

Fighting Against Forced Labour and Child Labour in Supply Chains Act

Preamble

The Queensway Carleton Hospital (the “Hospital”) takes seriously its responsibility as a larger organization with a significant supply chain. It speaks to the hospital’s core values: Collaboration, Accountability, Innovation and Respect. The Hospital continuously works hard to ensure it achieves the best value for the use of public funds, while mitigating the risk of shortages, and ensuring the ethical sourcing of goods and materials. The Hospital is committed to fair, competitive and transparent procurement practices.

The Queensway Carleton Hospital has created a report to outline the measures it has taken to address forced labour and child labour in its supply chains. This report is for the Hospital’s previous financial year which ended March 31, 2025, and has been uploaded onto the Public Safety Canada’s website. The Hospital will continue to work with its supply chain partners to fight against forced labour and child labour, as well as build socially responsible procurement practices and policies.

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Fighting Against Forced Labour and Child Labour in Supply Chains Act

Introduction

Queensway Carleton Hospital (the “Hospital”) has determined itself to be a Reporting Entity as outlined in Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). The Hospital is classified as an entity because the organization meets the following criteria:

- Canadian business presence
 - Has a place of business in Canada;
 - Does business in Canada; and
 - Has assets in Canada.
- Size-related threshold
 - Has at least \$20 million in assets for at least one of its two most recent financial years;
 - Has generated at least \$40 million in revenue for at least one of its two most recent financial years; and
 - Employs an average of at least 250 employees for at least one of its two most recent financial years.

The Hospital is classified as a Reporting Entity because it meets the following criteria:

- Sells goods in Canada; and
- Imports goods into Canada that are produced outside of Canada.

Queensway Carleton Hospital is a corporation that conducts its business in Ottawa, Ontario, Canada, is in the healthcare and social assistance industry, and its business number is 107868770 RT0001. The Hospital is completing this Report for only itself, and is not representing any other Entity.

This report will be covering the fiscal year of 2024-2025 (April 1, 2024 to March 31, 2025). It will only include measures and steps taken by the organization during this timeframe. This is the first and final version of this Report.

Organizational Background *(its structure, activities, and supply chains)*

Queensway Carleton Hospital is a provincially funded, not-for-profit organization located in the City of Ottawa. The Hospital is a registered charity under the Income Tax Act. The Hospital is a patient and family-centered, urban community hospital where the patient and their family come first.

The Hospital’s dedicated employees serve a community that is ever-changing and a population that is ever-growing. With a catchment area of more than 500,000 residents, the Hospital is currently undergoing expansions and renovations to ensure it is able to meet the needs of the community.



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Queensway Carleton Hospital is committed to providing high quality patient care through each of its cornerstone programs, designed to meet the health care needs of the people that live, work, and play in the region. Employing over 2,700 health care professionals with an operating budget of over \$275 million, this 355-bed facility is also the secondary referral centre for the Ottawa Valley, providing primary and secondary services in a variety of inpatient and outpatient settings. The Hospital's cornerstone programs include Emergency, Medicine, Surgery, Critical Care, Childbirth, Mental Health, Acute Rehabilitation, and Geriatric Care.

Queensway Carleton Hospital must adhere to the Ontario Broader Public Sector Procurement Directives, The Canadian Free Trade Agreement, the Canadian Economic Trade Agreement, and the Canada-US-Mexico Agreement. The Hospital procures goods, and services independently as well as through Group Purchasing Organizations (GPO) and Shared Services Organizations (SSO).

Prevention Efforts *(the steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods produced, purchased, or distributed by the government institution)*

Since the implementation of the Act, Queensway Carleton Hospital has required its suppliers to attest to adhering to the Act when submitting bids to its publicly posted tenders, such as RFP, RFT, RFS, RFQ, etc. The Hospital has collected and monitored its suppliers to ensure compliance with the Act. The Hospital has not only collected supply chain data for suppliers that are classified as "Reporting Entities", but also for all suppliers providing goods and services to the organization. All Group Purchasing Organizations (GPOs) and Shared Service Organizations (SSOs) of which the Hospital affiliates, are also complying with the Act's requirements for their sourcing and procurement activities.

The Hospital has been reviewing supply chain ethics commitments made by suppliers, to ensure their supply chains are free of forced labour and child labour. This review will continue into the next fiscal year and thereafter to ensure that the hospital's suppliers meet their requirements with respect to forced labour and child labour. The hospital has updated and enforced agreement clauses outlining the necessity of the Act and requires reporting from suppliers on the steps they are taking to ensure their supply chains are free of forced labour and child labour. The Hospital requires all new contracts to contain attestations from suppliers stating they are in compliance with the Act. The Hospital also requires all suppliers to complete an attestation form outlining to the Hospital that their supply chains are free of forced labour and child labour and are in compliance with the requirements of the Act.

For the 2025-2026 fiscal year, the Hospital will continue to work with its suppliers to ensure ongoing compliance with the Act, and understand the steps they are taking to guarantee their supply chains are free of forced and child labour.

Policies and Due Diligences *(its policies and due diligence processes in relation to forced labour and child labour)*



Policies and due diligences were put in place for the 2024-2025 fiscal year, and will continue into future fiscal years. The Hospital has updated its procurement policy and requires all publicly posted tenders to stipulate that suppliers must report on their forced labour and child labour policies, and articulate if their supply chains are at risk of propagating forced labour or child labour. All suppliers that conduct business with the Hospital are required to comply with the Act, and attest to having supply chains that are free of forced and child labour.

Risk Assessment *(the parts of its activities and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk)*

Queensway Carleton Hospital has a process in place to identify risks, and this work is on-going. To date, no gaps or specific risks have been identified. As the Hospital continues to work on identifying risks of forced labour and child labour in supply chains, it will work to determine the best way to manage and mitigate those risks if identified.

As the Hospital operates in Ontario, there are no risks of forced or child labour within the organization, however there are risks of forced labour and child labour with the suppliers that partner with the Hospital. The Hospital is working diligently to identify suppliers that have risks of forced labour and child labour in their supply chains, and will eliminate future use of their products or services while also being cognizant of any economic hardship that could ensue.

Remediation Action *(any measures taken to remediate any forced labour or child labour)*

Queensway Carleton Hospital has not identified any supplier that has the risk of forced labour or child labour. Due to the lack of findings, the Hospital has not taken any remediation actions to eliminate forced labour or child labour within its organization. The Hospital will stay vigilant and continuously monitor for any forced labour and child labour within its supply chain partnerships.

Mitigating Income Loss *(any measures taken to remediate 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)*

Queensway Carleton Hospital has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our supply chain activities. The Hospital will continue to diligently review and assess the potential of income loss, and ensure our supply chain partners are taking immediate action to remediate the situation.

Employee Training *(the training provided to employees on forced labour and child labour)*

Queensway Carleton Hospital has provided mandatory training for its procurement department employees. Each employee is knowledgeable about the Act and its requirements. This training was developed and delivered



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internally by the Hospital. The employees are aware of the supplier attestation within the organization's tendering documents and contracts, and understand the importance of removing forced labour and child labour from supply chains.

An Information session about the Act and the Hospital's obligations under the Act has been provided to the Hospital's management, and senior leadership teams.

Effectiveness Evaluation *(how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains)*

Queensway Carleton Hospital has put in place vendor attestation requirements for all its tender documents and contracts. Each attestation is reviewed, and it is documented if there are forced or child labour instances or risks in their supply chains. Since the beginning of this process, there has not been any documented instances of forced and child labour in its supplier partners' supply chain activities. If the Hospital is made aware of any forced or child labour with its supply chain partners, immediate remedial action will be taken.

The Hospital will continue to monitor and engage with its supply chain partners to understand the impact our actions are having on the reduction of forced labour and child labour in our supply chains.

Documentation

The Hospital keeps thorough and proper records to support the claims made throughout this Report.

Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of [title], attest that I have reviewed the information contained in the report on behalf of the governing body of the entity [or entities] 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.

Chad Schella
Chad Schella (Apr 29, 2025 12:31 EDT)

Date: 04/29/2025

Chad Schella
Board Chair

I have the authority to bind the Queensway Carleton Hospital.