



**ST. BONIFACE HOSPITAL ANNUAL REPORT FOR APRIL 1, 2025 – MARCH 31, 2026  
FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT**

## **Introduction**

This is St. Boniface General Hospital Inc's. ("St. Boniface Hospital") third annual report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act").

St. Boniface Hospital Inc. ("St. Boniface Hospital") operates Manitoba's second-largest hospital in the St. Boniface neighborhood of Winnipeg. It maintains a campus comprised of more than 180 departments and services, located in seven separate buildings on approximately 20 acres of land.

## **Structure**

St. Boniface Hospital is a Catholic health care facility established by the Sisters of Charity of Montreal "Grey Nuns". Historically, it was a statutory corporation incorporated under a private act of the Manitoba Legislative Assembly, most recently continued under *The St. Boniface General Hospital Incorporation Act*. However, in 2000 it was continued under *The Corporations Act* through articles of continuance filed under that statute.

St. Boniface Hospital is one of 13 health, social and human service agencies under the umbrella of the Réseau Compassion Network. Its mandate is to operate as the leading tertiary care hospital in Manitoba, providing a range of tertiary, secondary, and primary care and patient services. St. Boniface Hospital operates under a service purchase agreement with the Winnipeg Regional Health Authority (the "WRHA") wherein the WRHA provides funding to St. Boniface Hospital for the provision of certain health services. St. Boniface Hospital is dedicated to coordinating and providing a wide range of clinical services, including but not limited to the Cardiac Sciences Program, Family Medicine, Emergency Department, Palliative Care, Rehabilitation & Geriatrics, Medicine, Surgery, Mental Health, Renal Health, Allied Health, and Obstetrics, Gynecology & Neonatology.

Beyond its core patient care functions, St. Boniface Hospital operates an art gallery, a gift shop, and actively engages in biomedical research through the St. Boniface Hospital Research Centre. The St. Boniface Hospital Research Centre provides valuable practicum opportunities for university students, facilitated by its affiliation with the University of Manitoba. The hospital's research efforts primarily focus on cardiovascular studies, magnetic resonance imaging (MRI) and spectroscopy, and degenerative disorders associated with aging.



## **Activities to Which the Act Applies**

St. Boniface Hospital is not in the primary business of producing, importing, or distributing goods. However, some of those activities are ancillary to the hospital's operation and the Act applies to those activities.

1. Food services:
  - (a) St. Boniface Hospital operates an on-site meal service wherein its staff prepares the meals and then distributes them to patients.
2. Pharmacy compounding of medications:
  - (a) St. Boniface Hospital's Pharmacy Program staff compounds medications exclusively for patient care within the hospital, which are not intended for sale. St. Boniface Hospital provides the compounded medications to patients while providing patient care. In exceptional circumstances, compounded medications may be distributed to other sites under a compounding agreement.
3. Gift Shop:
  - (a) St. Boniface Hospital operates a gift shop that offers a variety of products to the public. While the majority of goods are locally sourced or sourced nationally, a small portion of the inventory is imported from the United States.

## **Supply Chain Underlying St. Boniface Hospital Activities**

Procurement for Manitoba's hospitals is centralized at the provincial level. Shared Health is designated as the provincial health authority pursuant to *The Health System Governance and Accountability Act* (Manitoba) and is responsible to provide certain shared administrative services to health corporations such as St. Boniface Hospital.

Supply Chain Management Shared Services ("SCMSS") and Provincial HR Shared Services ("PHRSS") are examples of a shared administrative service under Shared Health.

Shared Health and WRHA are active members of HealthPRO, which is a national group purchasing organization. Through WRHA's membership, St. Boniface Hospital receives

the benefit of HealthPRO competitive bid processes and managed contracts. Approximately 95% of the WRHA's pharmacy contracts are committed through HealthPRO agreements.

CancerCare Manitoba ("CCMB") is designated as the cancer authority pursuant to The Health System Governance and Accountability Act (Manitoba) and cooperates with others, including St. Boniface Hospital, for the delivery of cancer-related health services.

SCMSS' responsibility for St. Boniface Hospital's activities are as follows:

1. St. Boniface Hospital relies on SCMSS to procure goods to support its clinical programs. SCMSS on behalf of St. Boniface Hospital purchases goods produced outside Canada from third party suppliers, where that third party is considered to be the importer for the purposes of the Customs Act, but St. Boniface Hospital understands such is not considered importing under the Act.

However, SCMSS on behalf of St. Boniface Hospital on as needed basis imports goods from distributors, with the assistance of a customs broker as needed, if the existing suppliers managed by SCMSS cannot provide the goods. This importing mostly applies to medical supplies and generally such is imported from the United States.

2. St. Boniface Hospital's onsite meal service relies on the food and supplies vendors to provide the necessary groceries for meal preparation and distribution to patients. While the meals are prepared by St. Boniface Hospital staff, SCMSS oversees competitive bid processes and contracts with suppliers to ensure the supply and delivery of raw materials to St. Boniface Hospital.

St. Boniface Hospital food services also participate in HealthPRO contracts for oral nutrition supplements, enteral formula, and thickened fluids. A description of the direct and indirect suppliers that contribute goods/services to the goods produced and distributed through St. Boniface Hospital's onsite meal service and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.

3. SCMSS infrequently is responsible to lead the competitive bid processes and/or contracting with suppliers for the raw materials used by St. Boniface Hospital's Pharmacy Program to compound medications. For a majority of its Pharmacy Program needs, St. Boniface Hospital, through the WRHA, relies on HealthPRO to issue competitive bid processes for these raw materials and thereafter WRHA

together with other health care organizations enter a contract with the selected suppliers that are managed by HealthPRO. As described above, approximately 95% of the WRHA's pharmacy contracts are committed through HealthPRO. Furthermore, CCMB acquires cancer medications from suppliers and as required provides such to the St. Boniface Hospital's Pharmacy Program for compounding. A description of the direct and indirect suppliers that contribute goods/services to the goods produced through the WRHA Pharmacy Program that are distributed accordingly by St. Boniface Hospital's Pharmacy Program and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.

4. SCMSS is not responsible to lead the competitive bid processes and/or contracting with suppliers for the goods sold in St. Boniface Hospital's gift shop. St. Boniface Hospital gift shop partner with vendors from both local and national sources, with a minority of goods being imported from the United States. This importing mostly applies to giftware. A description of the direct and indirect suppliers that contribute goods/services to the goods imported by St. Boniface Hospital and a more detailed description of the source countries/regions of those goods/services, was not able to be ascertained for this annual report.

#### **Steps Followed to Prevent Forced or Child Labour:**

In light of this centralized procurement structure, any measures related to forced labour or child labour were undertaken at the provincial level through SCMSS. These steps were applied broadly across provincial supply chains and, as such, were not specific to the supply chains that contribute directly to St. Boniface Hospital's activities. Generally, these steps include:

1. Developing and implementing anti-forced labour and/or child labour standards and/or compliance checklists;
2. Developing and implementing procedures to track effectiveness in addressing forced labour and/or child labour; and
3. Engaging with supply chain partners on the issue of addressing forced labour and/or child labour.

These steps were not undertaken for goods imported into Canada by St. Boniface Hospital Gift Shop.

### Developing and implementing anti-forced labour and/or child labour standards and/or compliance checklists

SCMSS developed a scored question for its competitive bid processes that require proponents that meet the Act's definition of "Entity" to provide their public facing commitment to eliminate forced labour and child labour and steps they have taken to ensure its supply chain is free from forced labour and child labour. This scored question was implemented by SCMSS broadly for its competitive bid processes for goods and some services.

### Developing and implementing procedures to track effectiveness in addressing forced labour and/or child labour

SCMSS developed and implemented a procedure to undertake an annual sampling of ten (10) competitive bid processes to confirm the scored question described above was implemented.

In the past financial year, SCMSS was in the process of setting up a performance management team to ensure suppliers maintain contractual compliance and key performance indicators. The performance management team may be assigned the annual sampling in the future.

### Engaging with supply chain partners on the issue of addressing forced labour and/or child labour.

SCMSS requested HealthPRO confirm what steps it had taken during the previous financial year to address forced labour and child labour in their competitive bid processes and contracts. On May 6, 2025, HealthPRO advised that:

1. For Pharmacy contracts, the competitive procurements included a scored question as to the proponents' commitment to all steps to fight against forced labour and child labour in supply chains, and asked proponents to provide information on relevant policies, programs, third party audits, monitoring effort and measurable indicators, and disclosure of any legal actions, sanctions or fines that the proponent has had imposed.
2. Their Nutrition and Food Services partner Complete Purchasing Services also strictly requires that its suppliers comply with all applicable laws, and, in addition, have multiple policies and processes to set expectations for suppliers regarding human rights and labour rights (including child labour and forced labour).

## **Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour**

St. Boniface Hospital currently does not have any policies or due diligence processes (as described in the *OECD Due Diligence Guidance for Responsible Business Conduct*) in place related to forced labour or child labour. In large part, this is because the procurement of goods is centralized at the provincial level, as described above. The provision of health services is highly regulated in Manitoba, which means that St. Boniface Hospital would have limited autonomy to establish its own procurement policies.

As described above, SCMSS acting on behalf St. Boniface Hospital developed a scored question for its competitive bid processes that require proponents that meet the Act's definition of "Entity" to provide their public facing commitment to eliminate forced labour and child labour and steps they have taken to ensure its supply chain is free from forced labour and child labour. This scored question was implemented by SCMSS broadly for its competitive bid processes for goods and some services. For tracking purposes, SCMSS developed and implemented a procedure to undertake an annual sampling of ten (10) competitive bid processes to confirm the scored question was implemented

St. Boniface Hospital, through PHRSS, has hiring procedures that are designed to maintain compliance with federal immigration legislation and provincial employment legislation which addresses one form of child labour as defined in the Act i.e., *labour or services provided or offered to be provided by persons under the age of 18 years and that are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada.*

PHRSS is responsible for managing human resource functions and services for healthcare organizations within the Shared Health and the WRHA, which includes St. Boniface Hospital. This includes activities such as recruitment, payroll, and benefits administration. St. Boniface Hospital's hiring procedures are designed to maintain compliance with federal immigration legislation that requires permanent residency, citizenship, or a permit to work in Canada or the pending application for the same, and provincial legislation where St. Boniface Hospital must register to employ any foreign worker other than a Manitoba Provincial Nominee.

All prospective employees of St. Boniface Hospital, including staff recruited for food services, pharmacy services, and the gift shop are recruited by advertising job opportunities on various career websites as well as the WRHA/Shared Health career website. Prospective employees are required to respond to the question "*Are you legally authorized to work in Canada?*" and the answer options are: "*a) authorized to work for*

*any employer, b) authorized to work for my present employer only, c) I require sponsorship to work in this country".* As part of the internal controls of St. Boniface Hospital, applicants are required to accept an acknowledgement that states:

I understand that I am applying for employment within a site or service represented on the Winnipeg Regional Health Authority (WRHA)/Shared Health careers website. All information I provide as part of the application process is true and correct and not misleading in any way. I understand that elements of my application may be checked, including references from prior employers, job history, education, and other qualifications and information provided by me. If it is found that I have misrepresented myself, my application may be disqualified; if I have been awarded a position, my employment may be terminated, regardless of how much time has elapsed. If I am offered employment, I will be required to supply satisfactory background checks as described in the written employment contract.

As a general practice St. Boniface Hospital does not employ people under the age of 18 years. However, St. Boniface Hospital cannot prohibit employing persons that are under the age of 18 years as that would be considered age discrimination. St. Boniface Hospital, through PHRSS, has hiring procedures that are designed to maintain compliance with *The Employment Standards Code* (Manitoba) which non-exhaustively requires:

1. To not employ a person under the age of 13 years.
2. To employ a person that is 13 years or older but less than 16 years old requires a Work Readiness Certificate and/or a Child Employment Permit. The Work Readiness Certificate would certify they completed the Young Worker Readiness Certificate Program which pertains to labour rights and safety and include a signed consent of their parent to the employment.
3. To not employ a person under the age of 16 years between 11:00pm and 6:00am or for more than 20 hours during a week of school.

As per Section 4.1 of [Shared Health Policy #320.100.136 \(Security Checks for Employment\)](#), all new hires are required to complete a criminal records check (including vulnerable sector search), adult abuse registry check, and child abuse registry check ("Security Checks"). In PHRSS's screening processes, the age of a worker (and the corresponding obligations/restrictions for employing same under The Employment Standards Code (Manitoba)) would be identified when reviewing the Security Checks. Section 4.4 of Shared Health Policy #320.100.136 (Security Checks for Employment), provides that if an applicant must commence employment before the Security Checks are obtained and

provided to Shared Health, the letter of offer to the applicant will contain a statement that the offer of employment is conditional on the return of satisfactory security check(s), as required, and the failure to return same on or before the date specified could result in the immediate termination of employment for cause.

### **Forced Labour and Child Labour Risks in St. Boniface Hospital's Supply Chain**

Because of the centralized supply chain for Manitoba's hospitals as described above, St. Boniface Hospital has not conducted a formal assessment of forced labour and child labour risks in its supply chain. However, the hospital has no reason to believe that there is a material risk of such labour being used in its supply chain.

### **Remediation Measures/Remediation of Loss of Income**

St. Boniface Hospital did not undertake any measures to remediate any forced labour or child labour in its activities and supply chains in the previous financial year, as it did not identify any instances of such labour in its supply chain.

For the same reason, St. Boniface Hospital has not taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.

### **Training on Forced Labour and Child Labour**

St. Boniface Hospital does not currently provide training to employees on forced labour and/or child labour.

**Policies and Procedures Assessing Effectiveness**

As described above, SCMSS acting on behalf of the St. Boniface Hospital developed a scored question for its competitive bid processes that require proponents that meet the Act’s definition of “Entity” to provide their public facing commitment to eliminate forced labour and child labour and steps they have taken to ensure its supply chain is free from forced labour and child labour. This scored question was implemented by SCMSS broadly for its competitive bid processes for goods and some services. As part of a procedure to assess its effectiveness in ensuring forced labour and child labour are not used in Shared Health’s supply chains, SCMSS developed and implemented a procedure to undertake an annual sampling of ten (10) competitive bid processes to confirm the scored question was implemented. In the past financial year.

St. Boniface Hospital has no policy or procedure in place at this time to assess its effectiveness in ensuring forced labour and child labour are or are not being used in its activities and supply chains.

*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.*

Name: Judy Murphy

Title: Board Chair

Date: April 8, 2026



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I have the authority to bind St. Boniface Hospital Inc.