

Modern Slavery Report 2024

Winchester District Memorial Hospital



This Modern Slavery Report (the “**Report**”) addresses the period from April 1, 2024 to March 31, 2025 (“**Fiscal 2024**” or the “**reporting period**”) and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). This Report is made on behalf of the Winchester District Memorial Hospital (“**WDMH**”, or “**we**” or “**our**” or “**us**”) in respect of the actions taken to prevent and reduce the risk of forced labour and child labour in our business and supply chains.

1. Introduction

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading healthcare business, the WDMH recognizes the important role that we have in ensuring that our operations and products, and the supply chains that support these, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the steps we have taken during Fiscal 2024 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by the WDMH or of goods imported into Canada by the WDMH.

2. Our Business

The WDMH was incorporated in 1944 under the laws of Ontario and commenced operations on December 28, 1948. The WDMH is a community-based organization providing acute and chronic care services for the residents of its service area. The Hospital is a registered charity.

The WDMH serves a broad community, primarily comprised of Dundas, Stormont, and South Ottawa areas. We share a strong history and commitment to our community, and recognize that much of our growth in our Ambulatory Care, Obstetrics, Surgeries, and Specialty clinics (i.e. urology, sleep lab, etc.) has been made possible because of the support we have received from our community.

Our key services include a 24/7 emergency department, inpatient medical and surgical services, and obstetrics/newborn care. The hospital also provides a wide range of day surgery services and outpatient clinics, including cardiology, obstetrics, gynecology, ophthalmology, minor procedures, and urology, among others. Supporting our clinical services are laboratories, diagnostic imaging, and pharmacy services. We are also a partner in several regional programs, including operating as a key site for cancer care (chemotherapy and the Ontario Breast Screening Program), chronic kidney disease (dialysis), and other specialty clinics. Underlying all of our services is a strong base of physicians, particularly family physicians, staff, and volunteers.

The communities that we serve can be broadly categorized in two groups:

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- The WDMH's long-time local community as defined by the Stormont Dundas areas. These communities have changed over the years and are now largely made up of an aging population with seniors (individuals 65 years of age and older) making up an increasingly larger proportion of the overall population.
- A younger and growing population based in the South Ottawa area. For the last several years, as a result of our growing reputation, the quality of our services, and the fact that WDMH is only a short distance from Ottawa (less than 1 hour drive), we have seen a growth in the number of people that we serve who comes from the South Ottawa area. In contrast to those who live in the Stormont Dundas area, the South Ottawa area is growing and is made up of a younger population, many of whom are raising young families.

The WDMH maintains a contractual relationship with two national purchasing groups, HealthPRO Procurement Services Inc. ("**HealthPRO**") and Mohawk Medbuy ("**Mohawk**"), which together represent more than 1,300 healthcare facilities across Canada, for the purchase of approximately 95% of our supplies. Goods supplied via HealthPRO and Mohawk included all our medical supplies and equipment, from capital items such as CT Scanners and large medical equipment, beds, patient transport devices, through to consumable items such as sutures, dressings, nursing supplies, and personal protective equipment, as well as pharmaceuticals and prostheses. The approximately remaining 5% of our supplies are purchased directly by the WDMH and are under review with the goal of reaching 100% purchasing through Healthcare buying groups. The goods and services purchased by WDMH directly include maintenance, building and equipment services as well as other similar goods and services and are procured exclusively from Canadian vendors.

Further information about the WDMH can be found on our website at: www.wdmh.on.ca.

3. Policies

Through our organizational and governance policies we communicate our values and expectations, setting a high bar for ourselves, our suppliers, and our selling partners. We are committed to consistently evolving and improving our approach. We do not tolerate child, forced or bonded labour in any of our operations or by suppliers working for us. Our relevant policies are discussed in further detail below:

Commitment Statement

The WDMH's commitment statement states that all members of WDMH are here to care for patients with compassion and pursue excellence in all that we do. The commitment statement emphasizes the values of respect, accountability, innovation, and learning. The WDMH's commitment statement is our anchor for all our work.

Strategic Plan (2019-2025)

The WDMH's strategic plan for 2019-2025 emphasizes our four goals: quality and services, our people, partnership and integration and accountability. As part of its plan, WDMH aims to demonstrate accountability in all relationships and ensure responsible stewardship of all resources. In particular, WDMH sets out in its plan to make decisions ethically, consistently,

transparently and practise environmental responsibility. Lastly, as part of its plan, WDMH expects its members to strengthen health, safety, and wellness in the workplace.

Celebrating Diversity

The WDMH recognizes that our diversity is among our greatest strengths. We are committed to continual growth and improvement in ensuring that our hospital remains a safe space for all members of our community. We will continue to listen, learn, and review our policies and procedures to ensure that WDMH remains truly inclusive in its provision of excellence in healthcare.

Supplier Code of Conduct

The WDMH's Supplier Code of Conduct ("**Supplier Code**") applies to all our direct suppliers, including HealthPRO and Mohawk. The Supplier Code prohibits suppliers from using any forced or child labour and requires them to respect various other labour rights. The Supplier Code further requires our suppliers to take commercially reasonable measures, including risk management and due diligence, to ensure that these standards are respected by their own suppliers and down the supply chain. Suppliers are also required to implement grievance mechanisms. WDMH has information and audit rights, as detailed further below.

Due Diligence

We expect third parties with which we work, including HealthPRO and Mohawk, to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. We acknowledge that those working in our supply chains may be at potential risk of forced labour.

Under the Supplier Code, the WDMH may audit or investigate its suppliers' compliance with the Supplier Code, including by requiring suppliers to complete self-evaluations, requesting relevant documentation, carrying out visits or inspections of supplier facilities on either a scheduled or unannounced basis, or engaging third-party auditors or investigators.

- Providing Suppliers with a reasonable opportunity to correct the violation
- Enhanced monitoring, supervision, or other corrective measures
- Suspension or termination, in whole or in part, of the supplier's agreement with the WDMH
- Removal of the Supplier from the WDMH's approved vendor list on a permanent or temporary basis

4. Assessing Our Risk

The WDMH is aware that these potential risks are primarily related to the types of products we import, the commodities used in our supply chains, and our suppliers. We do not control our suppliers and despite our efforts to take increased actions to ensure our supply chain is free of any forced or child labour, there nonetheless remains a risk of forced or child labour on products we source from third parties where we may not have visibility into their supply chain.

The WDMH considers that the risk of forced labour and child labour among its direct suppliers is low. As noted above, only about 5% of purchases are made by the WDMH directly and these are all made through Canadian suppliers. The WDMH is in the process of beginning to evaluate effective strategies to better

identify the risks of forced and child labour in its supply chain. Although we have not identified any forced labour or child labour in our activities and supply chains, we remain dedicated to continuous monitoring and caution.

5. Our Commitments

The WDMH is committed to implementing strategies and processes to better identify and prevent the risks of forced and child labour within its operations and supply chains.

Steps to Prevent and Reduce Risks of Forced and Child Labour

- Adopting a Supplier Code of Conduct;
- Setting a goal of ethical behaviour for all our members; and
- Expecting that all WDMH members strive for accountability.

Remediation Measures

No instances of forced or child labour in our operations or supply chains were identified during the reporting period and we therefore did not take any measures to remediate any forced and child labour or the loss of income to the most vulnerable families arising from such measures.

Training

All of the WDMH personnel are required to complete a mandatory training based on their particular roles. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge to perform their duties.

The WDMH procurement services personnel have attended various training sessions, including training relating to forced labour and child labour. The WDMH procurement services personnel are currently enrolled in additional Ontario Broader Public Sector training to ensure that they remain up-to-date with developments in supply chain management, which includes forced labour and child labour.

6. Our Progress and Effectiveness

As we strive to be more accountable to our patients and communities, we must disclose how we are performing, where we are improving and where we need to improve. Disclosure of our progress is important to build trust with our stakeholders and to show that we are dedicated to respecting our engagements.

As part of our governance processes, we review any concerns raised through our informal mechanisms. To date, no significant concerns, or complaints regarding forced and child labour in our business and supply chains have been identified.

While we have yet to establish formal policies and procedures for evaluating the effectiveness of the varied measures implemented to mitigate the risk of forced and child labour within our operations and supply chains, we are committed to taking the necessary steps to assess their effectiveness.

7. Approval & Signature

This Report was approved by Winchester District Memorial Hospital’s Board of Directors pursuant to section 11(4)(a) of the Act on May 14, 2025 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our website at www.wdmh.on.ca.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for Winchester District Memorial Hospital. Based on my knowledge, and having exercised reasonable diligence, I 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.

Name: Cholly Boland

Title: CEO

Date: May 28, 2025

I have the authority to bind **Winchester District Memorial Hospital**.



