

Fighting Against Forced Labour and Child Labour in Supply Chains Act

Annual Report 2024/25



St. Thomas Elgin General Hospital

Reporting period: April 1, 2024-March 31, 2025

Business Number: 108043027

Entity Categorization: Broader Public Sector

Sector: Healthcare

Location: St. Thomas, ON

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Introduction

This report outlines St. Thomas Elgin General Hospital's (STEGH) efforts and actions taken to comply with the **Fighting Against Forced Labour and Child Labour in Supply Chains Act** (the Act), as part of our commitment to ethical procurement and human rights within our supply chains. As a healthcare provider, we are dedicated to ensuring that all products and services we procure meet the highest ethical standards. STEGH is committed to ensuring that forced and child labour are not present in any part of our supply chains. We recognize that this is an ongoing process that requires continuous monitoring, due diligence, and collaboration with key partners.

As required by Section 11 of the Act, STEGH must include in its annual report the steps it took during the previous fiscal year to prevent and reduce the risk of using forced labour or child labour in any part of its supply chain—whether in Canada, abroad, or in goods it imports into Canada.

Annual Report must include information on:

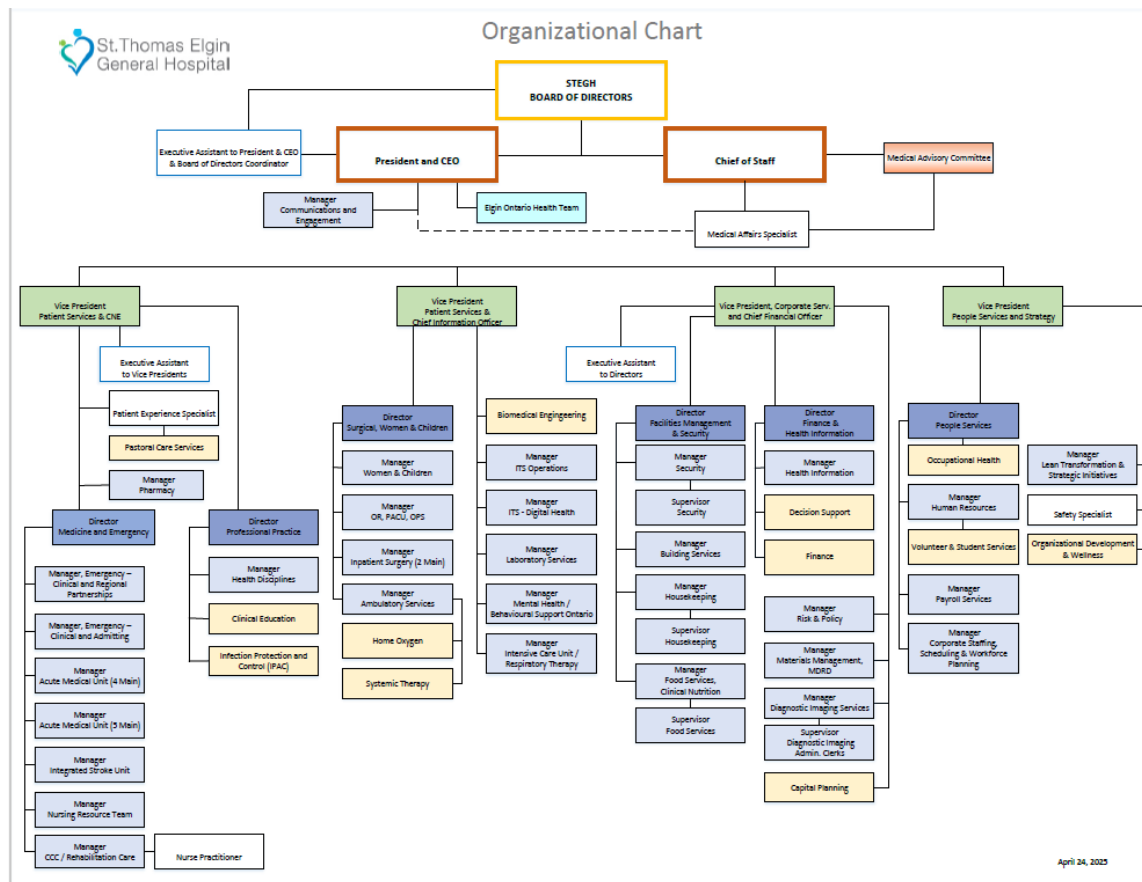
- Its structure, activities and supply chains
- Its policies and due diligence processes in relation to forced labour and child labour
- The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk
- Any measures taken to remediate any forced labour or child labour
- Any measures 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
- The training provided to employees on forced labour and child labour
- How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

Structure, Activities, and Supply Chain

St. Thomas Elgin General Hospital is a fully accredited hospital serving the City of St. Thomas and all seven municipalities within the County of Elgin. We have a proud history and legacy in the community with over 70 years of service. STEGH offers a full range of services, including: outpatient care, diagnostic imaging, inpatient acute care, emergency services, post-acute care, and regional satellite services.

To achieve the best health outcomes for patients, STEGH continually seeks innovative ways to deliver services, engage with patients and the community, invest in its people, and collaborate with health care partners.

STEGH employs more than 1,100 staff and 230 physicians. We have 179 inpatient beds. Attached is STEGH's organizational chart.



Supply Chain Overview

The majority of STEGH's procurement is through agreements leveraged by trusted procurement partners such as Shared Services Organizations (SSO) **HealthCare Materials Management Services (HMMS)** and Group Purchasing Organizations (GPO) **Mohawk Medbuy Corporation (MMC)**, **HealthPro Procurement Services Inc.**, and Ontario enterprise **Vendor Of Record (VOR)** arrangements. These agreements cover a wide range of products, from medical and surgical supplies to pharmaceuticals, equipment, devices and services.

While we rely on trusted procurement partners, we recognize that global supply chains may carry risks related to forced and child labour. Textiles, electronics, and surgical instrument manufacturing to be areas of greater risk. We will therefore focus our attention on these areas when we commence our risk assessment activities.

Policies, Due Diligence

STEGH's Procurement Policy has been updated to include the following language:

This policy outlines the responsibilities and procedures for the solicitation of Supplier bids, and to award contracts for goods and services. This policy also ensures ethical, efficient and accountable sourcing, contracting and purchasing activities within the organization. STEGH adheres to the Broader Public Sector Procurement (BPS) Directive; Building Ontario Businesses Initiative (BOBI) Act; and Bill S-211 Fighting against Forced Child Labour in Supply Chain.

18.0 Forced Labour and/or Child Labour

18.1 *STEGH requires vendors to have policies and procedures in place for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains.*

Our due diligence process includes collaboration with our GPO and SSO procurement partners. We will conduct and independent assessments where necessary. Both MMC and HMMS have issued letters to their members outlining the actions that they have taken towards compliance with Fighting Against Forced Labour and Child Labour in Supply Chains Act. These action include but are not limited to revision of: policies, competitive procurement templates, standard contract language.

Risks

Through our agreements with **HMMS**, **MMC**, **HealthPro**, and Ontario **VOR**, we rely on their established frameworks to assess risks associated with forced and child labour. These partners have put measures in place to ensure that we are not procuring goods produced from forced labour or forced child labour. We work alongside these organizations to ensure they align with our ethical procurement standards.

Measures Taken to Remediate Forced Labour and Child Labour and Loss of Income

STEGH has leveraged existing GPO or SSO agreements. There are no known instances of forced labour or child labour in our current supply chains.

Training

We provide ongoing training for our procurement team to ensure they understand and are actively engaged in the process of review, analysis and revision as we aim to implement best practices in preventing forced and child labour in supply chains. This training has been provided in the form of attending Ontario Hospital Association (OHA) webinars, review of OHA guidance documents, and review of 2024 Forced Labour in Canadian Supply Chain reports submitted by peer and partner organizations.

Assessment of Effectiveness

STEGH has recently begun implementing policies to address forced labour and child labour in its supply chains. No actions were undertaken in the previous fiscal year to assess the effectiveness of these policy revisions. Processes to assess effectiveness will be established in the next fiscal year.

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 certify that the Board of Directors of St. Thomas Elgin General Hospital has approved this Annual Report.

Date: May 7, 2025

Name: Dan Ross

Title: Chair, Board of Directors



I have the authority to bind St. Thomas Elgin General Hospital
