



Four Counties Health Services site
 1824 Concession Drive
 Newbury ON N0L 1Z0
 519 693-4441

Strathroy Middlesex General Hospital site
 395 Carrie Street
 Strathroy ON N7G 3J4
 519 245-1550
 www.mhalliance.on.ca

Forced Labour in Canadian Supply Chains (Bill S-211) – Annual Report

1. Identifying Information	Entity Response
Reporting entity's legal name	Strathroy Middlesex General Hospital
Financial reporting year	April 1, 2025 – March 31, 2026
Business number(s), if applicable	10804 0841 RR0001
Entity categorization according to the Act	Corporation
Identification of a joint report, if applicable	N/A
Identification of reporting obligations in other jurisdictions	N/A

2. Entity Categorization According to the Act	Entity Response
Sector/industry	Healthcare/Public Hospital
Location	Strathroy, Ontario

3. Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour	Entity Response
Description of steps taken during the previous financial year	<p>SMGH uses a third party shared services organization, Healthcare Materials Management Services (HMMS) and they have attested to the following (see Appendix #1):</p> <p>HMMS has modified standard contract language (clause 20.4) and purchase order terms and conditions (section 11.9) to include the following in Supplier Terms Related to Purchased Products or Equipment:</p> <ul style="list-style-type: none"> 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). <p>HMMS has also modified our competitive procurement templates (e.g. RFP), to include the following language that suppliers/vendors bidding for Hospital business must attest to:</p> <ul style="list-style-type: none"> 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)

4. Supplementary Information Addressing Requirements in Subsection 11(3)	Entity Response
(a) Structure, Activities, & Supply Chains	
Legal structure	Corporation (Incorporated without share capital under the Corporations Act of Ontario & registered charitable organization within the meaning of the Income Tax Act)
Organizational structure	See Appendix #2
Organizational mandate or role	<p>Strathroy Middlesex General Hospital (SMGH) is a full service family-centred community hospital providing a comprehensive range of diagnostic and ambulatory services, as well as both primary and secondary care.</p> <p>The hospital operates 54 acute care beds along with a comprehensive range of diagnostic and outpatient services. Medical staffing includes a number of active local family physicians, internists, surgeons and specialists.</p>
Number of employees	Approx. 300
Partner organizations or membership in a group	Middlesex Hospital Alliance (MHA), an alliance between Strathroy Middlesex General Hospital (SMGH) & Four Counties Health Services (FCHS)
Control of other entities	N/A
Activities, the production and importation of goods	<p>SMGHs primary source of revenues is the Province of Ontario (Ministry of Health & Ontario Health) in support of patient care activities and hospital operations. Additional revenue sources include interprovincial patient revenues, patient-preferred accommodations, self-pay procedures, and miscellaneous sources. Direct sales activities, such as medical aids/devices and cafeteria food sales to patients and visitors, contribute less than 1% of total revenues. All SMGH operations are confined to Ontario, Canada.</p> <p>At SMGH, direct importation of goods is minimal. The majority of Purchase Orders (PO) are with Canadian vendors, in some cases those Canadian vendors will fulfill the PO through importation and deliver to SMGH. These imported goods primarily originate from the USA, Mexico, and Europe.</p>
Supply Chain, suppliers of goods and services	SMGH uses a third party shared services organization, Healthcare Materials Management Services (HMMS), for Sourcing, Contract Management, Purchasing, Accounts Payable, Logistics, Supply Chain Systems and Inventory Management. SMGH & HMMS access Group Purchasing Organizations (GPOs) in the healthcare sector for sourcing and contracts, specifically HealthPRO Procurement Services Inc. and Mohawk Medbuy Corporation. In the fiscal year SMGH created POs with approximately 300 vendors for both goods (medical supplies, office supplies, equipment, etc.) and services (construction, security, transportation, etc.).



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4. Supplementary Information Addressing Requirements in Subsection 11(3)	
(b) Policies and Due Diligence Processes	Entity Response
Description of policies and due diligence processes	<p>SMGH policies include a Code of Ethics for Supply Chain. The goal of this policy is to ensure an ethical, professional and accountable supply chain process, with a focus on:</p> <ol style="list-style-type: none"> 1. Personal Integrity & Professionalism - All MHA staff involved with purchasing or other supply chain-related activities must act, and be seen to act, with integrity and professionalism. Honesty, care and due diligence must be integral to all supply chain activities within and between the MHA, suppliers and other stakeholders. Respect must be demonstrated for each other and for the environment. Confidential information must be safeguarded. All participants must not engage in any activity that may create, or appear to create, a conflict of interest, such as accepting gifts or favours, providing preferential treatment, or publicly endorsing suppliers or products. 2. Accountability & Transparency - Supply chain activities must be open and accountable. In particular, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for public money. All participants must ensure that public sector resources are used in a responsible, efficient and effective manner. 3. Compliance & Continuous Improvement - All individuals involved in purchasing or other supply chain-related activities must comply with this Code of Ethics and the laws of Canada and Ontario. All individuals should continuously work to improve supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share leading practices.
(c) Forced Labour & Child Labour Risks	Entity Response
Identification of parts of activities and supply chains carrying a risk	<p>Based on the Federally identified supply chain areas of risk, the following are potential areas associated with SMGH supply chain activities:</p> <ul style="list-style-type: none"> - Linen & Textiles, used in patient care - Medical Devices & Equipment - Food & Nutrition Products for patients and sale through the cafeteria - Pharmaceuticals provided to inpatients - IT Equipment
Steps taken to assess and manage risks	<p>SMGH adheres to the Code of Ethics policy, beyond this policy and the work HMMS has completed no specific steps have been taken to manage the potential areas of risk. HMMS 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, HMMS will inform SMGH.</p>
(d) Remediation Measures	Entity Response
Description of remediation measures	No measures have been taken to remediate forced labour or child labour, if any, in SMGH activities and supply chains.
(e) Remediation of Loss of Income	Entity Response
Measures taken to remediate loss of income	No measures have been taken to remediate loss of income to those effected by forced labour or child labour in SMGH activities and supply chains.
(f) Training	Entity Response
Details of training provided	No training is specifically provided in relation to forced labour and child labour.
- Mandatory/optional	N/A
- Coverage	N/A
- Content and development	N/A
(g) Assessing Effectiveness	Entity Response
Actions taken to assess effectiveness	No actions have been taken to assess SMGHs effectiveness in preventing and reducing risks of forced labour and child labour in their activities and supply chains.

5. Attestation	
<p>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.</p>	
Signature	
Name/Title	Ron Sapsford, Board Chair I have the authority to bind Strathroy Middlesex General Hospital.
Date	April 30, 2026
Signature	
Name/Title	Julie McBrien, President & CEO I have the authority to bind Strathroy Middlesex General Hospital.
Date	April 30, 2026



Date:	March 11, 2026
Submitted By:	Toby O'Hara, General Manager, HMMS
Topic:	Reporting for the Fighting Against Forced Labour and Child Labour in Supply Chains Act

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

We provide this briefing note 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 briefing note, we have exercised care and diligence that would reasonably be expected of the General Manager of HMMS, overseeing the supply chain activities leveraged by our affiliate Hospital partners, in these circumstances.

The following steps have been undertaken at HMMS during the current fiscal year and may be included for completeness in legislative reporting undertaken by the Hospital for compliance with Bill S-211.

HMMS has standard contract language (clause 20.4) and purchase order terms and conditions (section 11.9) that include the following in Supplier Terms Related to Purchased Products or Equipment:

- 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).

HMMS has also modified our competitive procurement templates (e.g. RFP), to include the following language that suppliers/vendors bidding for Hospital business must attest to:

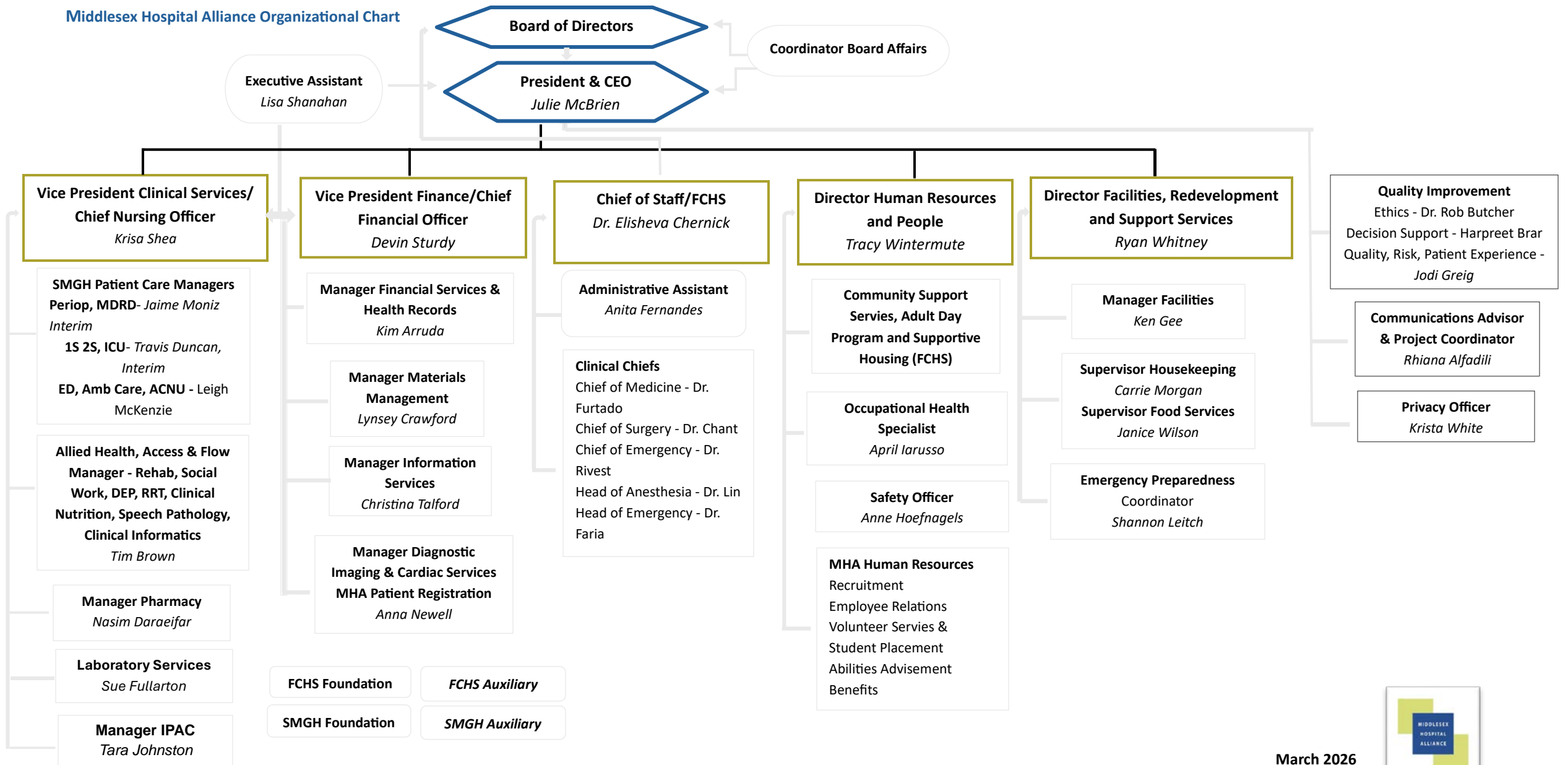
- Warrants that the goods and services that the Proponent is proposing to provide to the Purchaser are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act);

HMMS 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, HMMS will inform our Hospital partners.

A handwritten signature in black ink, appearing to read "Toby O'Hara", written in a cursive style.

Toby O'Hara
General Manager
Healthcare Materials Management Services
www.hmms.on.ca

Middlesex Hospital Alliance Organizational Chart



March 2026

