

Woodstock Hospital

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S-211 COMPLIANCE REPORT



Woodstock Hospital

Report for April 1, 2024 – March 31, 2025

Business Number: 119303733

Entity Categorization: Broader Public Sector

Sector: Healthcare

Location: Woodstock, Ontario



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Forced labour can be found in every country and every sector. The International Labour Organization estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through businesses' global supply chains. There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions doing business in Canada must ensure that exploitative practices are addressed and eradicated from their supply chains.

The measures introduced through former *Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act)*, aim to increase industry awareness and transparency and drive businesses to improve practices. The Act came into force on January 1, 2024.

This report, submitted on May 31, 2025, from Woodstock Hospital, references the activities undertaken during the previous financial year.

As per subsection 11(3), an entity must provide information on each of the following:

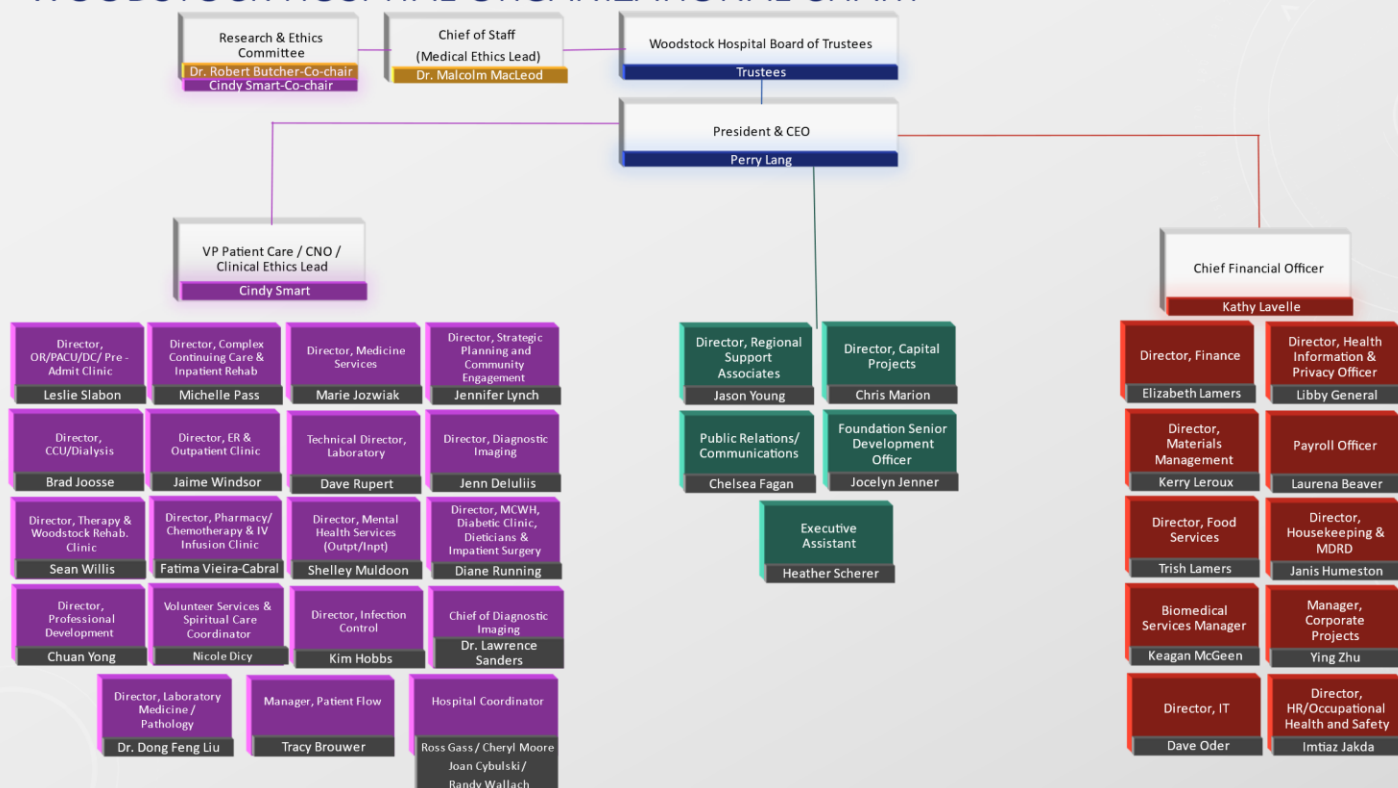
- a. Its structure, activities, and supply chains
- b. Its policies and its due diligence processes in relation to forced labour and child labour
- c. The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk
- d. Any measures taken to remediate any forced labour or child labour
- e. 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
- f. The training provided to employees on forced labour and child labour
- g. 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 Chains

Woodstock Hospital (WH) is a full-service community hospital providing acute, post-acute and emergency services, with numerous specialized clinics and outpatient services. These include but are not limited to, inpatient and outpatient surgery, cataract and carpal tunnel clinics, outpatient dialysis, chemo and infusion therapies clinic, inpatient and outpatient mental health and addictions services, two endoscopy suites, a full spectrum of diagnostic imaging modalities, as well as a very busy obstetrics unit.

WH is a not-for-profit corporation that employs approximately 1,200 staff, all located within Canada. The hospital's mission is to provide community-oriented, personalized, and quality care, with a vision of working collaboratively to advance the health and well-being of our community. The organizational structure is provided below:

WOODSTOCK HOSPITAL ORGANIZATIONAL CHART



For procurement needs, WH participates as a member of HealthPro, Mohawk Medbuy (MMC) and Kinetic Group Purchasing Organizations (GPOs), as well as being an affiliate hospital of Shared Service Organization (SSO) Healthcare Materials Management Services (HMMS). Through HMMS, we procure the majority of our Just in Time (JIT) medical/surgical items, with dedicated deliveries twice weekly. In addition, as an affiliate, we may leverage HMMS agreements for various goods and services. We rely on the GPO and SSO organizations to do their due diligence with respect to child and forced labour when engaging in competitive events and entering into subsequent agreements.

On March 7th, 2025, Mohawk Medbuy issued an updated letter to its membership concerning Bill S-211 and the steps they have taken during FY2024-2025 toward their compliance. These steps are described below and are in addition to the steps outlined in the FY2023-2024 compliance report.

MMC Update for FY 2024-2025

- Mohawk Medbuy has provided 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.
- Mohawk Medbuy issued a “Supplier Risk Assessment” in September 2024 to our top 200 suppliers, and Mohawk Medbuy continued to collect this data, including any EcoVadis or similar 3rd party risk assessment reports.

- Mohawk Medbuy's ESG Team has been preparing to launch a "Supplier Code of Conduct" in FY25 which will further reinforce Mohawk Medbuy's standards and expectations of suppliers (including the elimination of forced labour and child labour).

Steps taken by MMC the previous fiscal FY2023-2024

- Mohawk Medbuy has modified standard contract language to include the following in Representation and Warranties:
 - 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 Chain's Act).
- Mohawk Medbuy has modified 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).

In addition,

- Mohawk Medbuy 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, Mohawk Medbuy will inform their members' Chief Financial Officer.
- Mohawk Medbuy 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 our organization's ongoing sustainability, as well as supporting our members as an enabler of a cohesive sustainable health care supply chain built on a high degree of standards.

WH has requested similar information and attestations from our other GPO and SSO partners. In addition to utilizing GPO/SSO services and ministry vendors of record (VORs), we also order directly from the major distributors in the healthcare sector and when possible, prefer to support the local community of suppliers. When we cannot leverage an existing arrangement for a particular good or service, we may also issue our own Request for Quote or Proposal (RFx) to the vendor community. If we do our own RFx event, value for money is our primary financial consideration, and we do not source solely based on the lowest price. We also consider additional quantitative factors, which will require attestation of compliance with our policies for all suppliers moving forward. This, along with the Building Ontario Business Initiative (BOBI) legislation, helps to ensure that whenever possible, we are dealing with reputable local (Ontario) companies whose employees earn a living wage and participate in the workplace of their own volition.

Policies

Our Procurement Policy has been updated to include the following language: It considers both the legislation for BOBI and Bill S-211, the fight against child and forced labour in the supply chain.

Woodstock Hospital (WH) is a Broader Public Sector (BPS) facility and falls under the Broader Public Sector Procurement (BPSP) Directive, effective April 1, 2011. The BPSP Interim Procurement Measures came into effect in March 2019, and the Directive has been further updated effective January 1, 2024, to include strategies to procure goods and services from Ontario businesses or Ontario Trading Partners, wherever feasible. Further, additional consideration is given to Bill S-211, which enacts the Fighting Against Forced Labour and Child Labour and is effective May 31, 2024, for all BPSP entities. Woodstock Hospital will require our supplier base to attest to their compliance with this act.

Risks

The current risks within healthcare include that historically, many of our products, most notably disposable personal protective equipment, were made in countries like China and Malaysia, which are known to have high instances of child or forced labour. To mitigate this risk as best we can, we deal with the GPOs and the distributors/suppliers who are reputable known entities within the healthcare landscape. As mandated in the January 1st, 2024, update to the BPSP directive, we continue to try to source products produced within Ontario, and when this is not feasible, within Canada. This ensures most of our business goes to suppliers who are unlikely to participate in child or forced labour practices, thereby significantly reducing our risk.

Measures Taken to Remediate Forced Labour

Woodstock Hospital has taken the following measures to remediate forced labour, in addition to those undertaken in the previous reporting period:

Update for FY 2024-2025

- In May of 2024, Woodstock Hospital sent out a communication to our top 92 vendors representing over 80% of our annual spend, asking them to attest to their adherence to the legislation enacted by Bill S-211. We received 40 signed responses back confirming compliance with the legislation.

FY 2023-2024 Measures

- Whenever possible, leverage existing GPO/SSO agreements, which include language pertaining to forced labour.
- Updated our own RFx and agreement templates to include language around vendor compliance attestation.
- Updated the Woodstock Hospital Supply Chain Code and Conduct, as well as the Purchasing Policy, to reflect our commitment to combating child and forced labour in the supply chain.
- Wherever possible, we do business locally (Ontario), where forced labour is less likely.
- Transitioned to reusable goods that can be laundered or preprocessed locally instead of purchasing disposable items from overseas markets known to be suspect regarding forced labour.

Measures Taken to Remediate Loss of Income

Woodstock Hospital has not identified any supplier that may be knowingly or unknowingly, propagating forced labour or child labour within their supply chain. Due to the lack of findings, the Hospital has not had to take steps to remediate loss off income due to forced labour or child labour within its supply chain. The Hospital will continue to monitor any indicators of forced labour and child labour within its partnerships.

Training

All hospital procurement and sourcing activities are centralized through the Materials Management Department. All purchasing employees within the organization were trained regarding child and forced labour in the supply chain in 2024 and will continue to receive education and updates as they become available. The hospital executive team and the Board of Directors are made aware of any updates to the legislation and the overall status of our supply chain regarding child and forced labour.

Assessment of Effectiveness

- Woodstock Hospital endeavours to join existing VOR, GPO/SSO agreements, when possible, rather than issuing our own RFx events. Therefore, we rely heavily on those partner organizations to mitigate much of the risk associated with child and forced labour through their contractual language and vendor attestations.
- We have taken a proactive approach and implemented attestation strategies with our major distributors and vendor partners.

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."

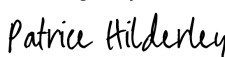
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Perry Lang
President & CEO
Woodstock Hospital
April 29, 2025

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Patrice Hilderley
Board Chair
Woodstock Hospital
April 29, 2025

I have the authority to bind Woodstock Hospital.