



Report on Forced Labour and Child Labour in Canadian Supply Chains – 2025

Reporting entity's legal name: Haliburton Highlands Health Services Corporation

Financial reporting year: April 1, 2024, to March 31, 2025

Identification of a revised report: N/A

Business number: 899105035RR0001

Identification of a joint report: N/A

Identification of reporting obligations in other jurisdictions: N/A

Entity categorization according to the Act: Entity (Hospital)

Sector/industry: Public Sector / Health Care

Location: Haliburton County, Ontario

Organization Overview

Haliburton Highlands Health Services Corporation (HHHS) is a non-share capital entity incorporated in 1996 under the *Ontario Not For Profit Corporations Act* #1165873 and a registered Canadian Charity #1076710-10 governed by a volunteer Board of Directors. HHHS, led by an executive team of a Chief Executive Officer, Chief Nursing Executive, Chief Financial Officer and Chief of Medical Staff manage leaders, staff, volunteers, students and physicians.

HHHS' mandate or objects are to establish and operate a public hospital, ancillary facilities and services, long-term care facilities and other health related services; to promote and participate in education; and to promote and support research activities. HHHS has over 400 employees and 200 volunteers across the two main campuses located in Minden and Haliburton, Ontario.

HHHS delivers high-quality health services to residents, cottagers, and visitors to Haliburton County and the surrounding area. HHHS strives to be leaders in innovative rural health care, and works closely with local and regional partners to promote wellness and provide access to essential health services, including Primary Care, Hospital (Acute Inpatient and Emergency Care at the Haliburton site), Long-Term Care, End-of-Life Care, Mental Health & Addictions Services, and Community Support Services.

HHHS is an integral part of the Kawartha Lakes Haliburton Ontario Health Team. By working co-operatively with other healthcare providers, HHHS can maximize its efficiencies, reduce costs and support the people of the area through education about their health and access to the health services they require within the region.

Structure, Activities and Supply Chains

HHHS conducts procurement activities in accordance with its Procurement Controls and Process policy and Purchasing Code of Ethics policy, as well as relevant directives and trade agreements, including but not limited to:

- Broader Public Sector Procurement Directive

- Canadian Free Trade Agreement
- Canada-European Union Comprehensive Economic and Trade Agreement

Most goods and services purchased by HHHS are from suppliers that are Canadian businesses or businesses with Canadian fulfillment addresses. For the reporting period of April 1, 2024, to March 31, 2025, HHHS did not directly import any goods.

Policies and Due Diligence

HHHS purchases contract management and supply chain management services through Mohawk Medbuy Corporation (MMC), a national, not-for-profit, shared services organization supporting Canadian hospitals and health care providers to drive value, efficiencies, and cost savings on the supplies and services they use. HHHS conducts annual training for the leadership team regarding procurement practices and policy expectations.

All procurements with a total cost of ownership more than \$121,200 are supported by MMC. Procurements below \$121,200 are decentralized, however, HHHS incorporates review processes to ensure compliance with HHHS' schedule of authorities. In cases where policy has not been followed, and the goods have already been received, services rendered, or a contract executed, the procurement specialist uses the opportunity to educate regarding policy requirements to reduce the risk of recurrence.

Where public competitive procurement is required, HHHS engages in fair, open, and transparent processes. HHHS also leverages collaborative procurement opportunities and vendor of record arrangements such as those available through MMC, HealthPro, Silver Group Purchasing or Supply Ontario, to increase efficiencies and achieve economies of scale.

Examples of goods and services procured by HHHS to support operations include but are not limited to:

- Various medical and surgical supplies
- Laboratory supplies
- Food and beverage products
- Various information technology products, services, and electronics
- Housekeeping supplies
- Medical equipment
- Furniture and fixtures
- Maintenance operating supplies and services
- Paper and office supplies
- Patient transportation services
- Waste management services

HHHS' procurement policies are actively being updated to specifically address forced labour or child labour. HHHS commits to continuing the work to update its policies accordingly.

Areas of Risk

Based on a high-level environmental scan of HHHS' supply chain, HHHS is not aware of the use of forced labour or child labour for the goods imported into Canada directly, however, there is potential for gaps in our assessment. Although Canadian businesses or businesses with Canadian addresses form the majority of suppliers for HHHS, there is a potential risk of forced labour and/or child labour further down the supply

chain of our suppliers. At present, we are currently not aware of the use of forced labour or child labour in our supply chain.

Steps taken over last fiscal year to reduce risk of forced and child labour

Our procurement and supply chain providers MMC, HealthPro and Silver Group Purchasing (SGP) have confirmed that they have not been made aware of any instances where forced labour or child labour exists in our current supply chains. To further bolster efforts to ensure forced labour and/or child labour are not within the supply chains of hospitals, effective January 1, 2024, the following changes have been made to procurement practices conducted by MMC, HealthPro and SGP:

- Contract language regarding Representation and Warranties modified to include: 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*).
- Competitive procurement templates (e.g. RFP), specifically the Proponent Confirmation Form, were modified 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*);

MMC has undertaken iterative improvements to the activities relative to this legislation and healthcare supply chains, which includes developing internal policies and training for those in sourcing and supply chain roles. Further details on the work completed and ongoing by MMC is available on their [website](#).

HHHS' Procurement Code of Ethics was last reviewed June 2024, however, this policy will be re-evaluated in the coming year to determine if the scope of application should be revised or broadened to include products or services related to other industries considered at-risk. Additionally, HHHS has a Product Evaluation and Standardization Committee which is responsible for oversight of cost-efficient acquisitions, contract compliance, and standardization opportunities. This committee will review its Terms of Reference to adjust its purview to include contract compliance and organizational effectiveness in ensuring that forced labour and/or child labour is not being used in our supply chain.

HHHS currently does not have a policy or practices in place regarding measures taken to remediate any forced labour or child labour or remediating 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. HHHS has not identified any forced labour or child labour in our activities and supply chain and therefore any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour.

HHHS' current procurement education does not include education on the use of forced labour or child labour, and therefore will endeavour to update in the coming year to include this.

HHHS currently does not have policies and procedures in place to assess our effectiveness in ensuring that forced labour and child labour is not being used in our activities and supply chains. HHHS endeavours to creating policies and procedures in the coming year to address this.

Bill S211, Fighting Against Forced Labour and Child Labour in Supply Chains Act

APPROVAL AND ATTESTATION

From: The Board of Directors (the “Board”) of the Haliburton Highlands Health Services Corporation (the “HSP”)

Date: May 29, 2025

Re: April 1, 2024 – March 31, 2025 (the “Applicable Period”)

In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for Haliburton Highlands Health Services Corporation. Based on our knowledge, and having exercised reasonable diligence, we 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.



Irene Odell, Board Chair

Haliburton Highlands Health Services Corporation