

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

Financial period,  
April 1, 2023, to March 31, 2024

**St. Mary's General Hospital, a division of the  
St. Joseph's Health System**

**Prepared in accordance with the requirements of the "Fighting Against Forced Labour and Child Labour in Supply Chains Act", (the "Act") and in particular section 11.**

**TO:** The Board of St. Mary's General Hospital, (the "Board")

**FROM:** Mike Gourlay

VP Corporate Services & Chief Financial Officer

**Date:** May 02, 2024

**REPORTING PERIOD:** April 1, 2023, to March 31, 2024

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On behalf of St. Mary's General Hospital, 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.

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Mike Gourlay  
VP Corporate Services & Chief Financial Officer  
St. Mary's General Hospital



**[Signature]**

**Date:** May 23 2024

I have the authority to bind St. Mary's General Hospital

I certify that this attestation has been approved by the Board of St. Mary's General Hospital



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**[Signature]**

**Date:**

Tim Rollins  
Chair of the Board  
St. Mary's General Hospital

## **Executive Summary**

St. Mary's General Hospital ("SMGH") is committed to providing exceptional health care to the communities we serve as we look to create healthier communities, together. We are a value-based organization committed to a process of continuous quality improvement. Through our values of accountability and respect, we strongly believe that public reporting of performance indicators leads to system-wide benefits and best practices. SMGH employs just over 2,000 physicians and staff and is required to comply with several statutes, including the Ontario Human Rights Code and Employment Standards Act, 2000.

SMGH acknowledges and is committed to complying with Bill S-211: Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("Act"). SMGH views the Act as a necessary step forward to combat forced and child labour and to facilitate and track the work as the years progress. This annual report is SMGH's first report under this legislation and is prepared in compliance with section 11 of the Act for the financial reporting year of April 1, 2023, to March 31, 2024.

SMGH understands the process of fighting against forced labour and child labour in supply chains is complex and evolving. Hence, the adoption of the Act requires execution of ongoing and iterative processes in our organization. As such, SMGH will continue to explore opportunities to improve and enhance supply chain transparency, to develop policies and training programs for its employees.

SMGH's annual report will be available to the public online for viewing and download at: <https://www.smgh.ca/>

## **Section 1: Structure, activities, and supply chains**

St. Mary's General Hospital ("SMGH") is located in the heart of Kitchener, Ontario. SMGH is a 197-bed comprehensive community hospital. It is the second largest acute care hospital in the St. Joseph's Health System and a Regional Cardiac Care Centre. We proudly serve the residents of Waterloo, Wellington County, and extend our reach to Dufferin, Grey-Bruce and beyond.

The nearly 2,000 staff, physicians and volunteers provide excellent, compassionate care to hundreds of thousands of patients and families every year in our core areas of clinical focus:

- Cardiac Care (Regional Cardiac Centre)
- Respiratory Care (Level 1 Thoracic Surgery Centre)
- Outpatient (Day) Surgery
- General Medicine
- 24/7 Emergency Care

SMGH's supply chain encompasses various activities and processes, spanning from acquiring medical supplies and equipment to delivering patient care. Purchasing entails sourcing and procuring medical supplies, equipment, pharmaceuticals, and other necessary items and services for the hospital.

SMGH largely manages its sourcing and procurement activities through shared service organizations, primarily Mohawk Medbuy Corporation ("MMC"). SMGH also utilizes other Group Purchasing Organizations (GPO), Share Service Organizations (SSO), and vendor of records agreements available to us as a public healthcare entity such as:

- HealthPro Canada
- Healthcare Materials Management Services ("HMMS")
- OECM
- Ministry of Ontario – Vendor of Record Arrangements
- Kinetic GPO

Most goods and services required by SMGH are procured from the Canadian market. However, depending on the nature of the products and their availability, some items may be sourced from outside of Canada. As mentioned above, regardless of the sourcing location most procurement activities of SMGH, including supplier and product identification and qualification, are managed by shared service groups.

## **Section 2: Policies and due diligence processes**

SMGH is a member of MMC, which manages most of the contracts utilized at SMGH. MMC has confirmed in a letter to its members that they have adjusted their standard contract language and competitive procurement templates to incorporate clauses aimed at reducing forced and child labor as per this Act. Neither MMC nor SMGH have been notified of any instances of forced labor or child labor within our present supply chain.

## **Section 3: Risks and management of risks**

SMGH recognizes the potential risks of forced labor or child labor within their procurement and supply chains, whether direct or indirect. However, SMGH has yet to begin direct efforts to identify specific areas of their supply chain or activities that may pose such risks, aside from the work already undertaken by MMC. SMGH relies on contracts facilitated through MMC who have confirmed their due diligence and compliance with the Act.

As of today, SMGH and MMC have not received any reports of forced labor or child labor within their current supply chains. However, if such instances were to emerge, they are committed to promptly informing their membership. Additionally, MMC have implemented new provisions and requirements in their standard sourcing documents and contracts to ensure supplier compliance with relevant regulations.

## **Section 4: Remediation measures**

SMGH has not identified any areas of risks.

## **Section 5: Remediation of loss of income**

SMGH has not identified any areas of risks.

## **Section 6: Training**

SMGH has engaged in educational sessions provided by the Ontario Hospital Association, Mohawk Medbuy, and the Federal Government concerning the new Act. As of now, SMGH

has not conducted comprehensive training for its employees on the topics of forced labor and child labor.

MMC has committed to creating a dedicated and environmental, social and governance (“ESG”) team which will include training and implementation support and SMGH will be an active participant in these activities.

### **Section 7: Assessing Effectiveness**

SMGH understands the process of fighting against forced labour and child labour in supply chains is complex and evolving. Hence, the adoption of the Act requires ongoing and iterative processes in our organization. SMGH has assessed effectiveness over the past reporting year in preventing and reducing risks of forced and child labour in supply chains by actively engaging with our GPO and SSO partners and actively reviewing our internal policies to ensure compliance.

### **References:**

MMC Members - Bill S211 – Dated March 13th, 2024.



To MMC Members -  
Bill S211.pdf