



**Brockville  
General Hospital**

**Right here, with you.**

Appendix A

## **FORCED AND CHILD LABOUR REPORT**

*Financial Year April 01, 2023, to March 31, 2024*



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## Introduction

This Report has been prepared in accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“the Act”) in relation to the fiscal year from April 01, 2023, to March 31, 2024.

This Report was developed following consultation with relevant Brockville General Hospital (BGH) personnel and personnel from Mohawk Medbuy Corporation (MMC), and outlines actions taken by BGH during the fiscal year to prevent and reduce the risk of forced and/or child labour within its operations and supply chains.

BGH is committed to respecting human rights as a fundamental principle in our operations.

This Report has been approved by BGH’s Board of Directors.

## Structure, Activities, and Supply Chains

### Structure

BGH is a medium sized community hospital in Brockville, Ontario, governed by the *Public Hospitals Act*, which regulates the operation of public hospitals within the province.

BGH was incorporated under the laws of Canada in 1885 and was continued under the *Canada Business Corporations Act* (the “CBCA”) by certificate of continuance dated April 24, 1978. The registered office of BGH is 75 Charles Street, Brockville, Ontario, Canada, K6V 1S8.

BGH is the largest employer in Leeds Grenville, with 1,050 staff, 160 physicians, 200 volunteers, 500 students annually, and has an annual operating budget of approximately \$120 million.

Additional information about BGH, including its annual reports and audited financial statements, is available at [www.brockvillegeneralhospital.ca](http://www.brockvillegeneralhospital.ca).

### Activities

BGH has a long history of rising to the challenge when the community is in need.



Whether we are pioneering local access to care, building modern diagnostic, surgical and healing spaces, or meeting the challenges facing our healthcare system, we are here for our patients and their families.

BGH has a solid foundation to fulfill its vision of ***achieving excellence together***. Through teamwork, partnership, and the support of our community, we proudly offer a full range of acute care services, including:

- Emergency and Intensive Care,
- Medical/Surgical Care,
- Women and Children's Health Program,
- Surgical Services and Day Surgery,
- Complex Continuing Care and Rehabilitation,
- Palliative Care Program,
- Inpatient and Community Mental Health Programs, and
- Various Ambulatory Care Clinics and Diagnostics.

## Supply Chains

BGH's supply chain activities include purchasing a broad range of goods and services from international, national, regional, and local suppliers.

BGH relies on a third-party, MMC, for a majority of its supply chain activities. MMC is a national, not-for-profit, shared services organization trusted by hundreds of Canadian hospitals and health care providers to drive value, efficiencies, legal compliance, and cost savings on the supplies and services they use. MMC is an entity under the Act and subject to its own reporting obligations.

MMC is expected to manage BGH's supply chains, including competitive procurement processes (e.g. RFPs) and contracts, in a way that complies with all legislation and is consistent with fair and ethical business practices.

Items procured by BGH fall into the following categories:

### Equipment

Including medical, mechanical, office, infrastructure, and safety equipment.

### Supplies

Including medical, mechanical, office, infrastructure, and safety supplies.



## Services

Including agreements for maintenance and repair on equipment procured by BGH. Construction services for maintenance, repair, and development of the hospital's infrastructure (e.g. plumbing, electrical, mechanical, and other trades as required). Landscaping and groundskeeping services, including snow removal and lawn/garden care services.

## Policies and Due Diligence

There are several policies, processes, and practices across BGH which minimize the risk of forced labour and/or child labour practices in our operations and within our supply chains.

### Policies

BGH's human resources, finance, and quality and risk departments are among those that ensure compliance with laws and internal policies. Policies like the Code of Conduct, Workplace Harassment and Discrimination Prevention, Conflict of Interest, General Executive Limitations, Signing Authority, Purchasing and Procurement, and Whistleblowing policies, which promote legal and ethical business practices within our operations, and our supply chains.

### Code of Conduct

Our Code of Conduct establishes value-based principles for how we interact and treat internal and external stakeholders with respect and dignity in all our interactions.

### Workplace Harassment and Discrimination Prevention

Commits BGH to providing a working environment in which all individuals are treated with respect and dignity in accordance with the *Ontario Human Rights Code*.

### Conflict of Interest

Our Conflict of Interest policy requires all BGH affiliates to carry out their duties honestly, responsibly and in accordance with the highest ethical and legal standards.

### General Executive Limitations

Holds Executives responsible to establish management processes to ensure that all practices, activities, and decision making are not imprudent, illegal, in violation of commonly accepted business and professional ethics, or in violation of relevant legislation and regulations.



### Signing Authority

Ensures the appropriate level of authority is obtained for all operating, capital and business transactions and that these decisions are consistent with the strategic plan, hospital policy and budget, and in compliance with legislation.

### Purchasing and Procurement

Identifies that BGH will use MMC as its primary contracting agent for procurement of goods and services (with some exceptions) and will utilize Group Purchasing Organizations (GPOs) where appropriate. This policy commits BGH to compliance with Ontario's [Broader Public Sector Procurement Directive](#) (BPSPD), and the [Building Ontario Businesses Initiative Act \(BOBI\)](#). The BPSPD ensures that publicly funded goods and services are acquired through a process that is open, fair, and transparent, and establishes a Supply Chain Code of Conduct that Broader Public Sector (BPS) organizations must follow. The BOBI Act requires BPS organizations to contribute to the growth of Ontario business by providing for circumstances in which public-sector entities are required to give Ontario businesses preferential scoring when conducting procurement initiatives for goods and services over a specified threshold amount.

### Whistleblowing

Our Whistleblowing policy commits BGH to the highest standard of business and ethical conduct and values openness and transparency in all matters of business. It establishes internal and external confidential and anonymous reporting systems. Any disclosures reported are investigated internally and, where appropriate, with the assistance of external advisers. Known or suspected breaches of the Code of Conduct, or other concerns, can be reported internally to the Vice-President, People & Support Services, or externally through Integrity Counts, a third party which allows for confidential and anonymous reporting. Integrity Counts reports can be made online through its secure and confidential reporting website – [www.integritycounts.ca](http://www.integritycounts.ca)

### Due Diligence

#### Operations

BGH's commitment to respecting human rights is embedded in our corporate policies and practices. In our operations, we do not utilize forced or compulsory labour and forbid child labour in our workforce.

All of our employees are above the legal minimum employment age in Ontario and are recruited and provided with working conditions and the payment of wages and benefits that comply with applicable laws and regulations. All employees must be 18 years of age at minimum.



A majority of our employees are highly skilled and trained professionals including nurses, allied health professionals, and administrative staff. Eighty-nine percent (89%) of our workforce is represented by a trade union with their terms and conditions of employment negotiated and outlined in a collective agreement.

We believe that the risk of forced labour and/or child labour among our personnel is exceptionally low to nil.

### Supply Chains

As an MMC member, BGH relies upon the efforts of MMC for the purposes of managing and monitoring its supply chain operations and compliance programs. MMC is subject to their own reporting requirements under the Act.

MMC provided its membership a letter of attestation on March 13, 2024, outlining its compliance with the Act. MMC confirmed that during the reporting period, they took steps to reduce the risk of forced and/or child labour, including but not limited to:

- Modified competitive procurement templates (e.g. RFP), to include language that suppliers/vendors bidding for Hospital business must attest to the following: *“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.”*
- Modified standard contract language to include the following in Representation and Warranties which the successful supplier/vendor must agree to: *“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.”*

MMC formalized its commitment to sustainability and Environmental, Social, & Governance (ESG) practices through the creation of a dedicated ESG team. This group is responsible for program development to ensure MMC's ongoing sustainability, and to support its members as an enabler of a cohesive, sustainable health care supply chain.

MMC has advised its members that it has not been made aware of any instances where forced labour and/or child labour exists in current supply chains, but should such instances become known, MMC will inform its membership.

Going forward, over the coming reporting periods, MMC is planning iterative improvements to the activities undertaken relative to the Act and health care supply chains. These include the development of internal policy and training for those in sourcing and supply chain roles.



BGH and MMC comply with the BPS Procurement Directive and BOBI, which in turn reduces the risk of forced labour and/or child labour in its supply chains.

## Supply Chain Risks

With the enactment of the Act, BGH has a plan to go forward, in partnership with MMC, to minimize the risk of forced and/or child labour in our supply chains. Known risks include:

### Volatility in Global Supply Chains

Supply chain volatility during the COVID-19 pandemic led to many vendor amalgamations over the past several years, resulting in reduced availability of many preferred products, and in some cases, the elimination of entire product lines. In order to ensure patient care is not compromised, off-contract vendor substitutions have become commonplace. Although substitutions are approved for sale in Canada, it is difficult to discern their country of origin.

### Existing Contracts

Vendor and supplier contracts that were in existence prior to the Act coming into effect do not have standardized forced labour and/or child labour attestation language built into them. This risk will continue until existing contracts expire and are renewed or replaced.

## Remediation Measures

We did not identify any instances of forced labour and/or child labour in our operations or supply chains during the reporting period. In the event that BGH is informed of, or discovers, the potential or confirmed presence of forced and/or child labour in its operations or supply chains, BGH will ask the company to investigate and take appropriate remedial measures.





## Loss of Income

As BGH did not identify any instances of forced labour and/or child labour in its operations or supply chains, no measures were taken to remediate the loss of income to the most vulnerable families that resulted from measures taken to eliminate the use of forced labour and/or child labour.

## Training

During the reporting period, BGH provided awareness materials on the Act to the following groups/persons:

- Board of Directors,
- Senior Leadership Team,
- Leaders heading the Supply Chain and Procurement functions, Finance function, Human Resources function, and Quality & Risk function.

During the reporting period, voluntary computer-based training was available to all BGH employees on:

- Working Together – The Ontario Human Rights Code and the AODA
- Human Rights 101
- Call it Out: Racism, Discrimination and Human Rights.

## Assessing Effectiveness

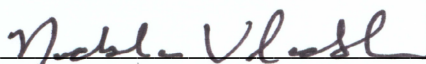
BGH has introduced certain measures over the last fiscal year aimed at reducing the risk that forced labour and/or child labour will be used in its activities and in its supply chains. It has not yet taken any measure to assess the efficiency of such measures.



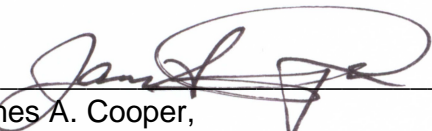
## Approval and Attestation

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.

I have the authority to bind the corporation:

  
\_\_\_\_\_  
Nick Vlacholias,  
President & Chief Executive Officer

\_\_\_\_\_  
May 24, 2024  
Date

  
\_\_\_\_\_  
James A. Cooper,  
Chair, Board of Directors

\_\_\_\_\_  
May 24, 2024  
Date

## Identifying information

Questions marked with an asterisk (\*) are mandatory.

1. \*This report is for which of the following? (Required)

Response: Entity

2. \*Legal name of reporting entity or government institution (Required)

Response: Brockville General Hospital

3. \*Financial reporting year (Required)

Response: April 1, 2023 - March 31, 2024

4. \*Is this a revised version of a report already submitted this reporting year? (Required)

Response: No

4.1 \*If yes, identify the date the original report was submitted. (Required)

4.2 \*Describe the changes made to the original report, including by listing the questions or sections that were revised (1,500 character limit). (Required)

5. For entities only: Business number(s) (if applicable):

Response: 118819655

6. For entities only: \*Is this a joint report? (Required)

Response: No

6.1 \*If yes, identify the legal name of each entity covered by this report. (Required)

6.2 Identify the business number(s) of each entity covered by this report (if applicable).

7. For entities only: \*Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Required)

Response: No

7.1 \*If yes, indicate the applicable law(s). Select all that apply. (Required)

The United Kingdom's *Modern Slavery Act 2015*

Australia's *Modern Slavery Act 2018*

California's *Transparency in Supply Chains Act*

Other, please specify:

**8. For entities only: \*Which of the following categorizations applies to the entity? Select all that apply. (Required)**

**Responses:**

Listed on a stock exchange in Canada

Canadian business presence (select all that apply):

**Has a place of business in Canada**

**Does business in Canada**

**Has assets in Canada**

**Meets size-related thresholds (select all that apply):**

**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**

**9. For entities only: \*Which of the following sectors or industries does the entity operate in? Select all that apply. (Required)**

**Responses:**

Agriculture, forestry, fishing and hunting

Mining, quarrying, and oil and gas extraction

Utilities

Construction

Manufacturing

Wholesale trade

Retail trade

Transportation and warehousing

Information and cultural industries

Finance and insurance

Real estate and rental and leasing

**Professional, scientific and technical services**

Management of companies and enterprises

Administrative and support, waste management and remediation services

Educational services

**Health care and social assistance**

Arts, entertainment and recreation

Accommodation and food services

Other services (except public administration)

**Public administration**

**Other, please specify: We are an Ontario Hospital, regulated by the Ontario Public Hospitals Act.**

**10. For entities only: \*In which country is the entity headquartered or principally located? (Required)**

**10.1 If in Canada: \*In which province or territory is the entity headquartered or principally located? (Required)**

**Response: Brockville, Ontario - Canada.**

**11. For government institutions only: \*Is this a report for a federal Crown corporation or a subsidiary of a federal Crown corporation? (Required)**

**Response:**

Yes

No

**11.1 \*If yes, which of the following sectors or industries does the Crown corporation or subsidiary operate in? Select all that apply. (Required)**

Agriculture, forestry, fishing and hunting

Mining, quarrying, and oil and gas extraction

Utilities

Construction

Manufacturing

Wholesale trade

Retail trade

Transportation and warehousing

Information and cultural industries

Finance and insurance

Real estate and rental and leasing

Professional, scientific and technical services

Management of companies and enterprises

Administrative and support, waste management and remediation services

Educational services

Health care and social assistance

Arts, entertainment and recreation

Accommodation and food services

Other services (except public administration)

Public administration

Other, please specify:

**11.2 \*If yes, in which province or territory is the Crown corporation or subsidiary headquartered or principally located? (Required)**

## **Annual Report**

### **Reporting for entities**

**1. \*What steps has the entity taken in the 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. (Required)**

#### **Responses:**

Mapping activities

Mapping supply chains

Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

Developing and implementing an action plan for addressing forced labour and/or child labour

#### **Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily**

Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour

Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains

Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour

Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains

Developing and implementing child protection policies and processes

#### **Developing and implementing anti-forced labour and/or -child labour contractual clauses**

Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists

Auditing suppliers

Monitoring suppliers

Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour

Developing and implementing grievance mechanisms

#### **Developing and implementing training and awareness materials on forced labour and/or child labour**

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

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

Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour

Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks

Information not available for this reporting period

Other, please specify: We have conducted an internal assessment of child labour in our organization's activities.

2. Please provide additional information describing the steps taken (if applicable) (1,500 character limit).

**Response:** Since becoming aware of the requirements of Bill S-11, Brockville General Hospital (BGH) has worked with Mohawk Medbuy Corporation (MMC), for guidance, support, and partnership. MMC provides procurement and contract management services for BGH. MMC has provided a letter of attestation to BGH confirming the steps it has taken in the past year to minimize the risk of forced and/or child labour in supply chain activities. Initiatives include - Modified competitive procurement templates (RFPs), to include vendor attestations specific to forced and/or child labour; Modified standard contract language requiring vendors to warrant that the goods/services provided under contract are not the result of, and in no way involve, forced and/or child labour. A review of BGH's workforce to verify all staff are legal to work in Canada and at minimum age of eighteen (18). During the reporting period, BGH provided awareness materials on the Act to the following groups/persons: Board of Directors, Senior Leadership Team, Leaders heading the Supply Chain and Procurement functions, Finance function, Human Resources function, and Quality & Risk function. During the reporting period, voluntary computer-based training was available to all BGH employees on: Working Together – The Ontario Human Rights Code and the AODA, Human Rights 101, and Call it Out: Racism, Discrimination and Human Rights.

3. \*Which of the following accurately describes the entity's structure? (Required)

**Response:**

**Corporation**

Trust

Partnership

Other unincorporated organization

4. \*Which of the following accurately describes the entity's activities? Select all that apply. (Required)

**Responses:**

Producing goods (including manufacturing, extracting, growing and processing)

in Canada

outside Canada

**Selling goods**

**in Canada**

outside Canada

**Distributing goods**

**in Canada**

outside Canada

**Importing into Canada goods produced outside Canada**

Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

5. Please provide additional information on the entity's structure, activities and supply chains (1,500 character limit).

**Response:** BGH is medium sized community hospital in Brockville, ON., and is governed by the Public Hospitals Act. BGH provides a full range of acute care services including Emergency and Intensive Care, Medical/Surgical, Women and Children's Health, Surgical Services and Day Surgery, Complex Continuing Care and Rehabilitation, Palliative Care, Inpatient and Community Mental Health, and various Ambulatory Care Clinics. BGH's supply chain activities include purchasing a broad range of goods and services from international, national, regional, and local suppliers. BGH relies on a third-party, Mohawk Medbuy Corporation (MMC), for a majority of its supply chain activities. MMC is a national, not-for-profit, shared services organization trusted by hundreds of Canadian hospitals and health care providers to drive value, efficiencies, legal compliance, and cost savings on the supplies and services they use. MMC is an entity under the Act and subject to its own reporting obligations. MMC is expected to manage BGH's supply chains, including competitive procurement processes (e.g. RFPs) and contracts, in a way that complies with all legislation and is consistent with fair and ethical business practices. Items procured by BGH fall into the following categories: Equipment and Supplies (including medical, mechanical, office, infrastructure, and safety equipment), and Services (including agreements for maintenance and repair on equipment procured by BGH. Construction services for maintenance, repair, and development of the hospital's infrastructure (e.g. plumbing, electrical, mechanical, and other trades as required). Landscaping and groundskeeping services, including snow removal and lawn/garden care services).

6. \*Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

**Response:**

**Yes**

No

6.1 \*If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

**Embedding responsible business conduct into policies and management systems**

Identifying and assessing adverse impacts in operations, supply chains and business relationships

Ceasing, preventing or mitigating adverse impacts

Tracking implementation and results

Communicating how impacts are addressed

Providing for or cooperating in remediation when appropriate



**7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500 character limit).**

**Response:** BGH's human resources, finance, and quality and risk departments are among those that ensure compliance with laws and internal policies. Policies like the Code of Conduct, Workplace Harassment and Discrimination Prevention, Conflict of Interest, General Executive Limitations, Signing Authority, Purchasing and Procurement, and Whistleblowing policies, which promote legal and ethical business practices within our operations, and our supply chains. Code of Conduct - Our Code of Conduct establishes value-based principles for how we interact and treat internal and external stakeholders with respect and dignity in all our interactions. Workplace Harassment and Discrimination Prevention - Commits BGH to providing a working environment in which all individuals are treated with respect and dignity in accordance with the Ontario Human Rights Code. Conflict of Interest - Our Conflict of Interest policy requires all BGH affiliates to carry out their duties honestly, responsibly and in accordance with the highest ethical and legal standards. General Executive Limitations - Holds Executives responsible to establish management processes to ensure that all practices, activities, and decision making are not imprudent, illegal, in violation of commonly accepted business and professional ethics, or in violation of relevant legislation and regulations. Signing Authority - Ensures the appropriate level of authority is obtained for all operating, capital and business transactions and that these decisions are consistent with the strategic plan, hospital policy and budget, and in compliance with legislation. Purchasing and Procurement - Identifies that BGH will use MMC as its primary contracting agent for procurement of goods and services (with some exceptions) and will utilize Group Purchasing Organizations (GPOs) where appropriate. This policy commits BGH to compliance with Ontario's Broader Public Sector Procurement Directive (BPSPD), and the Building Ontario Businesses Initiative Act (BOBI). The BPSPD ensures that publicly funded goods and services are acquired through a process that is open, fair, and transparent, and establishes a Supply Chain Code of Conduct that Broader Public Sector (BPS) organizations must follow. The BOBI Act requires BPS organizations to contribute to the growth of Ontario business by providing for circumstances in which public-sector entities are required to give Ontario businesses preferential scoring when conducting procurement initiatives for goods and services over a specified threshold amount. Whistleblowing - Our Whistleblowing policy commits BGH to the highest standard of business and ethical conduct and values openness and transparency in all matters of business. It establishes internal and external confidential and anonymous reporting systems. Any disclosures reported are investigated internally and, where appropriate, with the assistance of external advisers. Known or suspected breaches of the Code of Conduct, or other concerns, can be reported internally to the Vice-President, People & Support Services, or externally through Integrity Counts, a third party which allows for confidential and anonymous reporting. Integrity Counts reports can be made online through its secure and

**8. \*Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)**

**Response:**

Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

**Yes, we have started the process of identifying risks, but there are still gaps in our assessments.**

No, we have not started the process of identifying risks.

**8.1 \*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. (Required)**

The sector or industry it operates in

The types of products it produces, purchases or distributes

The locations of its activities, operations or factories

**The types of products it sources**

The raw materials or commodities used in its supply chains

Tier one (direct) suppliers

Tier two suppliers

Tier three suppliers

Suppliers further down the supply chain than tier three

The use of outsourced, contracted or subcontracted labour

The use of migrant labour

The use of forced labour

The use of child labour

None of the above

**Other, please specify: Volatility in Global Supply Chains - Supply chain volatility during the COVID-19 pandemic led to many vendor amalgamations over the past several years, resulting in reduced availability of many preferred products, and in some cases, the elimination of entire product lines. In order to ensure patient care is not compromised, off-contract vendor substitutions have become commonplace. Although substitutions are approved for sale in Canada, it is difficult to discern their country of origin. Existing Contracts - Vendor and supplier contracts that were in existence prior to the Act coming into effect do not have standardized forced labour and/or child labour attestation language built into them. This risk will continue until existing contracts expire and are renewed or replaced.**

9. \*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? Select all that apply. (Required)

Agriculture, forestry, fishing and hunting

Mining, quarrying, and oil and gas extraction

Utilities

Construction

Manufacturing

Wholesale trade

Retail trade

Transportation and warehousing

Information and cultural industries

Finance and insurance

Real estate and rental and leasing

Professional, scientific and technical services

Management of companies and enterprises

Administrative and support, waste management and remediation services

Educational services

**Health care and social assistance**

Arts, entertainment and recreation

Accommodation and food services

Other services (except public administration)

Public administration

None of the above

Other, please specify

10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit).

**Response: Volatility in Global Supply Chains - Supply chain volatility during the COVID-19 pandemic led to many vendor amalgamations over the past several years, resulting in reduced availability of many preferred products, and in some cases, the elimination of entire product lines. In order to ensure patient care is not compromised, off-contract vendor substitutions have become commonplace. Although substitutions are approved for sale in Canada, it is difficult to discern their country of origin. Existing Contracts - Vendor and supplier contracts that were in existence prior to the Act coming into effect do not have standardized forced labour and/or child labour attestation language built into them. This risk will continue until existing contracts expire and are renewed or replaced.**

**11. \*Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)**

**Response:**

Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.

Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

**No, we have not taken any remediation measures.**

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

**11.1 \*If yes, which remediation measures has the entity taken? Select all that apply. (Required)**

Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support

Compensation for victims of forced labour or child labour and/or their families

Actions to prevent forced labour or child labour and associated harms from reoccurring

Grievance mechanisms

Formal apologies

Other, please specify.

**12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).**

**Response: N/A**

**13. \*Has the entity 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? (Required)**

Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.

Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

No, we have not taken any remediation measures.

**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 and supply chains.**

**14. Please provide additional information on any measures the entity has taken 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 (if applicable) (1,500 character limit).**

**Response: N/A**

15. \*Does the entity currently provide training to employees on forced labour and/or child labour? (Required)

**Response: Yes**

Yes

No

15.1 \*If yes, is the training mandatory? (Required)

Yes, the training is mandatory for all employees.

Yes, the training is mandatory for employees making contracting or purchasing decisions.

Yes, the training is mandatory for some employees.

**No, the training is voluntary.**

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit).

**Response: Training materials specific to the Act have not been developed or rolled out at BGH. However, during the reporting period, BGH provided awareness materials on the Act to the following groups/persons: Board of Directors, Senior Leadership Team, Leaders heading the Supply Chain and Procurement functions, Finance function, Human Resources function, and Quality & Risk function. Further, during the reporting period, voluntary computer-based training was available to all BGH employees on: Working Together – The Ontario Human Rights Code and the AODA, Human Rights 101, and Call it Out: Racism, Discrimination and Human Rights.**

17. \*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? (Required)

**Response:**

Yes

**No**

17.1 \*If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Required)

Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour

Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses

Partnering with an external organization to conduct an independent review or audit of the organization's actions

Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators

Other, please specify.

18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).

**Response: N/A**

**Reporting for Government institutions**

*Note - Remainder of questionnaire deleted as it is applicable to federal government institutions only.*