

ATTESTATION ON BILL S-211

Prepared in accordance with section 11 of Bill S-211
An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act

To: Board of Directors, Peterborough Regional Health Centre, (the “Board”)
From: Dr. Lynn Mikula, President & CEO, Peterborough Regional Health Centre
Date: Wednesday, May 22, 2024
Re: **April 1, 2023 to March 31, 2024 “The Applicable Period”**

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 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.

Dated at Peterborough, Ontario this 29 day of May, 2024.



X

Dr. Lynn Mikula
President & CEO, PRHC

I certify that this attestation has been approved by the Peterborough Regional Health Centre Board of Directors on this 29 day of May, 2024, and have the authority to bind Peterborough Regional Health Centre.



X

Robert Gibson
Chair, PRHC Board of Directors

Prepared in accordance with section 11 of Bill S-211
An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act

This report is being submitted for Peterborough Regional Health Centre (PRHC), an entity under the Act for the financial reporting year April 1, 2023 to March 31, 2024. This is not a revised report. PRHC is not subject to other reporting requirements under supply chain legislation in another jurisdiction.

PRHC meets the definition of an entity under the Act by meeting the following criteria:

- Has at least \$20 million in assets 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.
- Operates in the healthcare sector as a not-for-profit corporation (business number 107837312) at One Hospital Drive, Peterborough, Ontario.

In the previous financial year, PRHC has taken the following steps to reduce the risk of forced labour or child labour being used at any step in the production of goods in Canada or elsewhere by PRHC, or of goods imported into Canada by PRHC:

- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains through its shared service organization (SSO) and group purchasing organization (GPO).

Per subsection 11(3), the following information is provided:

- A. Its structure, activities and supply chains.
 - a. Under the Act, the entity procures goods that are produced outside of Canada through its shared service organizations and group purchasing organizations. PRHC is a member of Mohawk Medbuy Corporation (MMC), a national, not-for-profit shared service organization which provides all strategic sourcing for goods and services procured by the entity. All nutrition and pharmacy products are sourced and procured through HealthPro, a national not-for-profit group purchasing organization. Attached with this report are two letters confirming the assessments done by these organizations, and outlining the steps taken and processes in place related to forced labour and/or child labour.
- B. Its policies and its due diligence processes in relation to forced labour and child labour.
 - a. PRHC has no policies or due diligence processes in relation to forced labour and child labour, as all procurement is completed through MMC and HealthPro.
- 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.
 - a. This is addressed in the attached letters provided by PRHC's procurement and supply chain partners.

- D. Any measures taken to remediate any forced labour or child labour.
 - a. Not applicable, as PRHC has not identified any forced labour or child labour in our activities or supply chains.

- 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.
 - a. Not applicable, as PRHC has 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.

- F. The training provided to employees on forced labour and child labour.
 - a. PRHC does not provide training to employees on forced labour and/or child labour.
 - b. MMC is planning iterative improvements to the activities undertaken relative to this legislation and healthcare supply chains. These include the development of internal policy and training for those in sourcing and supply chain roles. PRHC will leverage this training for those in supply chain roles at the hospital.

- 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.
 - a. PRHC will conduct annual reviews with its SSO and GPO regarding their effectiveness in ensuring that forced labour and child labour are not being used in its supply chains.



March 13, 2024

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

Dear Member,

We provide this letter in connection with Bill S-211, the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("the Act", "Bill S-211", "the Bill").

In providing this letter, we have exercised care and diligence that would reasonably be expected of a Chief Operating Officer and Chief Financial Officer, Chief Information Officer & VP, Business Analytics, in these circumstances.

The following steps have been undertaken at MMC during the current fiscal year and may be included for completeness in legislative reporting undertaken by the Hospital for compliance with Bill S-211.

- MMC 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 Chains Act).
- MMC 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);
- MMC 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, MMC will inform your Chief Financial Officer.**
 - Over the coming periods, MMC is planning iterative improvements to the activities undertaken relative to this legislation and health care supply chains. These include the development of internal policy and training for those in sourcing and supply chain roles.
- MMC formalized its commitment to sustainability and ESG practices through the creation of a dedicated ESG team. This group is responsible for program development to ensure our organization's ongoing sustainability, and to support our Members as an enabler of a cohesive, sustainable health care supply chain.**

Sincerely,

MOHAWK MEDBUY

Tom Warner
CFO, CIO and VP, Business Analytics
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One team, here when you need us most.

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April 17, 2024

Meghan Darwin
Director, Corporate Services, Facilities & Emergency Preparedness
Peterborough Regional Health Centre
1 Hospital Drive
Peterborough, ON K9J 7C6

Dear Ms. Darwin:

Re: HealthPRO Canada's steps taken during the period April 1, 2023 – March 31, 2024 to prevent and reduce the risk of forced and child labour on contract items

Thank you for your continued support of HealthPRO Canada and your participation in our contracts. As your national group contracting provider for healthcare products and services, we understand the importance of our contracting processes complying with Canadian regulations.

We have reviewed our contracting processes and documents and can confirm the following:

- HealthPRO Canada Nutrition and Food, Capital Equipment, Support Services, Clinical, and Signature Services contracts commencing April 1, 2023 or afterward included a scored question in the RFPs related to the Suppliers' public facing commitment to eliminate Forced Labour as defined by the International Labour Organisation's Forced Labour Convention. This was implemented for Pharmacy Services contracts commencing after September 2023. The question scores suppliers based on how well their public-facing commitment addresses the [11 indicators](#) of forced labour.
- Although not part of any contracts starting within the 2023/24 fiscal year, HealthPRO Canada added additional informational questions regarding suppliers' reporting experience and any continuous improvement measures they have taken to address Forced and Child Labour within all levels of their supply chains.
- HealthPRO Canada's Nutrition and Food Services partner Complete Purchasing Services "CPS" (Starting October 1, 2023), strictly requires that its suppliers comply with all applicable laws, and, in addition, have multiple policies and processes to set expectations for suppliers regarding human rights and labour rights (including child labour and forced labour).
- Contracts that Peterborough Regional Health Centre are committed to that started during the 2023/24 fiscal year are attached for your records.

If you require additional information, please contact Ms. Kendra Frey, Vice President of Materials Management (905-568-3478, ext. 1320).