

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

Entity Report for Georgian Bay General Hospital

April 1, 2025 to March 31, 2026

Approval and 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 Chair of the Board of Directors of Georgian Bay General Hospital, attest that I have reviewed the information contained in the report on behalf of the governing body of Georgian Bay General Hospital. 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.

Full name: Bernie Uhlich

Title: Chair of the Board of Directors, Georgian Bay General Hospital

Date: May 29, 2026

Signature: _____

I have the authority to bind Georgian Bay General Hospital.

Identifying Information

Entity or Government institution: Entity

Reporting entity's legal name: Georgian Bay General Hospital

Financial reporting year: April 1, 2025 to March 31, 2026

Financial year covered by report: 2026

(Note the submission date of the report determines which financial year you are reporting on)

Identification of a revised report: No

Business number(s): 107498693

Identification of a joint report: No

Identification of reporting obligations in other jurisdictions: None

Entity categorizations that apply:

- Canadian Business Presence:
 - Has a place of business in Canada
 - Does business in Canada
 - Has assets in Canada
- Size-Related Thresholds that are met:
 - 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
 - Employs an average of at least 250 employees for at least one of its two most recent financial years

Relevant Sectors/industries that apply:

- Health care and social assistance
 - Hospitals

Principal Location: Midland, Ontario, Canada

Annual Report

Introduction

GBGH (the Hospital) is a medium-sized hospital that serves the communities of Midland, Township of Tiny, Township of Tay, Christian Island, Georgian Bay Township and Springwater Township. Our services range from a 40,000 annual visit emergency department to a comprehensive inpatient program that includes, medical, surgical, complex continuing care, rehab, obstetrics and level 3 (basic) intensive care beds, as well as a range of diagnostic, outpatient and clinical support services.

Structure, Activities and Supply Chains

The Hospital is a not-for-profit organization, and a registered charity incorporated without share capital under the laws of Ontario. The Hospital's primary business is to provide direct care to its patients.

A small portion of our business includes the production of goods, specifically we cook meals for the purpose of selling to customers of our cafeteria. The sales in this revenue stream for fiscal 25/26 are estimated at \$131,000 (an estimated 0.1% of the Hospital's total revenue).

The Hospital relies on a distribution centre to provide just in time stock to our hospital twice a week.

The Hospital uses a shared service organization (the "SSO") to facilitate sourcing and execution of procurement initiatives with our vendors. There are times when the Hospital does not use the SSO to execute procurement initiatives. This would typically occur when the value of the procurement is less than \$25,000 and does not require a contract. There are also times when credit cards are used to facilitate smaller dollar purchases.

On average, the Hospital imports an estimated \$66,000 CAD (an estimated 0.2% of total procured spend) a year through its customs broker. This would include any supplies necessary to provide patient care. Examples include lab supplies, IT equipment, medical & surgical supplies, and clinical equipment.

Policies and Due Diligence

The Hospital conducts procurement activities in accordance with its Procurement Policy ("the Policy"), as well as applicable directives and trade agreements including:

- Broader Public Sector (BPS) Accountability Act and BPS Procurement Directive
- Building Ontario Businesses Initiative Act
- Ontario's Procurement Restriction Policy
- Buy Ontario Act
- Canadian Free Trade Agreement
- Canada-European Union Comprehensive Economic and Trade Agreement

In April 2025, the Policy was updated to specifically address forced labour or child labour. If it is discovered that the Policy has not been followed, and the goods have already been received,

services rendered, or a contract executed, the finance or procurement team will use the opportunity to educate regarding policy requirements to reduce the risk of recurrence.

The Hospital, in partnership with the SSO, maintains a contractual framework requiring suppliers to attest that goods and services are not produced using forced labour or child labour. These requirements are embedded in supplier agreements and competitive procurement processes.

The Hospital continues to partner with the SSO to support the identification and mitigation of supply chain risks through structured ESG governance and collaborative working groups. The SSO has a focused approach to Environmental, Social and Governance (ESG) activities, including anything specific to S-211, through the formalization of an ESG working group which collaborates with its hospital members to advance risk mitigation efforts related to forced and child labour.

Potential Areas of Risk

The Hospital and the SSO are not aware of any instances of forced labour or child labour within supply chain activities.

The SSO has identified inherent risks within health care supply chains due to the complexity of procured goods and services and variation in labour practices across global jurisdictions.

As outlined above, there is only a small portion of the Hospital's annual spend that is imported from the United States, contributing to a lower level of direct import-related risk.

While actions have been taken to mitigate risk, further work remains.

Key risk areas include:

- Partial completion of supplier risk assessments (currently 70% of the SSO's contracted spend, with a target of 90% next fiscal year).
- Limited visibility into sub-tier suppliers beyond direct contractual relationships.
- Implementation of a Supplier Code of Conduct, planned for 2026, to further reinforce expectations for ethical and transparent business practices.

The Hospital will continue to identify and mitigate risks by:

- Collaborating with the SSO on their work to request/review risk assessments from suppliers.
- Continued discussion with the SSO at business review meetings, and participating and providing feedback on workplans and progress.
- Review reports published by other hospitals to benchmark and seek out best practices.

Steps Taken to Assess and Reduce Risk

Over the past two reporting periods, the Hospital has progressed from an initial assessment and awareness-building phase to the implementation of formal contractual controls, supplier engagement, and structured ESG risk assessment processes through the SSO.

During the reporting period, the SSO undertook several activities to assess and reduce supply chain risk, including:

- Conducting a Supplier ESG Risk Assessment covering a 70% of the SSO's total contracted spend, reviewing supplier disclosures related to labour practices, regulatory compliance, and supply chain risk management. The SSO has confirmed that no violations were identified through this process based on supplier disclosures.
- Reviewing supplier attestations and contract submissions to ensure compliance with the Act and investigate any concerns and exclude non-compliant suppliers from current and future procurement processes.
- Engaging suppliers through regular business reviews and ongoing communications to promote Environmental, Social and Governance (ESG) expectations and supply chain risk management practices.
- Maintaining a formal whistleblower reporting mechanism, accessible to employees, contractors, and suppliers, to report suspected irregularities on a confidential and anonymous basis.

It is important to note that the hospital also has a whistleblowing protection policy, available on our internal learning system as well as our website.

The SSO keeps member hospitals informed of SSO-led governance processes, including risk assessment outputs and ongoing workplans to strengthen supply chain oversight.

The SSO continues to enhance processes, including expanding ESG risk assessment coverage to approximately 90% of contracted spend and advancing the implementation of a Supplier Code of Conduct that will further reinforce the SSO's standards and expectations of suppliers.

Remediation Measures Taken

Forced labour or child labour in our activities and supply chains has not been identified, and as such, remediation measures were not applicable. If a supplier were to be suspected to be in breach, GBGH will develop and implement a corrective plan to effectively address the issue and immediately remedy the situation. The SSO has advised that their process is to inform the Chief Financial Officer if an instance arises.

The SSO has provided the Hospital with a letter identifying that:

- They are not aware of any instances where forced labour or child labour exists in current supply changes and would inform the Chief Financial Officer if an instance arises.

Training

In early 2025, the Hospital provided training to leaders on the Procurement Policy, including its provisions related to forced and child labour.

The SSO developed ESG training that has now been completed by all SSO 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.

How GBGH Assesses Effectiveness in Ensuring Forced or Child Labour are Not Used in its Activities and Supply Chains

The Hospital and the SSO are focused and committed to ensuring our health care supply chain is built on a high degree of standards. The SSO's ESG team has several initiatives underway to identify risks with current vendors and mitigate supply chain risks moving forward. The Hospital will continue to partner with the SSO to strengthen its approach to identifying and mitigating supply chain risks.

The Hospital, in collaboration with the SSO, assesses effectiveness through ongoing monitoring and evaluation of supplier performance and risk management practices. This includes:

- Supplier ESG Risk Assessments, which evaluate supplier disclosures related to labour practices and compliance with regulatory requirements
- Ongoing supplier engagement through business reviews and communications to assess adherence to ESG expectations

The Hospital and the SSO plan to further enhance effectiveness measurement through future workplans.