Trillium Health Partners

Statement Against Forced and Child Labour in Supply Chains

Trillium Health Partners

Fiscal Year ended March 31, 2025

Table of Contents

Executive Summary	03
Section 1: Structure, activities and supply chains	04
Section 2: Policies and due diligence processes	06
Section 3: Risks and management of risks	08
Section 4: Remediation of risks	10
Section 5: Remediation of loss of income to vulnerable families resulting from measures taken to eliminate the use of force labour and child labour	10
Section 6: Training and communication provided to employees	10
Section 7: Assessing effectiveness in ensuring that forced labour and child labour are not used	11

Executive Summary

Trillium Health Partners (THP) is one of the largest community-based hospital systems in Canada. Comprised of 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. THP is committed to reducing inequities and improving health in the community.

Trillium Health Partners is committed to operating with integrity and high ethical standards, including respecting human rights in all aspects of our supply chain.

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. More than 17,000 employees, physicians, learners, and volunteers support the delivery of high quality patient care at THP.

THP 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 is committed to comply with its provisions. This annual report, prepared in compliance with section 11 of the Act for the fiscal year ended March 31, 2025, outlines THP's key activities related to this new legislation.

This report will be available to the public online for viewing and for download on THP's public facing website at Accountability (THP.ca), and submitted to Public Safety Canada to be included in the searchable catalogue on their website.

"THP commits to continually exploring opportunities to enhance supply chain transparency and to enhance its policies and training programs for its employees."

Section #1:
Structure, activities and supply chains

THP is governed by a 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 health care 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 health care knowledge and train future health care professionals.

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:
    - 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.

The 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.

"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."

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.

Ethical Sourcing in Healthcare

THP has established internal policies and procedures to ensure that its operations are aligned with best practices and regulatory requirement pertaining to human rights.

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. All employees, professional staff, volunteers, students, and learners, independent and external contract workers, and all individuals who represent THP are bound by this policy. The policy provides a set of principles, rules and ethical standards to be used as a guide in 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 mission and 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.

Trillium Health Partners' Values:

Compassion

Excellence

Courage

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) The importance of environmental sustainability and responsible business practices of suppliers is reflected in THP's sourcing documents, which include specific questions on Environmental, Social and Governance (ESG) practices of prospective providers of goods and services. In response to these questions, suppliers are requested to describe their organizational 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, during current fiscal year, THP added a new provision to it's Sourcing Policy, describing the Act and emphasizing its compliance with and commitment to the Act.

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 below.

A) Purchasing and procurement:

The majority of THP's sourcing and procurement activities are managed by shared service sourcing and purchasing organizations, mainly by MMC. MMC has issued a formal letter 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 two 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.

During the current fiscal year, MMC has undertaken the following steps to maintain strong compliance with the Act:

- Has provided 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.
- Has issued a Supplier Risk Assessment in September 2024 to our top 200 suppliers, and has continued to collect this data, including any EcoVadis or similar third-party risk assessment reports.
- MMC's ESG team has been making preparations to launch a Supplier Code of Conduct in FY25, which will further reinforce MMC's standards and expectations of suppliers (including the elimination of forced labour and child labour).

Transparency and Due Diligence

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.

Additionally, an internal assessment of hospital's direct purchases for 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 the 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 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 all THP employees.

D) Sale of goods:

THP sells goods to the public through its retail pharmacies 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 of 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 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 employees of the new legislation and the requirements of the Act was shared on May 7, 2024.

> **"Compliance with Bill S-211 is not a checkbox—it is a commitment to ethical responsibility that THP takes seriously."**

The majority of THP's sourcing and procurement activities are carried out by MMC, who has provided ESG training (including that specific to Bill S-211) to all relevant employees (including all sourcing staff). This training highlights obligations, RFP, and contract language relevant to Bill S-211, and guides the employees to not allow removal of that language through any negotiations.

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, evolving, and require ongoing and continuous 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.

THP's shared services sourcing and purchasing organizations are equally committed to sustain ongoing and continuous improvements in their activities related to this legislation, including training for those in sourcing and supply chain roles.

"The measures of fighting against forced labour and child labour in supply chains are complex, 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."

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, 2025
REPORTING PERIOD:	April 1, 2024, to March 31, 2025

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.

Karli Farrow
President and Chief Executive Officer
Trillium Health Partners

May 31, 2025

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, 2025

Adam C. Burke
Board Treasurer
Trillium Health Partners

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)
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)
6. Environmental, Social & Governance, Schedule Q, Master Template Request for Proposal, Shared Services West, v. March 2023
7. Proponent Confirmation Form – RFP Schedule E, Mohawk Medbuy Corporation
8. Representations, Warranties, Covenants, Master Template Agreement, Mohawk Medbuy Corporation
9. Mohawk Medbuy Corporation, Bill S211 Letter to Members dated March 7, 2025