

# Bill S211 Fighting Against Forced Labour and Child Labour in Supply Chains Act

# **Reporting Period**

April 1st 2023- March 31st 2024

### Introduction

Pembroke Regional Hospital ("PRH") is determined to be a Reporting Entity under Bill S211 Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"). PRH is classified as an entity because the organization meets the following criteria:

- 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;
  - Employs an average of at least 250 employees for at least one of its two most recent financial years.

PRH is classified as a Reporting Entity because it meets the following criteria:

Sells goods in Canada;

## **Organizational Background** (its structure, activities, and supply chains)

The Pembroke Regional Hospital (PRH) is a Public Hospital as identified in the Public Hospitals Act, R.S.O. 1990. PRH is a federally incorporated corporation and is a medium size Community Hospital located in Pembroke, Renfrew County, which is approximately 150 kilometers north-west of Ottawa. The Pembroke Regional Hospital delivers a broad range of acute, post-acute, outpatient and diagnostic services to a mixed urban and rural population of approximately 55,000 residents in the City of Pembroke, the Town of Petawawa, and surrounding municipalities.

With the dedicated support of nearly 900 staff members, and an engaged physician community, the Pembroke Regional Hospital provides acute services in emergency and intensive care, medical/surgical care, acute mental health, orthopaedics and obstetrics. PRH has a full range of rehabilitation services, is the designated District Stroke Centre for our region, and provides community-based mental health services throughout Renfrew County. Chemotherapy, dialysis and a variety of ambulatory care clinics are offered on an outpatient basis through partnerships with regional centres and nearby specialists. The Hospital offers a full range of diagnostic services including computed tomography, MRI (magnetic resonance imaging), nuclear medicine and mammography.

Pembroke Regional Hospital must 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. PRH procures goods, and services independently as well as through Group Purchasing Organizations (GPO) and Shared Services Organizations (SSO).



<u>Prevention Efforts</u> (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)

In the 2023-24 fiscal year PRH began the process of reviewing its supply chain processes to identify potential risks related to forced and child labour. PRH purchases many products through large GPOs and Shared Service Organizations that serve hospitals province wide and has begun looking into the language and clauses used in their respective processes.

<u>Policies and Due Diligences (its policies and due diligence processes in relation to forced labour and child labour)</u>

Currently PRH does not have a policy or process in place specifically addressing child & forced labour, however, PRH is reviewing existing policies to see what, if anything, could be expanded or updated to include more specific language regarding this issue.

**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)

PRH recognizes the importance of this issue, and is in the initial stages of identifying potential risk in the supply chain. PRH is currently unaware of any issues in our supply chain but is looking into how best to verify this.

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

PRH is currently unaware of instances of forced or child labour in its supply chain and as a result has not taken any remediation actions in this reporting period. PRH is looking into verifying this information, and will adjust its response based on any new information received.

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)

PRH is currently unaware of instances of forced or child labour in its supply chain and as a result has not taken any actions to mitigate income loss in this reporting period. PRH is looking into verifying this information, and will adjust its response based on any new information received.

### **Employee Training** (the training provided to employees on forced labour and child labour)

Training relevant/appropriate staff on what due diligence measures should be taken to address this issue will be important in the implementation of any practices or policy changes implemented by PRH. PRH is currently reviewing what this will look like for the 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)

PRH does not currently have policies in place to assess the effectiveness of its efforts to ensure forced labour and child labour are not being used in its supply chain activities. Policies and procedures to assess the effectiveness of our actions will be reviewed in fiscal 2024/2025.



# **Documentation**

PRH 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.

Sabine Mersmann

Date: May 29, 2024

Date: May 29, 2024

CEO

I have the authority to bind Pembroke Regional Hospital.

David Unrau

Chair of the Board

I have the authority to bind Pembroke Regional Hospital.