

niagarahealth

Extraordinary Caring. Every Person. Every Time.

***Bill S-211: Fighting Against Forced Labour  
and Child Labour in Supply Chains Act***

**Annual Report**

Financial Period: April 1, 2023, to March 31, 2024

**Niagara 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 Niagara Health System, (the “Board”)

**FROM:** Lynn Guerriero  
President & Chief Executive Officer  
Niagara Health System

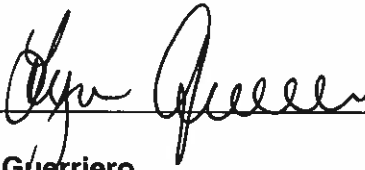
**Date:** May 28, 2024

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

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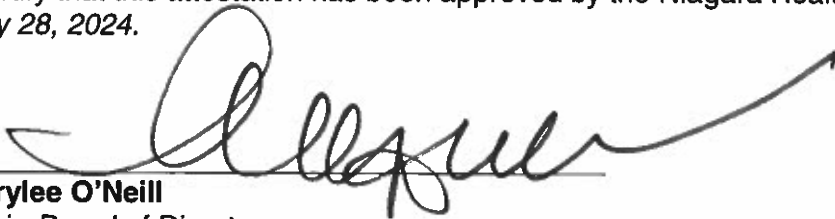
In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Niagara Health System.



**Lynn Guerriero**  
President & Chief Executive Officer  
Niagara Health System  
May 28, 2024

I certify that this attestation has been approved by the Niagara Health System on  
May 28, 2024.



**Marylee O'Neill**  
Chair, Board of Directors  
Niagara Health System

## Summary of Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour

Niagara Health System ("Niagara Health", "NH") is committed to preventing and reducing the risk of forced labour and child labour and has taken the following measures during the reporting period.

- ***Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains***

NH Strategic Sourcing and Logistics has introduced a mandatory requirement in all competitive procurement documentation for proponents to attest that their organization in no way involves forced or child labour at any step of the production of goods or services. Proponents must also describe the processes and practices implemented and their organizations that reduces or prevents this risk.

- ***Developing and implementing anti-forced labour and/or -child labour contractual clauses***

NH standard contract language has been modified to include the following:

*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).*

- ***Engaging with supply chain partners on the issue of addressing forced labour and/or child labour***

NH has worked closely with Mohawk Medbuy Corporation (MMC) and other hospital organizations to share best practices for addressing forced labour and child labour including policy and training development.

## Reporting Requirements

### I. Structure, Activities and Supply Chains

#### *Organizational Structure*

The Niagara Health System (“Niagara Health”, “NH”) is a multi-site hospital corporation comprised of five (5) sites serving over 478,000 residents across the twelve (12) municipalities of the Regional Municipality of Niagara. Niagara Health is made up of more than 7,300 employees, physicians, volunteers and patient partners who contribute to *NH's* purpose of providing Extraordinary Caring. Every Person. Every Time.

More information on the services provided at each site can be found below:

- [Fort Erie Site](#)
- [Niagara Falls Site](#)
- [Port Colborne Site](#)
- [St. Catharines Site](#)
- [Welland Site](#)

The construction of a new South Niagara Hospital began in Summer 2023 with occupancy planned for 2028. Following an open and competitive procurement process in collaboration with Infrastructure Ontario (IO), Ellis Don Infrastructure Healthcare (“EDIH”) was awarded the contract to design, build, finance and maintain this new site. The 1.3 million-square-foot hospital will be twelve (12) stories tall and will have up to 469 beds, a majority of which will be net new, increasing NH’s capacity to provide inpatient services for the region.

#### *Niagara Health’s core activities include:*

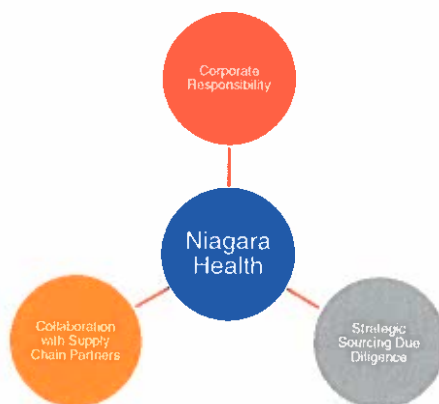
- The provision of inpatient and outpatient clinics and services, including acute, surgical, emergency and urgent, kidney, complex, mental health and addition, long term and cancer care. A full list of services is available [here](#).
- Working closely with more than 90 academic partners to advance medical education, research and knowledge.

#### *Niagara Health’s supply chain activities*

Supply chain activities are primarily the procurement and procurement of medical supplies and equipment to support patient care. Niagara Health’s purchasing hierarchy directs that product and equipment are primarily sourced through MMC initiatives. NH Strategic Sourcing and Logistics independently runs RFXs for services and renovations. All procurement activities for the South Niagara Hospital are run by the Furniture, Fixtures and Equipment (FF&E) project team. Small quantities of chargeable clinical, ED and physio items such as air casts, crutches and splints are sold to patients.

## II. Policies and Due Diligence Processes

At Niagara Health, the core values of compassion in action, driven by optimism, and achieving ambitious results guide all decision making and behaviours. NH acknowledges the importance of providing an environment where all are treated with respect and dignity and has embedded this responsibility into the following policies and processes.



### **Corporate Responsibility**

#### ***Employment Policies***

The employment of all staff (permanent, full-time, part-time, casual) is governed by NH employment policies. These comply with the *Employment Standards Act, 2000 (ESA)* which ensures fair employee treatment and sets minimum standards for workplaces in Ontario regarding minimum wage, hours of work limits, termination of employment, severance pay, vacation and more.

#### ***Employee Code of Conduct***

The Employee Code of Conduct and Mutually Respectful Workplace and Diversity Policy provide overall guidance on workplace conduct and relations. NH staff are expected to treat others equitably, with respect, dignity, understanding and acceptance. Unacceptable behaviours include bullying, harassment, and intimidation. Both policies are compliant with the Ontario Human Rights Code which prohibits discriminatory actions against people based on a protected ground in a protected social area.

#### ***Whistleblower Policy***

NH is committed to the highest standards of business and ethical conduct and values openness and transparency in all matters of business. This policy encourages and enables the reporting of alleged or potential wrongdoings relating to violation of policies, ethical behaviours or business conduct, including those related to the use of forced and/or child labour by NH or supply chain partners. These reports, when made in good faith, ensure without fear of reprisal and ensures protection the confidentiality of those making the report.

## **Strategic Sourcing Due Diligence**

### ***Mandatory Supplier Attestation***

NH Strategic Sourcing and Logistics has introduced a mandatory requirement in all competitive procurement documentation for proponents to attest that their organization in no way involves forced or child labour at any step of the production of goods or services. Proponents must also describe the processes and practices implemented and their organizations that reduces or prevents this risk. A supplier attestation form is now included with procurement documents and requires vendors to attest that their supply chain in no way involves forced or child labour, and to outline the policies and procedures in their organization that reduce this risk.

### ***Revised Standard Contract and RFP terms***

NH standard contract language has been modified to include the following:

*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).*

### ***Partnership with Mohawk Medbuy Corporation***

A large portion of NH's purchasing activity are made using MMC contracts. MMC has confirmed the following:

- Standard contract language has been modified to include provisions against the usage of forced or child labour.
- Competitive procurement templates now include an attestation from suppliers/vendors that their goods/services in no way involve forced or child labour.
- To date, MMC has not been made aware of any instances where forced or child labour exists in current supply chains.

NH has worked closely with Mohawk Medbuy Corporation (MMC) and other hospital organizations to share best practices for addressing forced labour and child labour including policy and training development.

## **III. Risks and Management of Risks**

We have not yet identified any risks.

## **IV. Remediation of Risks**

We have not identified any risks.

## **V. Remediation of Loss of Income to Most Vulnerable Families**

We have not identified any risks.

## **VI. Employee Training and Communications**

- At this time, all employees responsible for contracting and sourcing of products and services within the Strategic Sourcing, Logistics, and Redevelopment Teams have received training on Bill S211 and corporate policies and procedures.
- Bill S-211: Fighting Against Forced Labour and Child Labour in Supply Chains Act Annual Report will be posted on website week of June 3<sup>rd</sup>.

## **VII. Ensuring Effectiveness**

NH Strategic Sourcing and Logistics regularly reviews and audits the organization's policies and procedures related to forced labour and child labour and compliance with legislative requirements.