



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

Financial period:

FY 2024-25 (April 1, 2024, to March 31, 2025)

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 14, 2025

RE: April 1, 2024, to March 31, 2025 (“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 15th day of May, 2025.



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 13th day of May, 2025.



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

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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 2024-25 (April 1, 2024 - March 31, 2025)
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"> • Has a place of business in Canada • Does business in Canada • Has assets in Canada <p>Meets size-related thresholds (select all that apply):</p> <ul style="list-style-type: none"> • Has at least \$20 million in assets for at least one of its two most recent financial years • Employs an average of at least 250 employees for at least one of its two most recent financial years
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"> 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
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"> Importing into Canada goods produced outside Canada
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 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>

		<p>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).</p> <p>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).</p> <p>iii. If the GPO is made aware of any instances where forced labour or child labour exists in supply chains, they will inform HDS.</p> <p>iv. Pursue the development or modification of internal policy and training for those employees in sourcing and supply chain roles.</p>
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 supply chains related to any of the following sectors and industries?	We have not identified forced labour or child labour risks related to any of the above 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"> Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour
18	Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable).	The HDS Procurement and Supply Chain Policies are reviewed regularly to ensure compliance with all legislative acts and requirements.

March 7, 2025

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

Dear Member,

We provide this letter in connection with Bill S-211, the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Act”, “Bill S-211”, “the Bill”).

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

The following steps have been undertaken by Mohawk Medbuy during the **current fiscal year** and may be included for completeness in legislative reporting completed by the Hospital for compliance with Bill S-211.

- Mohawk Medbuy has provided Environmental, Social and Governance (ESG) training (including that specific to Bill S-211) to all relevant employees (including all Sourcing staff). This training highlights obligations, Request for Proposal (RFP), and contract language relevant to Bill S-211 and guides the employees to not allow removal of that language through any negotiations.
- Mohawk Medbuy issued a “Supplier Risk Assessment” in September 2024 to our top 200 suppliers, and Mohawk Medbuy continued to collect this data, including any EcoVadis or similar 3rd party risk assessment reports.
- Mohawk Medbuy’s ESG Team has been 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).

The following steps were undertaken by Mohawk Medbuy during the **previous fiscal year**.

- Mohawk Medbuy has modified standard contract language to include the following in Representation and Warranties:
 - 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).
- Mohawk Medbuy has modified competitive procurement templates (e.g. RFP), to include the following language that suppliers/vendors bidding for Hospital business must attest to:
 - 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).



Other relevant information includes the following:

- 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, Mohawk Medbuy will inform your Chief Financial Officer.
- Mohawk Medbuy formalized an emphasis on sustainability and ESG elements, through the creation of a focused ESG team. This team is responsible for program development, to ensure our organization's ongoing sustainability, as well as supporting our Members as an enabler of a cohesive sustainable health care supply chain built on a high degree of standards.

Sincerely,

MOHAWK MEDBUY

Janice Mundell

Janice Mundell
Chief Marketing Officer and
Senior Vice President,
Strategy

Peter Longo

Peter Longo
Chief Operating Officer