

**ATTESTATION**

**Attestation Form**

**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:** The Board, **Peterborough Regional Health Centre**, (the "Board")

**FROM:** Dr Lynn Mikula  
President & CEO  
Peterborough Regional Health Centre

**Date** May 28, 2025

**Re:** April 1, 2024 to March 31, 2025 ("**the Applicable Period**")

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In accordance with the requirements of the Act, 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.

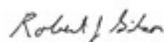
Dated at Peterborough, Ontario this 28 day of May, 2025



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Dr. Lynn Mikula  
President & CEO  
Peterborough Regional Health Centre

I certify that this attestation has been approved by the Board of the Peterborough Regional Health Centre on May 28, 2025 and have the authority to bind Peterborough Regional Health Centre.



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Robert Gibson  
Chair of the Board  
Peterborough Regional Health Centre

## ANNUAL REPORT ON 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**

This report is being submitted for Peterborough Regional Health Centre (PRHC), an entity under the Act for the financial reporting year April 01, 2024 - March 31, 2025. This is not a revised report.

Peterborough Regional Health Centre is not subject to other reporting requirements under supply chain legislation in another jurisdiction.

PRHC meets the definition of an entity by meeting the following categorizations:

- 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

And operates in the Healthcare sector as a not-for-profit corporation (business number 107837312) at 1 Hospital Drive, Peterborough, Ontario, Canada.

Peterborough Regional Health Centre has taken in the previous financial year the following steps to reduce the risk that forced labour or child labour is used at any step of 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 organizations (GPO).

As per the mandatory information report requirements, the following information is provided:

a. Its structure, activities and supply chains

- 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 who 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 to this report are the letters confirming the assessment by its SSO and GPO outlining its 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

- There are no policies or due diligence processes in relation to forced labour and child labour as all procurement is completed through MMC and HealthPro.

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705-743-2121

- 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
- PRHC has not started the process of identifying risks as that is addressed through the letters provided by its procurement and supply chain partners
- d. Any measures taken to remediate any forced labour or child labour
- Not applicable, we have not identified any forced labour or child labour in our activities and 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
- Not applicable, we have 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
- The entity does not provide training to employees on forced labour and/or child labour.
  - 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. PRHC will leverage the training for those in supply chain roles at PRHC.
- 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
- Annually, the entity will review with its SSO and GPO their effectiveness in ensuring that forced labour and child labour are not being used in its supply chains.



March 7, 2025

### 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 Marketing Officer and Senior Vice President, Strategy, in these circumstances.

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

- 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 making preparations 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).

The following steps were undertaken by Mohawk Medbuy during the **previous fiscal year**.

- 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).

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Other relevant information includes the following:

- 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 your 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.

Sincerely,

**MOHAWK MEDBUY**

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Janice Mundell  
Chief Marketing Officer and  
Senior Vice President,  
Strategy

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Peter Longo  
Chief Operating Officer



May 8, 2025

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, 2024 – March 31, 2025, regarding the Fighting Against Forced Labour and Child Labour in Supply Chains Act, Canada's modern slavery legislation.**

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 legislation.

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

- HealthPRO Canada Nutrition and Food, and Clinical Services contracts commencing April 1, 2024, or afterward, included scored questions in the Request for Proposal (RFP) documents as to the Suppliers' commitment to all steps to fight against forced labour and child labour in Supply Chains. The questions score suppliers based on how well their public-facing commitment addresses the **11 indicators** of forced labour as per the International Labour Organization (ILO). In addition, suppliers are asked to provide information on relevant policies, programs, third party audits, monitoring effort & measurable indicators, and disclosure of any legal actions, sanctions or fines that the supplier has had imposed.
- HealthPRO Canada Pharmacy contracts commencing June 1, 2024 or afterward, included scored questions in the Request for Proposal (RFP) documents as to the Suppliers' commitment to all steps to fight against forced labour and child labour in Supply Chains. The questions score suppliers based on how well their public-facing commitment addresses the **11 indicators** of forced labour as per the International Labour Organization (ILO). In addition, suppliers are asked to provide information on relevant policies, programs, third party audits, monitoring effort & measurable indicators, and disclosure of any legal actions, sanctions or fines that the supplier has had imposed.
- HealthPRO Canada's Nutrition and Food Services partner Complete Purchasing Services "CPS" also, 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).

If you require additional information, please contact Ms. Kendra Frey, Vice President, Strategic



Sourcing and Innovated Solutions [kfrey@healthprocanada.com](mailto:kfrey@healthprocanada.com) .

Yours sincerely,

A handwritten signature in black ink that reads "C. Donaldson".

Christine Donaldson  
President & CEO  
HealthPRO Canada