



# **Report and Attestation on Fighting Against Forced Labour and Child Labour in Supply Chains Act**

Fiscal Year ended March 31, 2024

**Trillium Health Partners**

**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 Trillium Health Partners, (the “Board”)

**FROM:** Karli Farrow  
President & Chief Executive Officer  
Trillium Health Partners

**Date:** May 31, 2024

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

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On behalf of Trillium Health Partners, 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.

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Karli Farrow  
President and Chief Executive Officer  
Trillium Health Partners  
May 31, 2024



[Signature]  
I have the authority to bind Trillium Health Partners

I certify that this attestation has been approved by the Board of Trillium Health Partners on May 31, 2024



[Signature]  
Adam C. Burke  
Board Treasurer  
Trillium Health Partners

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## **Executive Summary**

Trillium Health Partners is a large regional specialized Hospital focused on our mission to build a new kind of health care for a healthier community. As one of Ontario’s largest community based academic hospitals, we are a single system of care for a defined population focused on health, equity and population health. Trillium Health Partners (“THP”) is committed to operating with integrity and high ethical standards, including respecting human rights as outlined in our “Code of Conduct”, “Professional Staff Code of Conduct” and “Respectful Workplace” policies. At THP, we aspire to create a healthy, safe and respectful healing environment that is based on our values of compassion, excellence and courage.

THP employs more than 15,000 employees and as a Hospital and public organization is required to comply with various legislative requirements such as the *Public Hospitals Act*, the *Ontario Human Rights Code* and the *Employment Standards Act, 2000* (“the ESA”).

THP embraces the enactment of Bill S-211: *Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and pledges to comply with its provisions. This annual report, prepared in compliance with section 11 of the Act for the fiscal year ended March 31, 2024, outlines THP’s key activities related to this new legislation.

Recognizing the complexity and evolving nature of combating forced labour and child labour in supply chains, THP acknowledges that compliance with the Act necessitates ongoing and iterative processes within the organization. Therefore, THP commits to continually exploring opportunities to enhance supply chain transparency and to enhance its policies and training programs for its employees.

This report will be available to the public online for viewing and for download on THP public facing website at [Accountability \(THP.ca\)](https://www.trilliumhealthpartners.ca/accountability), and submitted to Public Safety Canada be included in the searchable catalogue on their website.

## **Section 1: Structure, activities and supply chains**

THP is a leading hospital corporation in Ontario and is governed by its skill-based Board of Directors. Comprised of the Credit Valley Hospital, the Mississauga Hospital, and the Queensway Health Centre, Trillium Health Partners serves the growing and diverse populations of Mississauga, West Toronto and surrounding communities and is a teaching hospital affiliated with the University of Toronto. THP offers full range of acute care hospital services, as well as a variety of community-based, specialized programs.

### **Core Activities of THP consist of:**

- **Patient care:** THP provides a wide range of healthcare services, including emergency care, surgeries, diagnostic imaging, rehabilitation, mental health services, and specialized treatments. THP places a strong emphasis on quality assurance throughout the supply chain, conducting rigorous inspections, testing, and monitoring to ensure that products meet safety and efficacy standards. Collaboration with suppliers and stakeholders is key to maintaining high standards of quality and patient safety.
- **Education and research:** As an academic health science center, THP is actively involved in medical education and research, collaborating with academic institutions to advance healthcare knowledge and train future healthcare professionals.
- **Community engagement:** THP is committed to engaging with the community through outreach programs, health promotion initiatives, and partnerships with local organizations to address the health needs of the population.

THP's supply chain encompasses a range of activities and processes from the acquisition of medical supplies and equipment, to the delivery of patient care. The key components of THP's supply chain include:

- **Purchasing and procurement:** Involves sourcing and purchasing medical supplies, equipment, pharmaceuticals, and other necessary items and services for the hospital. THP's sourcing and procurement activities are mostly managed by shared service organizations, mainly by:
  - Shared Services West ("SSW") which integrated with Mohawk Medbuy Corporation, effective April 1<sup>st</sup>, 2024;
  - Mohawk Medbuy Corporation ("MMC") – a reporting entity under the Act;
  - HealthPro group purchasing group – a reporting entity under the Act.

Additionally, THP procures products for its retail pharmacy and gift shops directly.

Majority of THP's required goods and services are procured from within Canada, however depending on the type of products and their availability these could be sourced from abroad. Regardless of the location of the suppliers and whether the goods are sourced locally or through imports, most of the procurement activities of THP, including the identification and qualification of suppliers and products, are managed by shared service sourcing and purchasing groups.

- **Distribution and logistics:** THP's distribution network ensures timely delivery to various internal departments and sites within the organization.

- Production of goods: THP produces a small number of custom-made hand splints at its disability management and rehabilitation services department. The hand splints are created and fitted on-site by the occupation therapists, who are THP employees.
- Sales of goods: THP manages multiple retail pharmacies and gift shops at its sites. Items sold in these locations are purchased from local distributors.

## **Section 2: Policies and due diligence processes**

THP adheres to several provincial and regional legislations, such as the *Ontario Human Rights Code* and the ESA. Furthermore, THP has established internal policies and procedures to ensure that its operations are aligned with best practices and regulatory requirement pertaining to human rights. These commitments are reflected in THP's "Code of Conduct", "Professional Staff Code of Conduct", and "Respectful Workplace" policies.

Guiding legislation and policies are as follows:

- A) The ESA, which protects employees and sets minimum standards for most workplaces in Ontario, including but not limited to minimum wage, hours of work and overtime, public holidays, vacation time and pay, leaves of absence, termination notice and pay.
- B) The *Ontario Human Rights Code*, which prohibits actions that discriminate against people based on a protected ground in a protected social area.
- C) THP Code of Conduct. This policy provides a set of principles, rules and ethical standards to be used as a guide for staff at THP and the day-to-day conduct of hospital operations. This policy is guided by the following principles:
  - Compliance with all relevant laws, regulations and practice standards;
  - Support to THP's vision, mission and core values of compassion, excellence and courage;
  - High standards of business and ethical conduct applied to all matters of hospital operations;
  - Action in good faith and in the best interest of THP based on the standards for accountability, transparency, honesty, integrity and ethical behavior, and focused on quality of patient care;
  - Right of individuals to raise concerns without fear of reprisal.
- D) Professional Staff Code of Conduct. The purpose of this policy is to:
  - Promote respectful interactions at THP and to set out expectations of

- respectful behaviour;
  - Define disruptive behaviour and encourage the prompt identification, remediation and resolution of alleged disruptive behaviour;
  - Promote fairness, transparency, and accountability in the behaviour management and remediation process.
- E) Respectful Workplace. This policy provides the overarching structure to support the THP Respectful Workplace program. It is further supplemented by the THP Declaration of Respect and the THP's Code of Conduct, Workplace Violence Prevention and Respectful Behaviour by Patients, Families and Visitors policies.
- F) In past several years questions about suppliers' Environmental, Social & Governance ("ESG") practices have been incorporated in THP's sourcing documentation, emphasizing the importance of sustainability and responsible business practices. Through these sourcing practices suppliers are requested to describe their organization practices, including managing social matters in the areas of human rights, health and safety, employee relations and engagement, community relations, etc.
- G) Effective January 1, 2024, THP's sourcing and purchasing processes have been further enhanced to align with requirements of the Act. Specifically, a new form has been incorporated in sourcing packages whereby all proponents are to warrant that their goods and services are not the result of, and in no way involve, forced labour or child labour.
- H) Effective January 1, 2024, a new provision was adopted in THP's standard purchase agreement templates, under Supplier's Representations, Warranties, Covenants section, whereby suppliers must confirm that the goods and any services provided by them are not the result of, and in no way involve, forced labour or child labour.
- I) THP acknowledges and complies with the amendment of the Customs Tariff Act which allows for a prohibition of imported goods manufactured or produced, in whole or in part, by forced labour or child labour as defined in the Act.
- J) In addition, THP is working closely with other entities, to develop a policy, exclusively on the Act. This collaboration includes the Ontario Hospital Association, other peer hospitals, our shared service organizations, and legal counsel.

### **Section 3: Risks and management of risks**

THP's supply chain encompasses a range of activities and processes from the acquisition of medical supplies and equipment, to the delivery of patient care. THP has conducted various risk assessments to identify parts of its operations and supply

chains that might carry risk of forced labour or child labor. These include:

- Mapping activities and mapping supply chains;
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains;
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily;
- Requiring suppliers to confirm compliance against the use of forced labour and/or child labour in their activities and supply chains;
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour;
- Engaging with experts and other stakeholders on the issue of addressing forced labour and/or child labour.

As of today, THP has not identified and has not been made aware of any instances where forced labour or child labour exists in its supply chains or activities.

The results of the analysis on key components of THP's supply chain as well as the measures undertaken to manage potential risks are as described further below.

A) Purchasing and procurement:

The majority of THP's sourcing and procurement activities are managed by shared service sourcing and purchasing organizations. Each of these organizations have issued formal letters whereby they confirm their due diligence and compliance with the Act. Per the letters issued, at the time of this report, none of THP's shared services sourcing and purchasing organizations are aware of any instances where forced labour or child labour exists in current supply chains. In addition, all three organizations confirm that they have added new provisions and requirements to the standard sourcing documents and contracts to ensure compliance of suppliers with the Act.

Additionally, an internal assessment of hospital's direct purchases for its retail pharmacies and gift shops was performed. The assessment entailed reviewing the list of all retail vendors and making reasonable inquiries of the staff who are in charge of these purchases.

B) Distribution and logistics:

Distribution and logistics of goods at THP is an internal process, and is managed by hospital's employees, who are protected by various employment and human rights policies, as described in Section 2 of this report.



C) Production of goods:

THP produces small number of custom-made hand splints at its disability management and rehabilitation services department. The hand splints are created and fitted on-site by the occupation therapists, who are all THP employees.

D) Sale of goods:

THP sells goods to public through its retail pharmacy and gift shops. The assessment of the purchasing processes for these areas included review of vendors and making reasonable inquiries of the staff who are in charge of purchases.

As at the date of this report THP has not identified and has not been made aware of any instances where forced labour or child labour exists.

#### **Section 4: Remediation of risks**

We have exercised duty of care and due diligence to assess THP's supply chains and activities and to date we have not identified any areas of risks.

#### **Section 5: Remediation of loss of income to vulnerable families**

We have exercised duty of care and due diligence to assess THP's supply chains and activities and to date we have not identified any areas of risks.

#### **Section 6: Training and communication provided to employees**

A corporate communication to all Hospital leaders to provide awareness broadly with all Hospital staff of the new legislation and the requirements of the Act was shared on May 7<sup>th</sup>, 2024. Additionally, the Hospital is collaborating with the Ontario Hospital Association, peer hospitals, and its shared service organizations to develop a policy and training materials to be shared with staff to ensure ongoing compliance with the requirements of Bill-S211.

#### **Section 7: Assessing effectiveness in ensuring that forced labour and child labour are not used**

The measures of fighting against forced labour and child labour in supply chains are complex and evolving and require ongoing and iterative processes.

THP is committed to continue to conduct supply chain mapping exercises to identify the risk of forced labour and child labour at each stage of its supply chain and to address them, where needed. Close collaboration with other partners to develop respective policies and trainings for THP employees is in progress.

THP's shared services sourcing and purchasing organizations are equally committed to sustain iterative improvements in their activities related to this legislation, including the development of internal policy in their organizations and training for those in sourcing and supply chain roles.

### Documents referenced in this report:

1. Code of Conduct Policy, Trillium Health Partners, version 1.9
2. Professional Staff Code of Conduct Policy, Trillium Health Partners, version 1.4
3. Respectful Workplace Policy, Trillium Health Partners, version 1.4
4. Ontario Human Rights Code, Ontario Human Rights Commission, website: [The Ontario Human Rights Code | Ontario Human Rights Commission \(ohrc.on.ca\)](https://www.ohrc.on.ca/)
5. Employment Standards Act, 2000 (ESA), Government of Ontario, Employment Standards Act, 2000, S.O. 2000, c. 41, website: [Employment Standards Act, 2000, S.O. 2000, c. 41 \(ontario.ca\)](https://www.ontario.ca/government/employment-standards-act-2000)
6. Environmental, Social & Governance, Schedule Q, Master Template Request for Proposal, Shared Services West, v. March 2023
7. Proponent Confirmation Form – RFP Schedule E, Shared Services West
8. Representations, Warranties, Covenants, Master Template Agreement, Shared Services West v.OCT.2022
9. Shared Services West, Bill S211 Compliance Comfort Letter dated March 31, 2024
10. Mohawk Medbuy Corporation, Bill S211 Letter to Members dated April 15, 2024
11. HealthPro, Bill S211 Letter to Members dated April 17, 2024
12. THP Bill S211 Memo to Leaders, dated May 7, 2024