



HÔTEL - DIEU GRACE HEALTHCARE

ESTD 1888

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

Organization Report for the Fiscal Year ended March 31, 2026

This report is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211). This report outlines the approach and initiatives by Hotel Dieu Grace Healthcare ("Hospital") to identify and address the risks forced labour and child labour in its business operations and supply chains during the financial year commencing April 1, 2025 and ending March 31, 2026.

Legal Structure

The Hospital is incorporated without share capital under the laws of Ontario. It is a post-acute care community hospital and is a registered charitable organization.

Supply Chain

The Hospital sources medical devices, medical and surgical supplies, and pharmaceuticals and supplies through a network of domestic and global healthcare suppliers. It is a member of healthcare specific buying groups and works closely with a strategic sourcing partner. Its supply chain includes vendors with established Canadian operations and those that source inputs and manufacture and distribute goods in countries around the world.

Risks in Supply Chain

The Hospital is working to identify specific risks of forced labour and child labour that may exist in its supply chain. It recognizes that these risks include but may not be limited to:

- Product substitutions required due to supply chain disruption
- Multi-jurisdiction supply chain for inputs required to manufacture medical, surgical and pharmaceutical supplies, and equipment

- Price sensitivity resulting from public funding environment and shortfalls such that reduced forced labour costs cause a product to be priced more attractively

Actions Taken

To date, the Hospital has worked with its strategic sourcing partners and buying group organization Mohawk Medbuy to ensure appropriate measures are in place for vendors to meet the requirements under the act in competitive and non-competitive procurements. These measures include:

- 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 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).
 - Many of the suppliers of Mohawk Medbuy procurements have a long history of working with Mohawk Medbuy. When new suppliers respond, Mohawk Medbuy thoroughly reviews their responses to the attestation and agreement redlining to ensure that they are in compliant with the Act. If a supplier is found to not be adhering to the law, they will be eliminated from the procurement and any

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future procurements until such time that they can demonstrate compliance.

- Mohawk Medbuy engages suppliers through annual business reviews and ad hoc communications to share their Environmental, Social and Governance (ESG) supply chain risk management efforts, including ESG risk assessments, and their compliance activities under the Act.
- Mohawk Medbuy is committed to supporting the highest standard of ethics in their business practices. Employees, contractors and suppliers must report any suspected irregularity as soon as possible. Mohawk Medbuy'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 third parties (e.g., contractors and suppliers) may make a good faith report about suspected irregularities and is accessed by Mohawk Medbuy through their website.
- Mohawk Medbuy has conducted a **Supplier ESG Risk Assessment** during the Reporting Period, which includes 34 of Mohawk Medbuy's suppliers (representing approximately 70% of Mohawk Medbuy's total contracted spend across all customers). As part of the Assessment, they reviewed supplier disclosures on unethical labour practices, environmental violations, overall regulatory compliance, as well as the supply chain risk management practices and associated documentation. From the suppliers in the sampling, there were no reported violations under the Act (in accordance with their Modern Slavery report submission to Public Safety Canada).
- Mohawk Medbuy's 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.

Additionally, the Hospital maintains employee policies that set forth the duties, responsibilities, and expectations of employment and business conduct. This includes, but is not limited to,

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details on the policies and procedures that help employees operate safely, ethically, and effectively in all roles and in compliance with provincial employment standards, human rights and occupational health and safety legislation.

- Hospital staff responsible for procurement have also been trained on the requirements under Bill S-211

Actions to be Undertaken

Looking forward, the Hospital is working towards the following with Mohawk Medbuy:

- Mohawk Medbuy intends to expand the Supplier ESG Assessment next fiscal to cover 90% of Mohawk Medbuy's overall contract spend across all customers.
- Mohawk Medbuy'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 Mohawk Medbuy's top suppliers.
- Delivered in the form of a supplier survey, a Supplier ESG Maturity Assessment will be implemented in the next fiscal 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.
- Mohawk Medbuy will continue to strengthen 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 have implemented to manage those risks.

Remediation Measures

The Hospital and Mohawk Medbuy have not been made aware of any instances where forced labour or child labour exists in current supply chains, and therefore has not therefore 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.

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Effectiveness Assessment

The Hospital's strategic sourcing partner Mohawk Medbuy has significant expertise in supply chains. The Hospital has leveraged this expertise to help it assess the effectiveness of existing measures to address forced and child labour, and to identify particular areas of risk. (Please see attached letter from Mohawk Medbuy). Mohawk Medbuy is committed to supporting strong governance and driving continuous improvement across our supply chain. They recognize the importance of assessing the effectiveness of their actions in addressing forced labour and child labour. To that end their 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.

ATTESTATION

I attest that I have reviewed the information contained in the report for the entity. 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 this reporting, for the reporting year listed above. I have the authority to bind Hotel Dieu Grace Healthcare

Pat Soulliere
Board Chair

Bill Marra
CEO

Sherri Laframboise
CFO

May 29, 2026

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