



**Brockville
General Hospital**

Right here, with you.

FORCED AND CHILD LABOUR REPORT

Financial Year April 01, 2024, to March 31, 2025



Contents

Introduction.....	2
Structure, Activities, and Supply Chains.....	2
Structure	2
Activities.....	2
Supply Chains.....	3
Equipment	3
Supplies.....	3
Services.....	3
Policies and Due Diligence	4
Policies	4
Code of Conduct	4
Workplace Harassment and Discrimination Prevention.....	4
Conflict of Interest	4
General Executive Limitations	4
Signing Authority	4
Purchasing and Procurement.....	4
Whistleblowing	5
Due Diligence.....	5
Operations.....	5
Supply Chains	5
Supply Chain Risks	7
Volatility in Global Supply Chains	7
Existing Contracts	7
Remediation Measures.....	7
Loss of Income	7
Training	7
Assessing Effectiveness.....	8
Approval and Attestation	9



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, 2024 to March 31, 2025.

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 \$130 million.

Additional information about BGH, including its annual reports and audited financial statements, is available at 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

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 7, 2025, 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:

- Providing Environmental, Social and Governance (ESG) training (including that specific to Bill S-211) to all relevant employees (including all Sourcing staff). This training highlights obligations, Request for Proposal (RFP), and contract language relevant to Bill S-211 and guides the employees to not allow removal of that language through any negotiations;
- Issuing a “Supplier Risk Assessment” in September 2024 to their top 200 suppliers, and continuing to collect this data, including any EcoVadis or similar 3rd party risk assessment reports; and
- Making preparations to launch a “Supplier Code of Conduct” in fiscal year 2025-26 which will further reinforce Mohawk Medbuy’s standards and expectations of suppliers (including the elimination of forced labour and child labour).

In the previous reporting period, MMC:

- 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 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.

MMC formalized an emphasis on sustainability and ESG elements, through the creation of a focused ESG team. This team is responsible for program development, to ensure the organization’s ongoing sustainability, as well as supporting its Members as an enabler of a cohesive sustainable health care supply chain built on a high degree of standards.

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

Starting with the past 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
- Cultural Competency

Assessing Effectiveness

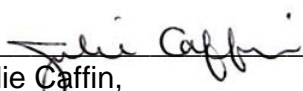
BGH has introduced certain measures over the last fiscal year aimed at reducing the risk that forced labour and/or child labour will be used in its activities and in its supply chains. It has not yet taken any measure to assess the efficiency of such measures.



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:

 _____ Julie Caffin, President & Chief Executive Officer	<u>April 24, 2025</u> Date
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 _____ James Eastwood, Chair, Board of Directors	<u>April 24, 2025</u> Date
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