labour and/or forced labour.
3. **Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains:** As part of this report, VitalHub assesses the risks associated with the goods procured against global forced labour and child labour benchmarks and indices.
4. **Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily:** Human resources check new employee information to ensure they are legally permitted to work at VitalHub. Future checks will evaluate additional aspects of the recruitment process.
5. **Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour:** Remediation efforts relating to due diligence mechanisms in place have been identified, to reduce the risk of child labour and/or forced labour within the supply chain.
6. **Developing and implementing anti-forced labour and/or child labour contractual clauses:** VitalHub has identified the opportunity to integrate contractual clauses within our purchase orders, invoices, or supplier contracts related to anti-forced labour and/or child labour.
7. **Developing and implementing training and awareness materials on forced labour and/or child labour:** VitalHub is in the process of developing employee training relevant to child labour and/or forced labour.

## Attestation

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.

BRIAN GOFFE-LORLO

Full Name



Signature

CFO & EVP

Title

28 MAY 2025

Date

I have the authority to bind VitalHub Corp. and this report covers the financial year 2024 and applies to VitalHub Corp. and all entities considered reporting entities in terms of the Act and any controlling subsidiaries of VitalHub Corp. if they apply.