

Bill S-211: Fighting Against Forced Labour and Child Labour in Supply Chains Act

Bruyère Health, under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"), must complete and submit a report to Public Safety Canada as it imports goods into Canada that are produced outside of Canada.

Bruyère is classified a Reporting Entity as per the following categorizations:

- 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 completing this Report for only itself and is not representing any other Entity. Bruyère Health is a corporation that conducts its business in Ottawa, Ontario, Canada, is in the healthcare industry, and its business number is 87274 0766.

This report is covering the fiscal year of 2024-2025 and only includes 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)*

Bruyère Health was incorporated in April 1996 under the Corporations Act of Ontario and is a registered charity under the Income Tax Act. Bruyère is deemed to be a government not-for-profit organization under the Canadian public sector accounting standards.

Bruyère Health consists of Saint-Vincent Hospital, Élisabeth Bruyère Hospital and Greystone Village, which constitute the Bruyère Hospitals, the Saint-Louis Long-Term Care and the Élisabeth Bruyère Long-Term Care which constitute the Long-term Care Homes, Community Support Services, Bruyère Health Village and Bruyère Health Academic Family Medicine. Bruyère is an academic health care organization committed to providing compassionate and holistic care, respecting the dignity and diversity of all. As a Catholic organization, we are inspired by the values and legacy of [Mother Élisabeth Bruyère](#). Our services in aging and rehabilitation, medically complex, palliative, residential and primary care respond to your needs throughout your life. Employing over 2,300 employees; an operating budget of over \$255 million; over 878 beds and 227 of independent and assisted living units.

Bruyère 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)*

Steps taken to prevent and reduce forced labour and child labour risks:

- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour.
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour.
- Engaging with other regional entities to discuss child labor and/or forced labor to establish how the organization could improve its procurement practices.
- Update our Procurement policy to reduce the risk of outsourcing goods and services to a foreign supplier that might use child or forced labour sources

All Group Purchasing Organizations (GPOs) and Shared Service Organizations (SSOs) of which Bruyère affiliates, are all complying with the Act's requirements for their sourcing and procurement activities. Bruyère purchases the majority of its products through GPO such as HealthPro and MohawkMedbuy;

In 2024/2025 fiscal year, the hospital implemented a process to request attestations from current and new suppliers/service providers. Bruyère has also provided training for its procurement department employees.

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

Bruyère complies with all applicable labor laws and regulations, including those relating to child labor and forced labor.

As of the end of the 2024-2025 fiscal year, Bruyère has modify his Procurement policy to include direction on Fighting Against Forced Labour and Child Labour. Bruyère has implemented due diligence processes for all publicly posted tenders to stipulate that suppliers must attest on their forced labour and child labour policies, and articulate if their supply chains are at risk of propagating forced labour or child labour.

Our procurement policy also states that all procurement activities must be Compliance with Laws and Regulations: We use ethical business practices in compliance with and informed by relevant laws, regulations, directives, including the Ontario Broader Public Sector Supply Chain Code of Ethics, and Bruyère codes of conduct and conflict of interest policies. Bruyère is accountable for the results of its procurement decisions, appropriateness of the processes followed, and maintenance of appropriate documentation to provide evidence of such compliance.

As mandated by Ontario Supply, Bruyère fully comply with The Building Ontario Businesses Initiative (BOBI) Act. By promoting Ontario suppliers, we are reducing the risk of outsourcing goods and services to a foreign supplier

that might use child or forced labour sources in its direct or indirect resources. A due diligence process has been used to select suppliers.

Bruyère complies with all applicable labor laws and regulations, including those relating to child labor and forced labor.

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)*

Bruyère, in collaboration with Group Purchase Organization (CHSS, Healthpro, Mohawk Medbuy), OHA and Ontario Buy work constantly to identify risks associated with forced labour and child labour in its activities and supply chains but has not identified any specific risks or taken any remediation measures.

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 will attempt to identify suppliers that have risks of forced labour and child labour and will make every effort to eliminate future use of their products or services.

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

Bruyère 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)*

Bruyère 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)*

Bruyère has provided training to all Procurement employees on forced labour and/or child labour and has updated his policies and procedures to assess its effectiveness in ensuring that forced labour and child labour are not being used in its supply chain activities.

Furthermore, Bruyère has a mandatory training course for all employees on Equity, Diversity and Inclusion to build an environment that is equitable, inclusive and reflective of our community at every level of our organization.

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

Bruyère has implemented reports to assess the effectiveness of its efforts to ensure forced labour and child labour are not being used in its supply chain activities.

Documentation

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

Attestation

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 for 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 above.



Date: May 22, 2025

Erin Crowe
Chair of the Board of Directors
Bruyère Health
I have the authority to bind the organization

MOTION TO RECOMMEND TO THE BOARD OF DIRECTORS THE APPROVAL OF THE COMPLIANCE REPORT PURSUANT TO BILL S-211 CANADA'S FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

WHEREAS the Bill S-211: Fighting Against Forced Labour and Child Labour in Supply Chains Act came into force January 1, 2024;

WHEREAS Bill S-211 mandates businesses in Canada, specifically those meeting certain criteria such as importing goods into Canada that are produced outside of Canada, having significant assets and revenue or employee count, to annually report their efforts to prevent forced and child labour in their supply chains;

WHEREAS pursuant to the Act every entity must, on or before May 31 of each year, a Board approved report to the Minister on the steps 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 in Canada or elsewhere by the entity or of goods imported into Canada by the entity;

WHEREAS the Procurement's management of Bruyère prepared and provided Bill S-211 compliance report, which was reviewed by Management, for the period of April 1, 2024 to March 31, 2025;

WHEREAS at its meeting held on May 5, 2025, ARMC received all supporting documentation as to the compliance report provided by Management; and

WHEREAS ARMC members reviewed the report and the elements of the Act and their questions were answered to their satisfaction.

BE IT RESOLVED THAT:

The Board of Directors of Bruyère Health authorizes the Chair to sign the compliance report as presented by Management and as required by Fighting Against Forced Labour and Child Labour in Supply Chains Act for the period of April 1, 2024 to March 31, 2025.

MOVED BY: Dr. A. Abdulla

SECONDED BY: D. Brook

CARRIED.

MOTION #866-2025-05-22