



REPORT Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9)

For the fiscal year ending March 31, 2025

**Approved by the Board of Directors on
May 7, 2025**

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Executive Summary

Cambridge Memorial Hospital (“CMH”) is committed to providing exceptional health care to the communities it serves, while striving to create healthier communities, together. CMH is a values-based organization committed to a process of continuous quality improvement. Through the values of Accountability and Respect, CMH is committed to public reporting of performance indicators to promote system-wide benefits and best practices. CMH’s ethical standards are outlined in its Human Rights¹ and Respectful Workplace Program² policies. CMH employs just over 1,700 physicians, midwives and staff, and is required to comply with several statutes, including the Ontario Human Rights Code³ and Employment Standards Act, 2000⁴.

CMH acknowledges and is committed to complying with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“Act”). CMH views the Act as a necessary step forward to combat forced and child labour, and to facilitate and track the work as the years progress. This annual report is CMH’s second report under this legislation and is prepared in compliance with Section 11 of the Act for the financial reporting year of April 1, 2024 to March 31, 2025. It outlines CMH’s work completed in relation to this legislation.

CMH recognizes the continuous work required to help prevent forced and child labour in supply chains. Through annual reporting, CMH commits to ongoing updates to develop adequate policies and provide training programs for staff who will work to ensure CMH’s supply chain is free of forced or child labour.

CMH’s annual report will be available to the public online for viewing and download at: www.cmh.org

Section 11 Response

During the 2024-2025 fiscal year, CMH continued to leverage most of its contracts through Mohawk Medbuy Corporation (MMC) for consumables, services and capital equipment. MMC provided Environmental, Social and Governance (ESG) training to all relevant employees. MMC also issued a supplier risk assessment in September 2024 to its top 200 vendors. MMC continued to collect this data along with any third-party risk assessment reports. CMH updated its procurement templates and questionnaires to include modern slavery language. CMH also updated its standard contract language to include modern slavery language. CMH is not currently aware of any instances of forced or child labour being used in the minority of contracts that are sourced outside of MMC. Moreover, MMC and CMH have not been made aware of any instances where forced labour or child labour exist in current supply chains. Should any issues be identified, CMH will investigate accordingly. CMH joined MMC's ESG Committee and will continue to work with MMC as their process develops to ensure the response from the healthcare industry remains cohesive.

Section 1: Structure, Activities and Supply Chains

CMH is an acute care hospital corporation based in Cambridge, Ontario and is governed by a Board of Directors. With an employee count of 1,720 physicians and employees, CMH services the growing and diverse populations of Cambridge, North Dumfries and the Region of Waterloo, and is a teaching hospital affiliated with McMaster University. CMH operates from its Cambridge, Ontario location and does not have any additional sites. A separately incorporated corporation not controlled by the hospital operates a gift shop on the hospital's premises and at times provides donations to the hospital through its proceeds. CMH also leases spaces to third-party entities for the provision of food services and clinical services. CMH sells medical supplies to patients for a fee where they are not otherwise funded by the provincial health insurance plan ("OHIP"). Examples include but are not limited to orthopedic supplies such as casts and braces and premium cataract lenses.

CMH is a member of a shared service organization, MMC, which negotiates capital, consumable and service contracts on behalf of CMH. Most procurement activities at CMH are awarded to vendors who participate in a competitive process and are qualified by, and managed through, the initiatives run by MMC. CMH also utilizes other shared service organizations including Health Pro Canada, Ontario Education Collaborative Marketplace, Ministry of Ontario – Vendor of Records Arrangements and Kinetic GPO. Most of the goods procured by CMH in the last year have been procured from the Canadian market and delivered by a network of local distribution sites. Due to the specific needs of the

medical community, some items are unable to be sourced locally and are therefore procured from international sources in accordance with Ontario's Broader Public Sector Procurement Directive and related policies.

MMC and CMH are not aware of any instances where forced labour or child labour exist within our supply chain. CMH is committed to monitoring this matter and will make reports if applicable.

Section 2: Policies and Due Diligence Processes

CMH belongs to MMC who facilitate most of the contracts it leverages. MMC attested to issuing a supplier risk assessment survey in September of 2024 to its top 200 vendors as well as requesting third-party risk assessment reports (see letter from MMC to members, March 7, 2025)⁵. CMH updated its standard contract language and competitive procurement templates as well as questionnaires, to include language that supports the reduction of forced and child labour. MMC and CMH have not been made aware of any instances where forced labour or child labour exist within the current supply chain. CMH is committed to its obligations mandated by the government, such as Ontario Human Rights Code³ and Employment standards Act⁴ and is guided by its corporate policies on Health & Safety, Human Rights Policy, Whistleblower Policy, Abuse – Child and Duty to Report, and Respectful Workplace Program. CMH does not currently have a specific policy on forced labour or child labour in direct relation to the supply chain but is committed to reviewing its policies and practices.

Section 3: Forced Labour and Child Labour Risks

CMH acknowledges that procurement and supply chains can carry risk of forced labour or child labour in a direct or indirect way. CMH has not directly begun work to identify parts of its supply chain or activities that carry a risk of forced labour or child labour outside of the work completed by MMC. CMH joined MMC's ESG Committee to ensure it is up to date with best practices on modern slavery. As mentioned previously in the report, CMH leverages contracts set up through MMC, which has confirmed its due diligence and compliance with the Act⁵. MMC sent out a supplier risk assessment in September of 2024 and is currently conducting a review with the vendor community to identify what risks could potentially be in the supply chain. CMH updated its procurement templates, questionnaires and contract templates to obtain a commitment to combat modern slavery from the vendor community with any new contract signed. CMH and MMC have not currently been made aware of any instances where forced labour or child labour exists in the supply chain.

Section 4: Remediation Measures

CMH is committed to meeting its standard obligations set forth by the provincial and federal governments. CMH and MMC have not been made aware of any instances of forced or child labour within the supply chain. Accordingly, CMH has not taken any direct measures of remediation work aimed to counteract or address any human rights harms that may have occurred within the supply chain.

Section 5: Remediation of Loss of Income

CMH and MMC have not been made aware of any instances of forced or child labour within the supply chain. Accordingly, CMH has not taken any measures to combat or eliminate forced labour or child labour, nor has it taken measures to remediate loss of income.

Section 6: Training

To date, all CMH supply chain staff have watched MMC's ESG training video on modern slavery. CMH joined MMC's ESG Committee and is committed to keeping up with best practices on this subject.

Section 7: Assessing Effectiveness

CMH understands that fighting against forced labour and child labour requires a continuous review of the ever-evolving supply chain. CMH is committed to ongoing reviews, when required, regarding its supply chain policies and to working collaboratively with MMC to reduce the risk of the use of forced labour and child labour in the supply chain. CMH is awaiting the completion of MMC's vendor survey and third-party assessment to review what is applicable to CMH's own supply chain. CMH joined MMC's dedicated ESG Committee to remain up to date on any current progress being made in the healthcare sector.

Attestation

Reporting Entity's Legal Name: Cambridge Memorial Hospital

Reporting Year: April 1, 2024 to March 31, 2025

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 the entity listed above. 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.

We further attest that the Board of Directors of Cambridge Memorial Hospital has reviewed and approved this report.

We have the authority to bind Cambridge Memorial Hospital

Date: May 7, 2025

Signed Lynn Woeller

Director and Chair of the Board of Directors

Signed Patrick Gaskin

President & CEO, Cambridge Memorial Hospital and Secretary, Board of Directors

References

1. Human Rights Policy – available upon request
2. Respectful Workplace Program – available upon request
3. Ontario Human Rights Code, Ontario Human Rights Commission,

[The Ontario Human Rights Code | Ontario Human Rights Commission \(ohrc.on.ca\)](https://www.ohrc.on.ca/)

4. Employment Standards Act, 2000 (ESA), Government of Ontario, Employment Standards Act, 2000, S.O. 2000, c. 41,

[Employment Standards Act, 2000, S.O. 2000, c. 41 \(ontario.ca\)](https://www.ontario.ca/laws/statutes/00e/00e041.pdf)

5. MMC Reporting for the Fighting Against Forced Labour and Child Labour in Supply Chains Act letter – dated March 7, 2025

End of Report