

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

This report is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for William Osler Health System (“Osler”). This report covers the financial year ending March 31, 2024 (“Applicable Period”).

Structure, Activities, and Supply Chains

Structure:

Osler is a public hospital under the *Public Hospitals Act*. Osler is incorporated and governed under the *Corporations Act* and will be continued under the *Ontario Not-for-Profit Corporations Act, 2010*. Additionally, the *Public Hospitals Act* and its regulations sets out additional requirements regarding the composition and responsibilities of the Board of Directors. Further details regarding Osler’s Board of Directors and Osler’s Leadership Team can be found [here](#).

Osler is a leading hospital system serving more than 1.3 million people in Brampton, North Etobicoke, Caledon and surrounding communities - one of the most culturally diverse, and fastest growing areas in Ontario. Accredited with Exemplary Standing, Accreditation Canada’s highest rating for a Canadian hospital, Osler includes Brampton Civic Hospital, Etobicoke General Hospital, Peel Memorial Centre for Integrated Health and Wellness (Peel Memorial), a Reactivation Care Unit and a Withdrawal Management Centre. Building on a legacy of clinical excellence and innovation, Osler is planning for the future with transformative developments, including the development of the new Peel Memorial Hospital.

As of March 31, 2024, Osler meets the definition of an “entity” under the Act based on the thresholds set out under the Act for number of employees, value of assets, and/or revenue.

Activities:

As a public hospital, Osler offers acute care and health-related services to its patients including emergency care, inpatient services, outpatient programs, rehabilitation and community-based care.

Osler is actively involved in medical research through the Osler Research Institute for Health Innovation, which focuses on population health, digital health, and health systems. Osler is also committed to medical education, having more than 900 health care students from a breadth of disciplines come to Osler for professional placements annually.

With respect to activities that fall under the Act, Osler engages in the following:

Selling Goods

In the Applicable Period, Osler sold a limited amount of medical products including but not limited to casts, splints, braces, and aero chambers. These goods are offered to patients as a matter of convenience and are available for purchase by patients at retailers outside of Osler.

Importing Goods from Outside Canada

The majority of Osler's goods and services are purchased from Canadian suppliers. However, if certain types of goods need to be procured from outside Canada, Osler does so indirectly through third party distributors or, to a limited extent, directly using customs brokers.

Producing goods in Canada

In the Applicable Period, Osler produced hand splints for patients. These splints were produced by Osler's occupational therapists and are custom fitted for patients.

Distributing Goods

In the operation of a hospital, Osler distributes goods across its organization to be utilized by the end user clinical areas.

Supply Chains:

Osler is subject to the *Broader Public Sector Accountability Act, 2010*, and the Broader Public Sector Procurement Directive, which governs Osler's procurement activities. During the Applicable Period, where appropriate, Osler procured with local providers of goods and services. Effective April 1, 2024, Osler complies with the new *Building Ontario Business Initiative Act, 2022*, which requires that Osler give preference to Ontario businesses when conducting procurement of certain goods and services.

Osler is a member of various group purchasing organizations that manage the sourcing and procurement for goods and services on behalf of its members who are hospitals and other health facilities. In the Applicable Period, Osler was a member of the following Group Purchasing Organizations: Shared Services West ("SSW")¹, Mohawk Medbuy Corporation ("MMC"), and HealthPro Canada. For limited purchases that are exempt from competitive procurement, or which fall below the competitive procurement monetary thresholds pursuant to the Broader Public Sector Accountability Directive, Osler purchases the goods directly through Osler's staff.

In addition, Osler outsources the maintenance of some of its hospital sites to third party providers via its public private partnership arrangements ("P3 Providers"). These agreements with P3 Providers provide for the long-term delivery of maintenance services for the hospital. While providing services to Osler, the P3 Providers provide Osler with certain goods that are required in the operation of Osler's facilities, for example, patient food services.

Steps Taken to Prevent and Reduce Risk of Forced/Child Labour

Osler has taken the following steps in the Applicable Period to prevent and reduce the risk of forced labour or child labour in its procurement activities:

¹ SSW integrated with MMC effective April 1, 2024.

- Osler has obtained from each of its Group Purchasing Organizations a letter outlining the due diligence and steps that each Group Purchasing Organization has undertaken to prevent and reduce the risk of forced labour and child labour in procurement activities undertaken on behalf of Osler. These measures may include modifying procurement templates (e.g., RFP documents, contracts) to ensure compliance of suppliers with the Act or to reduce the risk of forced labour or child labour in the supply chain, and a commitment to develop further policies and training regarding the Act. Additionally, each Group Purchasing Organization has confirmed that they are not aware of any instances of forced labour or child labour in their current supply chains.
- Osler has incorporated in its RFP templates requirements that proponents highlight their respective environmental, social, and governance practices.
- Osler has requested that its P3 Providers advise on the steps they have taken to comply with the Act.
- Osler invited one of its Group Purchasing Organizations in March 2024 to present to Osler’s managers, directors, and executives on the Act, its application, and its requirements to create awareness within the organization of the risk of forced labour and child labour in supply chains.
- In anticipation of the *Building Ontario Business Initiative Act, 2022*, coming into force on April 1, 2024, Osler provided voluntary training to its employees on giving preference to local Ontario businesses in accordance with the legislation. In conducting this training, Osler included an informational update on the Act and its requirements to create awareness of the risk of forced labour and child labour in supply chains. All members of Osler’s internal purchasing team attended these sessions.
- Osler has also consulted with other organizations such as the Ontario Hospital Association, peer hospitals, and Group Purchasing Organizations to prepare this Report.

Policies and Due Diligence Processes

Osler strives to operate in a responsible and respectful manner and to provide safe and supportive environments for its patients, employees, volunteers, physicians, visitors and third-party service providers. Osler complies with applicable provincial and federal laws in its operations, including, without limitation:

- *The Occupational Health and Safety Act.*
- *The Employment Standards Act, 2000.*
- *The Excellent Care for All Act.*
- *The Ontario Human Rights Code.*

Additionally, Osler has in place the following policies and procedures:

- *Whistleblower Policy and Procedure* furthers Osler’s commitment to the highest ethical and professional standards by requiring Osler’s personnel to report wrongdoing (including human rights violations, discrimination, or harassment) and sets out the manners in which such reports can be received by Osler, including on an anonymous basis. In the Applicable Period, Osler began the process to procure the services of an independent third party to accept whistleblower complaints on behalf of Osler to foster

trust and confidence in the whistleblower reporting process. It is anticipated that Osler's third-party vendor will be operational in the 2024-2025 financial year.

- *Ethical Decision-Making Framework* – sets out a framework for Osler's Board of Directors and Board Committee Members to utilize when making decisions, factoring in specified criteria such as quality, safety, sustainability, access, and equity.
- *Freedom of Information and Protection of Privacy Act (FIPPA) – Request Process* sets out the process whereby individuals may request access to records in the custody and control of Osler, subject to limited exceptions, which fosters and promotes transparency in Osler's operations.
- *Principles of Behaviour* sets forth the basic principles of conduct that all employees, physicians, dentists, midwives, vendors, affiliates, students, volunteers, contractors and other persons who act or provide services on behalf of Osler, must follow. The policy requires compliance with laws and ethics and is intended to promote a safe and respectful workplace environment free from all forms of harassment, violence, and discrimination.
- *Sourcing and Procurement Policy Manual* sets out basic principles that Osler employees, physicians, independent or external contractors, consultants, and all individuals who represent Osler must follow to ensure ethical, efficient and accountable purchasing activities. This policy requires all individuals involved in purchasing or other supply chain-related activities on behalf of Osler to comply with the laws of Canada and Ontario, and continuously work to improve supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share leading practices.
- *Respectful Workplace Policy and Procedure* furthers Osler's commitment to ensuring that all members of the Osler community enjoy a positive, healthy, and respectful workplace environment. This policy aims to prevent harassment (including workplace sexual harassment), provide education and resources to reinforce acceptable workplace behaviour, provide impartial and effective resolution and compliant procedures to resolve issues in a timely manner, and provide all stakeholders with fair and consistent procedures for dealing with issues of harassment, bullying, racism, or discrimination.
- *Complaint Process Policy and Procedure* sets forth an effective mechanism for reporting and resolving complaints of workplace harassment, discrimination and violence in a fair, timely, and transparent manner.
- *Workplace Violence Prevention Policy and Procedure* affirms Osler's commitment to providing a supportive, safe, and respectful environment that is free from workplace violence. This policy defines behavior that constitutes workplace violence, including sexual assault and domestic violence, and outlines procedures for reporting and resolving such incidents, as well as individual responsibilities for prevention and corrective action.
- *Recruitment Policies and Procedures* sets forth the framework and principles of Osler's hiring practices and outlines roles and responsibilities throughout the recruitment process. The recruitment process serves to ensure that, as an equal opportunity employer, Osler is committed to attracting and hiring a talented diverse workforce.

Activities and Supply Chains that Carry a Risk

Osler took steps to evaluate its supply chain activities, including mapping its supply chain and reviewing vendor lists in order to identify any parts of its business activities or supply chains that carry a risk of forced labour or child labour being used.

Currently, Osler is neither aware nor has any evidence that forced and/or child labour is used in its supply chain activities. This has been supported by Osler's Group Purchasing Organizations who have made similar statements and who have committed to notifying Osler if they become aware of any such instance.

Remediation Measures

Since Osler has not identified any forced labour or child labour in its activities and supply chains, it has not had to take remediation measures, including measures to remediate loss of income to the most vulnerable families that results from measures taken to eliminate the use of forced labour or child labour.

Employee Training

All employees of Osler, upon commencement of employment are required to complete a training module on (a) Workplace Violence and Harassment Prevention, (b) Occupational Health & Safety: Health and Safety at Work, and (c) Respectful Workplace. The Workplace Violence and Harassment Prevention module must be completed by employees annually. While these are not specific to the Act, they do contribute to creating a more respectful and safe work environment for Osler's personnel.

As previously stated, Osler has provided informational sessions to its employees on the Act, its application, and its requirements, to create awareness within the organization of the risk of forced labour and child labour in supply chains. Osler will consider additional training and the implementation of new policies, or amendments to existing policies, to address the risk of forced labour and child labour in its supply chains.

Effectiveness in Ensuring Forced/Child Labour is Not Being Used

Osler acknowledges that addressing forced labour and child labour in supply chains is an ongoing multi-faceted commitment. Osler will continue to work closely with its Group Purchasing Organizations, Ontario Hospital Association, and peer hospitals, to determine whether internal policies and additional measures are needed to assess the effectiveness in ensuring that forced labour and child labour are not used in Osler's activities and supply chains.



Attestation

Prepared in accordance with Section 11 of the “Fighting Against Forced Labour and Child Labour in Supply Chains Act”, (the “Act”)

TO: The Board of William Osler Health System (the “Board”)

FROM: Dr. Frank Martino, President and Chief Executive Officer

DATE: May 29, 2024

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

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for William Osler Health System. 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.

A handwritten signature in blue ink, appearing to read "F. Martino".

Dr. Frank Martino
President and Chief Executive Officer, William Osler Health System

I have the authority to bind William Osler Health System.

I certify that this attestation has been approved by the Board of William Osler Health System.

A handwritten signature in blue ink, appearing to read "Linda Franklin".

Linda Franklin
Chair of the Board, William Osler Health System