



## **Reporting for the Bill S-211: Fighting Against Forced Labour and Child Labour in Supply Chains Act**

Financial period:

FY 2025-26 (April 1, 2025, to March 31, 2026)

**The Religious Hospitallers of St. Joseph of the Hotel Dieu of St. Catharines**

**Carrying on Business as "Hotel Dieu Shaver Health and Rehabilitation Centre"**



### Attestation Form

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

**TO:** The Board of Trustees of Hotel Dieu Shaver Health and Rehabilitation Centre (the "Board")

**FROM:** David Ceglie  
Chief Executive Officer  
Hotel Dieu Shaver Health and Rehabilitation Centre

**Date:** May 12, 2026

**RE:** April 1, 2025, to March 31, 2026 ("the Applicable Period")

---

On behalf of Hotel Dieu Shaver Health and Rehabilitation Centre (the Hospital) I attest that I have reviewed the information contained in the report for 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 above.

I have the authority to bind Hotel Dieu Shaver Health and Rehabilitation Centre.

Dated at St. Catharines, Ontario this 13<sup>th</sup> day of May, 2026.



---

**David Ceglie**  
**Chief Executive Officer**  
**Hotel Dieu Shaver Health and Rehabilitation Centre**

I certify that this attestation has been approved by the Board of Trustees of Hotel Dieu Shaver Health and Rehabilitation Centre on the 12<sup>th</sup> day of May, 2026.

---

**Ms. Betty-Lou Souter**  
**Chair of the Board**  
**Hotel Dieu Shaver Health and Rehabilitation Centre**



## Table of Contents

- Executive Summary
- Section 1: Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour
- Section 2: Questionnaire Response



## **Executive Summary**

Hotel Dieu Shaver Health and Rehabilitation Centre (“HDS”) is a 134-bed rehabilitation and complex care hospital located in St. Catharines, Ontario. As the only rehabilitation hospital serving the Niagara Region’s over 500,000 residents, HDS specializes in rehabilitation, complex care, and end-of-life care. HDS is the sole hospital provider of dedicated rehabilitation services to residents throughout the Niagara Region.

Each year, the hospital admits approximately 1,100 inpatients and receives over 30,000 outpatient visits. HDS plays a critical role in addressing hallway healthcare by alleviating pressures on acute care beds, reducing emergency department visits and acute care readmissions, and minimizing alternate level of care (ALC) designations. Often, HDS helps delay or prevent admissions to long-term care and other facilities, ensuring patients receive appropriate care closer to home.

As such, HDS is committed to operating with integrity and high ethical standards, including respecting human rights.

In support of the passage of Bill S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act, (the “Act”), HDS stands committed to complying and enforcing the Act at every level of its supply chain.

HDS understands that continuous and iterative processes within the organization are necessary to comply with the Act due to the complexity and dynamic nature of the fight against child labour and forced labour in supply chains.

## **Section 1: Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour**

Hotel Dieu Shaver Health and Rehabilitation Centre (“HDS”) is committed to preventing and reducing the risk of forced labour and child labour and has taken the following measures during the reporting period.

- ***Modifying competitive procurement templates (e.g. RFP) to include attestations from any proposed suppliers***

In partnership with our Group Purchasing Organization (GPO), Mohawk Medbuy Services, competitive procurement templates (e.g. RFP) have been modified to include language that suppliers/vendors bidding for Hospital business warrant that the goods and services that the proponent is proposing to provide to the Hospital are not the result of, and in no way involve, forced labour or child labour.

- ***Developing and implementing anti-forced labour and/or child labour contractual clause***

In partnership with our Group Purchasing Organization, HDS standard contract language has been modified to include the following:

*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 Chains Act).*

- ***Engaging with supply chain partners on the issue of addressing forced labour and/or child labour***

HDS is engaging with our Group Purchasing Organization and other hospital organizations to share best practices for addressing forced labour and child labour including information on policy modification and training development.

## Section 2: Questionnaire Response

The following information uses the Minister's online questionnaire as the template for the report.

Questionnaire is located on the Government of Canada, Public Safety Canada website here:  
<https://www.publicsafety.gc.ca/cnt/cntrng-crm/frcd-lbr-cndn-spply-chns/sbmt-rprt-en.aspx#a1>

Identifying Information		
Q#	Question	HDS Response
1	This report is for which of the following?	Entity
2	Legal name of reporting entity	The Religious Hospitallers of St. Joseph of the Hotel Dieu of St. Catharines
3	Financial reporting year	FY 2025-26 (April 1, 2025 - March 31, 2026)
4	Is this a revised version of a report already submitted this reporting year?	No
5	For entities only: Business number(s) (if applicable)	878969971 RT0001
6	For entities only: Is this a joint report?	No
7	For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?	No
8	For entities only: Which of the following categorizations applies to the entity? Select all that apply.	<p>Canadian business presence (select all that apply):</p> <ul style="list-style-type: none"> <li>• Has a place of business in Canada</li> <li>• Does business in Canada</li> <li>• Has assets in Canada</li> </ul> <p>Meets size-related thresholds (select all that apply):</p> <ul style="list-style-type: none"> <li>• Has at least \$20 million in assets for at least one of its two most recent financial years</li> <li>• Employs an average of at least 250 employees for at least one of its two most recent financial years</li> </ul>
9	For entities only: Which of the following sectors or industries does the entity operate in? Select all that apply.	Health care and social assistance
10	For entities only: In which country is the entity headquartered or principally located?	Canada
10.1	If in Canada: In which province or territory is the entity headquartered or principally located?	Ontario
11	For government institutions only: Is this a report for a federal Crown corporation or a subsidiary of a federal Crown corporation?	N/A

Annual Report: Reporting for Entities		
Q#	Question	HDS Response
1	What steps has the entity taken in the 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? Select all that apply.	<ul style="list-style-type: none"> <li>Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains</li> </ul>
2	Please provide additional information describing the steps taken (if applicable)	HDS has developed an Attestation form that must be completed by any Proponent wishing to provide goods or services to the Hotel Dieu Shaver. The Attestation requires confirmation that the Proponent in no way involves forced or child labour at any step of the production of good or services and that the Proponent has processes and practices implemented that reduce or prevent the risk of forced and child labour. Further, the Proponent is required to identify what those process and practices involve.
3	Which of the following accurately describes the entity's structure?	Corporation
4	Which of the following accurately describes the entity's activities? Select all that apply.	<ul style="list-style-type: none"> <li>Importing into Canada goods produced outside Canada</li> </ul>
5	Please provide additional information on the entity's structure, activities and supply chains	<p>HDS purchases medical supplies and equipment to provide healthcare to patients as well as goods and services required to support the infrastructure and back-office functions.</p> <p>HDS purchases directly from suppliers, distributors and manufacturers that are licensed to sell goods and services in Canada. Our supply chains include subcontractors and third parties to our direct suppliers.</p> <p>HDS is the importer of record for the goods we purchase outside of Canada and therefore, need to comply with the Customs Act.</p> <p>HDS is a member of a group purchasing organization (GPO), Mohawk Medbuy Corporation (MMC) and leverages regional</p>

		<p>and provincial contracts.</p> <p>Our GPO partner has taken the following steps to mitigate the risk of forced and child labour in our supply chains:</p> <ul style="list-style-type: none"> <li>i. Modified standard contract language  “Representation and Warranties” section:  “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 Chains Act).</li> <li>ii. Modified competitive procurement templates to include language 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 Against Forced Labour and Child Labour in Supply Chains Act).</li> <li>iii. If the GPO is made aware of any instances where forced labour or child labour exists in supply chains, they will inform HDS.</li> <li>iv. Pursue the development or modification of internal policy and training for those employees in sourcing and supply chain roles.</li> </ul>
6	Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?	Yes
7	Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?	Embedding responsible business conduct into policies and management systems
8	Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?	No
9	Has the entity identified forced labour or child labour risks in its activities and	We have not identified forced labour or child labour risks related to any of the above

	supply chains related to any of the following sectors and industries?	mentioned aspects.
10	Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable)	Not applicable
11	Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?	Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.
12	Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable)	Not applicable
13	Has the entity taken any measures 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?	Not applicable, we have 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 activities and supply chains.
14	Please provide additional information on any measures the entity has 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 (if applicable)	Not applicable
15	Does the entity currently provide training to employees on forced labour and/or child labour?	No
16	Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable).	Not applicable
17	Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?	Yes
17.1	If yes, what method does the entity use to assess its effectiveness? Select all that apply.	<ul style="list-style-type: none"> <li>Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour</li> </ul>
18	Please provide additional information on how the entity assesses its	The HDS Procurement and Supply Chain Policies are reviewed regularly to

	effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable).	ensure compliance with all legislative acts and requirements.
--	---	---

March 2, 2026

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

Dear Member,

We provide this letter in connection with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) for the financial year April 1, 2025, to March 31, 2026 (the “Reporting Period”).

In providing this letter, we have exercised care and diligence that would reasonably be expected of a Chief Operating Officer and a Chief Marketing Officer and Senior Vice President - Strategy, in these circumstances.

The following steps have been undertaken by Mohawk Medbuy Corporation (MMC) during the Reporting Period to prevent and reduce the risk of forced labour or child labour being used within our supply chain, which may be included for completeness in legislative reporting by the hospital for compliance with the Act. This information will form part of MMC’s report once approved by the MMC Board of Directors.

### Structure, Activities and Supply Chains

Mohawk Medbuy is a national, not-for-profit, shared services organization that supports hundreds of health care providers across Canada, as well as child welfare agencies and other public sector organizations. MMC provides value-driven contracting and procurement solutions for medical/surgical supplies, pharmaceutical products, local sourcing, capital (equipment, furniture, fixtures), redevelopment services, and nutrition solutions. Other services include data analytics, in-hospital support, warehousing and logistics, technology, procure-to-pay and accounts payable. The warehousing services are delivered through wholly owned subsidiary, Hospital Logistics Inc., that services hospitals in southern Ontario.

Mohawk Medbuy sources over 300,000 items utilized by health care providers and other public sector organizations. Most suppliers of these products are large multinational corporations with a Canadian presence that may produce or source globally.

### Policies and Due Diligence Processes

#### Contractual Framework

Mohawk Medbuy includes standard contract language within the Representations and Warranties section of our Supplier Agreements that prohibits the use of forced and/or child labour:

*“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., RFPs) include language requiring suppliers bidding for hospital business to attest that they do not use forced labour or child labour.

*“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).”*

### **Supplier Due Diligence During the Sourcing Process**

Many of the suppliers that respond to Mohawk Medbuy procurements have a long history of working with our organization. When new suppliers respond, Mohawk Medbuy thoroughly reviews their responses to the attestation and Agreement redlining to ensure that they’re compliant with the Act. If Mohawk Medbuy is advised of any suspicious activity on this front, it is thoroughly investigated. If a supplier is found to not be adhering to the law, they will be eliminated from the procurement and any future procurements until such time that they can demonstrate compliance.

### **Supplier Engagement**

MMC engages suppliers through annual business reviews and ad hoc communications to share our Environmental, Social and Governance (ESG) supply chain risk management efforts, including ESG risk assessments, and their compliance activities under the Act.

### **Formal Grievance Mechanism**

Mohawk Medbuy is committed to supporting the highest standard of ethics in our business practices. Employees, contractors and suppliers must report any suspected irregularity as early as possible. MMC’s third-party Whistle Blower Reporting Line operates 24 hours a day, seven days a week, 365 days a year. It is provided by a confidential and anonymous external service to which employees and other third parties (e.g., contractors and suppliers) may make a good faith report about suspected irregularities. The Whistle Blower Reporting Line can be accessed by MMC through our website.

### **Supplier ESG Risk Management**

Mohawk Medbuy conducted a **Supplier ESG Risk Assessment** for the Reporting Period, which included 34 suppliers (representing approximately 70% of MMC’s total contracted spend). As part of the Assessment, we reviewed supplier disclosures on unethical labour practices, environmental violations, overall regulatory compliance, as well as supply chain risk management practices and associated documentation. From the suppliers in our sampling, there were no reported violations under the Act (in accordance with their Modern Slavery report submission to Public Safety Canada). MMC intends to expand our Supplier ESG Assessment next fiscal to cover 90% of contract spend.

### **Supplier Standards**

A “MMC Supplier Standards” document (Supplier Code of Conduct) has been developed to further reinforce the expectations and obligations of suppliers in meeting ethical, social, environmental and governance requirements, including the elimination of forced labour and child labour.

MMC’s Supplier Standards are planned for implementation in 2026 and are currently undergoing legal review prior to rollout. The implementation will follow a phased approach, beginning with MMC’s top suppliers.





## Supplier ESG Maturity Assessment

Delivered in the form of a supplier survey, a Supplier ESG Maturity Assessment will be implemented in the next financial year. It will be rolled out to top suppliers to gain a clearer understanding of their overall ESG performance, including supply chain risk management, and to show potential areas for advancement.

## Forced Labour and Child Labour Risks

Mohawk Medbuy recognizes there are inherent risks within the health care sector. Industry-related risks arise from the complexity and diversity of materials and services needed in health care operations. Geography-specific risks may arise from the variations in labour laws, enforcement and governance across global regions.

MMC's risk exposure is directly linked to that of our contracted suppliers, and we have implemented a multi-pronged approach to mitigate such risks. These include a comprehensive Supplier ESG Risk Assessment, contractual and RFX requirements strictly forbidding child labour and forced labour in our supply chain. MMC is developing a Supplier Code of Conduct, which will be implemented in 2026 to reinforce our expectation of suppliers to conduct business ethically, transparently and with the highest levels of integrity.

MMC will continue to strengthen our governance measures to more effectively track and assess how contracted suppliers are addressing forced labour and child labour risks within their operations, as well as the mitigation mechanisms they've implemented to manage those risks.

## Remediation

Mohawk Medbuy has not been made aware of any instances where forced labour or child labour exists in current supply chains, and therefore has not taken:

- Any measures to remediate forced labour or child labour.
- Any measures to remediate the loss of income to the most vulnerable families that results from forced labour or child labour.

## Training

Mohawk Medbuy has developed ESG training that has been completed by all MMC employees, and forms part of the mandatory onboarding training for new employees. The training includes a module addressing the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and provides guidance on relevant contract language, emphasizing that such language must not be removed during contract negotiations.

Mohawk Medbuy has also developed ESG training for Members, which includes content addressing the Act, and can be used by Members for employee training and compliance purposes.

More training will be developed in the next financial year to enhance the current training modules and provide further education to our Strategic Sourcing teams on supplier risk management best practices. These training resources will be available to our Members to use and support their efforts in meeting the requirements of the Act.




## Assessing Effectiveness

Mohawk Medbuy is committed to supporting strong governance and driving continuous improvement across our supply chain. We recognize the importance of assessing the effectiveness of our actions to address forced labour and child labour. To that end, our evaluation process includes:

- Monitoring supplier performance through an annual Supplier ESG Risk Assessment.
- Enhancing current measures by implementing a Supplier ESG Maturity Assessment in 2026 to support the ongoing evaluation of supplier progress.

Sincerely,

**MOHAWK MEDBUY**

  
\_\_\_\_\_  
Janice Mundell  
Chief Marketing Officer and  
Senior Vice President,  
Strategy

  
\_\_\_\_\_  
Peter Longo  
Chief Operating Officer