

# **Reporting for the *Fighting Against Forced Labour and Child Labour in Supply Chains Act***

Reporting Period,  
April 1, 2024, to March 31, 2025

## **1. Introduction:**

The Government of Canada introduced Bill S-211, *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“the Act”), on May 3, 2023 which came into force on January 1, 2024. The Act serves to implement Canada’s international commitment to contribute to the fight against forced labour and child labour through an annual reporting obligation on certain government institutions and other entities, and aims to increase industry awareness, transparency and drive businesses to improve practices. The annual report addresses the measures taken by these entities to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains.

Entities and government institutions doing business in Canada have a responsibility to identify and prevent forced and child labour from their operations and supply chains. Unity Health Toronto (“Unity Health Toronto” or “our” or “we”) is considered a Reporting Entity under the Act, and has prepared this report in compliance with the Act, following the guidelines published by Public Safety Canada (“Report”).

This Report is produced for the financial year ending March 31<sup>st</sup> 2025 on the steps we have taken during the previous fiscal year to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, or of goods imported into Canada, by Unity Health Toronto.

## **2. Our Structure, Operations, and Supply Chain**

Unity Health Toronto is one of Canada’s largest Catholic healthcare networks serving Toronto, Ontario and works to advance the health of our patients, clients, residents, and our urban communities, across the full spectrum of care, spanning primary care, secondary community care, tertiary and quaternary care services to post-acute through rehabilitation, palliative care and long-term care, while investing in world-class research, education and innovation. Our shared purpose is rooted in our common mission of providing excellent, compassionate care to all we serve. Given that Unity Health Toronto’s organizations were founded by the Sisters of St. Joseph, all sites of our sites share a commitment to the Sisters’ legacy of caring for the most marginalized or disadvantaged in our communities, who are often among the most complex in terms of healthcare needs.

Unity Health Toronto is a charitable organization comprised of the following amalgamated organizations:

- St. Joseph's Health Centre is a community teaching health centre affiliated with the University of Toronto that has served the communities of west Toronto and beyond for nearly a century.
- St. Michael's Hospital is Catholic teaching and research hospital affiliated with the University of Toronto, and is a hub for care, ranging from primary and secondary care to highly complex tertiary and quaternary care for patients from across the province.
- Providence Healthcare provides rehabilitation, palliative care, long-term care and community programs in Toronto.

Unity Health Toronto regularly procures medical equipment, supplies, and technology as part of delivering patient care, research, and education. We also operate cafeterias, home care stores, gift shops, and outpatient retail pharmacies at our locations, which sell over the counter goods directly to patients and visitors, where we may be purchasing directly from suppliers or distributors. Parts of our operation includes the distribution of free medical products and goods, such as harm reduction materials, to vulnerable populations, as well as the distribution of drugs and devices for the purpose of conducting or participating in clinical trials.

Unity Health Toronto is a designated broader public sector organization subject to the *Broader Public Sector Accountability Act* and the Broader Public Safety (BPS) Directives designed to improve accountability and transparency in the procurement of goods and services. Unity Health Toronto's suppliers are predominately based in Canada, and are required to comply with local, provincial and national guidelines and legislation. Effective January 1, 2024, we are required to adhere to the *Building Ontario Businesses Initiative Act* which mandates public sector entities in Ontario give preference to local businesses when procuring goods and services.

Unity Health Toronto's procurement activities include contracting with a national Group Purchasing Organization ('GPO') used by hospitals and community-based health care facilities for the procurement of medical supplies, pharmaceutical products, medical devices, and other goods. We may also purchase and import goods directly from national or international manufacturers/vendors and distributors with the use of clearing houses to facilitate the cross-border transactions in compliance with provincial and national public sector procurement guidelines.

### **3. Our Framework, Policies and Due Diligence**

Unity Health Toronto is committed to providing a work and learning environment where our core values of Human Dignity, Compassion, Excellence, Community and Inclusivity are embedded in our culture and consistently guide our actions and interactions. While we do not have specific policies which speak to child and forced labour, we continue to adhere to several provincial and regional legislation, such as the *Ontario Human Rights Code* and *Employment Standards Act, 2000*. Forced labour and child labour remain contrary to our Vision, Mission and Values. Unity Health Toronto does not endorse forced or child labour within our organization or those of our suppliers and/or subcontractors with whom we conduct business.

Our Code of Conduct outlines the standards of professional conduct and performance expected by all those who are employed or otherwise engaged formally with Unity Health Toronto. All persons covered by the Code of Conduct are expected to comply with it at all times in the workplace, and are required to report any activity or behaviour that contradicts the Code of Conduct. The Code of Conduct also establishes reporting mechanisms, including an anonymous whistleblower line.

The Ontario BPS Supply Chain Code of Ethics is incorporated into our Procurement Policy to address supply-chain-specific standards of practice. To ensure an ethical, professional and accountable Broader Public Sector supply chain, individuals involved with supply chain activities must act, and be seen to act,

with integrity and professionalism. In particular, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for public money. Honesty, care and due diligence is integral to supply chain activities within and between Broader Public Sector organizations, including Unity Health Toronto, suppliers and other stakeholders.

#### **4. Assessing and Managing Risks of Forced and Child Labour in Our Operations and Supply Chain**

Unity Health Toronto is committed to identifying and reducing the risk of forced and child labour in its operations and supply chain in order to put us in the best position to develop appropriate policies and practices to manage that risk. During this Reporting Period, we have not been made aware of areas of risk of forced or child labour in our supply chain activities.

Unity Health Toronto has continued to incorporate language, introduced during the previous reporting period, in our Supplier Agreements and procurement templates which addresses their compliance with the Act. We have obtained from our GPO, Mohawk Medbuy, an attestation for the current fiscal year on the steps it has undertaken for compliance with the Act. Mohawk Medbuy has not been made aware of any instances where forced labour or child labour exists in current supply chains, but should such instances come to light, it will inform Unity Health Toronto. Furthermore, it has indicated it is making preparations to launch a “Supplier Code of Conduct” in FY25 which will further reinforce Mohawk Medbuy’s standards and expectations of suppliers (including the elimination of forced labour and child labour).

#### **5. Training**

During the Reporting Period Unity Health Toronto did not provide training specific to forced labour and child labour in our supply chains.

All staff must complete annual mandatory corporate training, which includes reviewing and affirming adherence to the Code of Conduct. Unity Health Toronto continues to require all staff to sign a declaration confirming that they understand and will adhere to both the letter and spirit of the Code of Conduct as a condition of employment/engagement.

#### **6. Remediation Measures**

During the Reporting Period Unity Health Toronto has not been made aware of instances of forced and child labour in its operations or supply chains. Nor has it received any reports through its established whistleblowing process on the potential use of forced or child labour. Therefore, we have not taken any remediation efforts, including measures to remediate income loss.

In accordance with our policies, if a situation of non-compliance without our Code of Conduct is identified, Unity Health Toronto will work to develop and implement a corrective plan to improve and remedy the situation. Unity Health Toronto has not determined which remediation measures may be necessary or appropriate.

#### **7. Assessing Our Effectiveness**

Unity Health Toronto is not in a position to accurately determine the effectiveness of our current measures to assess and manage its risk of forced labour or child labour in our supply chains. We have not yet taken action to assess the effectiveness of our actions, and acknowledge this is an ongoing process to address a complex and evolving situation. We will continue to work closely with our peer hospitals, Ontario Hospital Association and our GPO.

ATTESTATION FORM

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

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 on behalf of the governing body of 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 within this report.

Full name NORA AUFREITER  
Title Chair person  
Date April 15/2025  
Signature N Aufreiter

"I have the authority to bind Unity Health Toronto"