



HHSC Annual Report for the Bill S-211: *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Financial period:
FY 2025-26 (April 1, 2025, to March 31, 2026)

Hamilton Health Sciences Corporation

April 28, 2026



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 Hamilton Health Sciences, (the “Board”)
FROM: Tracey MacArthur
President & Chief Executive Officer
Hamilton Health Sciences
Date: April 30, 2026
REPORTING PERIOD: April 1, 2025, to March 31, 2026

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of President and Chief Executive Officer, attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.

Tracey MacArthur
President and Chief Executive Officer
Hamilton Health Sciences
April 30, 2026

Tracey MacArthur

Tracey MacArthur (Apr 28, 2026 12:16:41 EDT)

I have the authority to bind Hamilton Health Sciences

I certify that this attestation has been approved by the Board of Hamilton Health Sciences on April 28, 2026.

Signed by:

A handwritten signature in black ink, appearing to read 'R. Galaski', enclosed in a blue rounded rectangular box.

EDDD5CE2A8E443D...
Robert Galaski
Board Chair
Hamilton Health Sciences



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Executive Summary

Hamilton Health Sciences (HHS) is a community of 18,000 staff, physicians, researchers and volunteers that proudly serves southwestern Ontario residents. We also provide specialized, advanced care to people from across the province.

HHS is the only hospital in Ontario that cares for all ages, from pre-birth to end-of-life. We offer world-leading expertise in many areas, including cardiac and stroke care, cancer care, palliative care and pediatrics.

We are a world-renowned hospital for healthcare research. We focus daily on improving the quality of care for our patients through innovation and evidence-based practices.

As the largest employer in the Greater Hamilton region, we play a vital role in training the next generation of health professionals in collaboration with our academic partners, including McMaster University and Mohawk College. As such, HHS is committed to operating with integrity and high ethical standards, including respecting human rights.

In support of the passage of Bill S-211 *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, (the “Act”), HHS stands committed to complying and enforcing the Act at every level of its supply chain.

HHS understands that continuous and iterative processes within the organization are necessary to comply with the Act due to the complexity and dynamic nature of the fight against child labor and forced labor in supply chains. HHS is committed to continuously looking for ways to improve supplier chain transparency and will work to create suitable operational improvements and staff training initiatives.

HHS’s annual report will be available to the public online for viewing and download at:

- The HHS website: <https://www.hamiltonhealthsciences.ca/about-us/our-performance/financial-accountability/>
- In an electronic registry on Public Safety Canada’s website



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

Hamilton Health Sciences (“HHS”) is committed to preventing and reducing the risk of forced labour and child labour and has taken the following measures during the reporting period.

In the past financial year, Hamilton Health Sciences (“HHS”) continues to proactively address the critical issue of forced labor and child labor within its operations and supply chains, both domestically in Canada and internationally. Our organization regularly conducts an internal assessment of our vendor base to identify potential risks of forced labor and child labor across its activities and supply chains.

One key initiative implemented by HHS was the requirement for all vendors to have robust policies and procedures in place explicitly prohibiting the use of forced labour and child labour within their activities and supply chains. To ensure our vendor community is aligned with and supports HHS’ efforts and commitment to combating forced and child labour, all contracted and/or prospective vendors are required to provide attestation to Bill S-211 compliance. By mandating these policies, HHS not only reinforces its commitment to ethical business practices but also sets clear expectations for its vendor partners regarding labour standards.

To support this work and enforce compliance with ethical labor practices, HHS has added child labour and forced labour protection into our procurement policies and processes and vendor contract language. These measures aim to further safeguard against the exploitation of children within our operations and supply chains.

In addition to internal efforts, HHS continues to actively engage with its supply chain partners and peer hospitals on the issue of forced labor and child labor. Through collaborative initiatives and ongoing dialogue, HHS seeks to foster a collective commitment to address these challenges across the entire supply chain. By working together with vendors and peers, HHS aims to implement sustainable solutions that promote ethical labor practices and protect human rights.

HHS’ multifaceted approach demonstrates its dedication to combating forced labor and child labor within its operations and supply chains. By conducting internal assessments, implementing stringent policies, developing training materials, and engaging with stakeholders, vendors, and peers, HHS is taking proactive steps to mitigate risks and uphold ethical standards. As HHS continues to progress in its efforts, it remains steadfast in its commitment to promoting fair and responsible labour practices globally.



Appendix A HHSC Questionnaire Response

The following information uses the Ministry’s online questionnaire as the template for the report.

Bill S-211 reporting Questionnaire is located here:

<https://www.publicsafety.gc.ca/cnt/cntrng-crm/frcd-lbr-cndn-spply-chns/sbmt-rprt-en.aspx#a1>

Part 1 – Submission Information

Question	HHS Response
*This report is for:	An entity
*State the legal name of the reporting entity or government institution:	HAMILTON HEALTH SCIENCES CORPORATION
*Reporting year:	May 31, 2026
*Financial year covered by report (Start Date):	April 1, 2025
*Financial year covered by report (End Date):	March 31, 2026
*Is this a revised version of a report that was already submitted this reporting year?	No
Business number(s) (if applicable, provide the business number of the entity completing this questionnaire):	867435497
Is this a joint report?	No
*Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?	No
*Which of the following categories apply to the entity? Select all that apply.	<p>Canadian business presence (select all that apply):</p> <ul style="list-style-type: none"> • Has a place of business in Canada • Does business in Canada • Has assets in Canada <p>Meets size-related thresholds (select all that apply):</p> <ul style="list-style-type: none"> • Has at least \$20 million in assets for at least one of its two most recent financial years • Has generated at least \$40 million in revenue for at least one of its two most recent financial years • Employs an average of at least 250 employees for at least one of its two most recent financial years.
*In which of the following sectors or	<ul style="list-style-type: none"> • Health care and social assistance



industries does the entity operate? Select all that apply.	<ul style="list-style-type: none"> Hospitals
*In which country is the entity headquartered or principally located?	Canada
*In which province or territory is the entity is headquartered or principally located?	Ontario

*Mandatory Question

Part 2 – Reporting for Entities

Question	HHS Response
*Which of the following accurately describes the entity's structure?	Corporation
*Which of the following accurately describes the entity's activities? Select all that apply.	Importing goods into Canada
*What steps has the entity taken in its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply.	<ul style="list-style-type: none"> Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily Requiring suppliers to have policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains Monitoring suppliers Developing and implementing grievance mechanisms to address complaints in the workplace Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
Please describing the steps the entity has taken to prevent or reduce risks of forced labour or child labour in its supply chains (if applicable) (3,000 character limit).	<p>HHS continues to ensure there is alignment between HHS and our contracted vendors related to important social and economic issues, including Bill S-211, referred to as Values-Based Procurement standards.</p> <p>During contract onboarding, all vendors are required to submit their attestation confirming they have policies, procedures, and governance structure to support each element of our Values-Bases Procurement model.</p> <p>Vendors are required to attest to the following:</p> <ul style="list-style-type: none"> In compliance with Bill S-211, the proponent attests that their organization has policies, processes, and governance structure designed to reduce and prevent the risk that



	<p>forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.</p> <ul style="list-style-type: none"> • Further, the Goods and any services provided by the Vendor under existing Agreements are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada's <i>Fighting Against Forced Labour and Child Labour in Supply Chains Act</i>). <p>Responses are logged, tracked, and managed in the HHS contract management system.</p> <p>HHS continues to work closely with our Group Purchasing Organization (GPO) Mohawk Medbuy Corporation on strategies to address, combat, and report on forced and child labour within our supply chains.</p>
<p>*Does the entity currently have policies and/or due diligence processes in place related to forced labour and/or child labour?</p>	<p>Yes</p>
<p>*If yes, which elements of the policies and/or due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply.</p>	<ul style="list-style-type: none"> • Embedding responsible business conduct into policies and management systems • Identifying and assessing potential and actual adverse impacts in operations, supply chains and business relationships • Providing for or cooperating in remediation where appropriate
<p>*Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?</p>	<p>Yes, we have started the process of identifying parts of our activities and/or supply chains that carry risks, but there are still gaps in our assessments.</p>
<p>*If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.</p>	<p>None of the above</p>
<p>*Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries?</p>	<p>None of the above</p>



Select all that apply.	
Please provide details on the parts of the entity's activities and supply chains where the entity has identified a risk of forced labour or child labour and describe the actions taken to assess and manage those risks (if applicable) (3,000 character limit)	We have started the process of identifying parts of our activities and/or supply chains that carry risks, but there are still gaps in our assessments. We have begun this work by establishing and collecting vendor attestations to compliance with Bill S-211. Further work is required.
*Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?	Not applicable, we have not identified any forced labour or child labour in our activities or supply chains.
*Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains?	Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities or supply chains.
*Does the entity currently provide training to employees on forced labour and/or child labour?	Yes
*If yes, is the training mandatory?	Yes, the training is mandatory for employees making contracting or purchasing decisions
*Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?	Yes
*If yes, what method does the entity use to assess its effectiveness? Select all that apply.	Setting up a regular review or audit of the entity's policies and procedures related to forced labour and child labour.

**Mandatory Question*



Appendix B:
Mohawk Medbuy Corporation (MMC) Member Letter to Bill S-211 FY2025-26



March 2, 2026

Reporting for the "Fighting Against Forced Labour and Child Labour in Supply Chains Act"

Dear Member,

We provide this letter in connection with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the financial year April 1, 2025, to March 31, 2026 (the "Reporting Period").

In providing this letter, we have exercised care and diligence that would reasonably be expected of a Chief Operating Officer and a Chief Marketing Officer and Senior Vice President - Strategy, in these circumstances.

The following steps have been undertaken by Mohawk Medbuy Corporation (MMC) during the Reporting Period to prevent and reduce the risk of forced labour or child labour being used within our supply chain, which may be included for completeness in legislative reporting by the hospital for compliance with the Act. This information will form part of MMC's report once approved by the MMC Board of Directors.

Structure, Activities and Supply Chains

Mohawk Medbuy is a national, not-for-profit, shared services organization that supports hundreds of health care providers across Canada, as well as child welfare agencies and other public sector organizations. MMC provides value-driven contracting and procurement solutions for medical/surgical supplies, pharmaceutical products, local sourcing, capital (equipment, furniture, fixtures), redevelopment services, and nutrition solutions. Other services include data analytics, in-hospital support, warehousing and logistics, technology, procure-to-pay and accounts payable. The warehousing services are delivered through wholly owned subsidiary, Hospital Logistics Inc., that services hospitals in southern Ontario.

Mohawk Medbuy sources over 300,000 items utilized by health care providers and other public sector organizations. Most suppliers of these products are large multinational corporations with a Canadian presence that may produce or source globally.

Policies and Due Diligence Processes

Contractual Framework

Mohawk Medbuy includes standard contract language within the Representations and Warranties section of our Supplier Agreements that prohibits the use of forced and/or child labour:

"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)."



Competitive procurement templates (e.g., RFPs) include language requiring suppliers bidding for hospital business to attest that they do not use forced labour or child labour.

"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)."

Supplier Due Diligence During the Sourcing Process

Many of the suppliers that respond to Mohawk Medbuy procurements have a long history of working with our organization. When new suppliers respond, Mohawk Medbuy thoroughly reviews their responses to the attestation and Agreement redlining to ensure that they're compliant with the Act. If Mohawk Medbuy is advised of any suspicious activity on this front, it is thoroughly investigated. If a supplier is found to not be adhering to the law, they will be eliminated from the procurement and any future procurements until such time that they can demonstrate compliance.

Supplier Engagement

MMC engages suppliers through annual business reviews and ad hoc communications to share our Environmental, Social and Governance (ESG) supply chain risk management efforts, including ESG risk assessments, and their compliance activities under the Act.

Formal Grievance Mechanism

Mohawk Medbuy is committed to supporting the highest standard of ethics in our business practices. Employees, contractors and suppliers must report any suspected irregularity as early as possible. MMC's third-party Whistle Blower Reporting Line operates 24 hours a day, seven days a week, 365 days a year. It is provided by a confidential and anonymous external service to which employees and other third parties (e.g., contractors and suppliers) may make a good faith report about suspected irregularities. The Whistle Blower Reporting Line can be accessed by MMC through our website.

Supplier ESG Risk Management

Mohawk Medbuy conducted a **Supplier ESG Risk Assessment** for the Reporting Period, which included 34 suppliers (representing approximately 70% of MMC's total contracted spend). As part of the Assessment, we reviewed supplier disclosures on unethical labour practices, environmental violations, overall regulatory compliance, as well as supply chain risk management practices and associated documentation. From the suppliers in our sampling, there were no reported violations under the Act (in accordance with their Modern Slavery report submission to Public Safety Canada). MMC intends to expand our Supplier ESG Assessment next fiscal to cover 90% of contract spend.

Supplier Standards

A "MMC Supplier Standards" document (Supplier Code of Conduct) has been developed to further reinforce the expectations and obligations of suppliers in meeting ethical, social, environmental and governance requirements, including the elimination of forced labour and child labour.

MMC's Supplier Standards are planned for implementation in 2026 and are currently undergoing legal review prior to rollout. The implementation will follow a phased approach, beginning with MMC's top suppliers.



Supplier ESG Maturity Assessment

Delivered in the form of a supplier survey, a Supplier ESG Maturity Assessment will be implemented in the next financial year. It will be rolled out to top suppliers to gain a clearer understanding of their overall ESG performance, including supply chain risk management, and to show potential areas for advancement.

Forced Labour and Child Labour Risks

Mohawk Medbuy recognizes there are inherent risks within the health care sector. Industry-related risks arise from the complexity and diversity of materials and services needed in health care operations. Geography-specific risks may arise from the variations in labour laws, enforcement and governance across global regions.

MMC's risk exposure is directly linked to that of our contracted suppliers, and we have implemented a multi-pronged approach to mitigate such risks. These include a comprehensive Supplier ESG Risk Assessment, contractual and RFX requirements strictly forbidding child labour and forced labour in our supply chain. MMC is developing a Supplier Code of Conduct, which will be implemented in 2026 to reinforce our expectation of suppliers to conduct business ethically, transparently and with the highest levels of integrity.

MMC will continue to strengthen our governance measures to more effectively track and assess how contracted suppliers are addressing forced labour and child labour risks within their operations, as well as the mitigation mechanisms they've implemented to manage those risks.

Remediation

Mohawk Medbuy has not been made aware of any instances where forced labour or child labour exists in current supply chains, and therefore has not taken:

- Any measures to remediate forced labour or child labour.
- Any measures to remediate the loss of income to the most vulnerable families that results from forced labour or child labour.

Training

Mohawk Medbuy has developed ESG training that has been completed by all MMC employees, and forms part of the mandatory onboarding training for new employees. The training includes a module addressing the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and provides guidance on relevant contract language, emphasizing that such language must not be removed during contract negotiations.

Mohawk Medbuy has also developed ESG training for Members, which includes content addressing the Act, and can be used by Members for employee training and compliance purposes.

More training will be developed in the next financial year to enhance the current training modules and provide further education to our Strategic Sourcing teams on supplier risk management best practices. These training resources will be available to our Members to use and support their efforts in meeting the requirements of the Act.




Assessing Effectiveness

Mohawk Medbuy is committed to supporting strong governance and driving continuous improvement across our supply chain. We recognize the importance of assessing the effectiveness of our actions to address forced labour and child labour. To that end, our evaluation process includes:

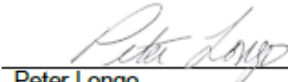
- Monitoring supplier performance through an annual Supplier ESG Risk Assessment.
- Enhancing current measures by implementing a Supplier ESG Maturity Assessment in 2026 to support the ongoing evaluation of supplier progress.

Sincerely,

MOHAWK MEDBUY



Janice Mundell
Chief Marketing Officer and
Senior Vice President,
Strategy



Peter Longo
Chief Operating Officer



Appendix C:

Fighting Against Forced Labour and Child Labour in Supply Chains Act Frequently Asked Questions (FAQ)

Fighting Against Forced Labour and Child Labour in Supply Chains Act Frequently Asked Questions

- **What is the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*?**

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“the Act”) is a federal statute (formerly “Bill S-211”) and came into force on January 1, 2024. The Act imposes annual reporting obligations on many Canadian entities in an attempt to minimize the risk of forced labour and child labour in supply chains.

The Act does not require entities to meet a prescribed level of due diligence with respect to forced and child labour. The obligation is limited to reporting and transparency and is intended to indirectly encourage organizations to improve their efforts around forced and child labour.

- **Who does the Act apply to?**

The Act applies to government institutions and “entities” that:

- (a) produce, sell or distribute goods in Canada or elsewhere;
- (b) import goods into Canada that are produced outside of Canada; or
- (c) control another entity engaged in the activities described in (a) and (b).

The term “entity” is broadly defined in the Act to include a corporation or trust, partnership or other unincorporated organization that:

- (a) is listed on a stock exchange in Canada; or
- (b) has a place of business in Canada, does business in Canada or has assets in Canada and based on its consolidated financial statements, meets at least two of the following conditions for at least one of its two most recent financial years:
 - (i) it has at least \$20 million in assets;
 - (ii) it has generated at least \$40 million in revenue; and
 - (iii) it employs an average of at least 250 employees.

Additionally, an entity can mean a business prescribed by regulations, however, at this time, there are no regulations to this effect. Given the broad definition of “entity”, the Act applies across a broad range of industries including some in the hospital sector.¹

- **What is required under the Act?**

Every entity that meets the criteria set out above must submit an annual report, on or before May 31 of each year, to the Minister of Public Safety and Emergency Preparedness.

The report must indicate what steps the entity took during the previous financial year to

¹ For further information, please visit the Ontario Hospital Association’s Guidance Document: [Fighting Against Forced Labour \(Bill S-211\) - March 2024.pdf \(oha.com\)](#)

² To view the complete Act, please visit: <https://www.parl.ca/DocumentViewer/en/44-1/bill/S-211/third-reading>.



prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods made by the entity or imported into Canada by the entity.

The annual report must be approved by the governing body of the entity and include a signed attestation from one or more members of the entity's governing body. The report must be made available on the entity's website.

▪ **What are the corporate liabilities and potential penalties under the Act?**

The Act provides for penalties of up to \$250,000 and a summary conviction for non-compliance with requirements under the Act, including for:

- Failing to submit a report on or before May 31 of each year;
- Failing to properly publish a report on the entity's website;
- Failing to include information in the report as prescribed by the Act, including requirements on the attestation of the report and form and content of the report; and,
- Making a "false or misleading statement" in a report or in the course of an investigation to verify compliance.

▪ **Are there director liabilities and potential penalties under the Act?**

The Act provides for liability of directors and officers of the entity in instances where those individuals "*directed, authorized, assented to, acquiesced, or participated in the commission of an offence under the Act*", even if the entity itself was not prosecuted or convicted. Similarly, the Act provides for penalties for directors and officers of up to \$250,000 and a summary conviction.