

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

Reporting Period

April 1, 2025 to March 31, 2026

Introduction

Pembroke Regional Hospital (“PRH”) is determined to be a Reporting Entity under Bill S-211 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, and
 - 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 *(structure, activities, and supply chains)*

Pembroke Regional Hospital (PRH) is a public hospital as defined under the Public Hospitals Act, R.S.O. 1990. PRH is a federally incorporated, medium-sized community hospital located in Pembroke, in the County of Renfrew, approximately 150 kilometres northwest of Ottawa. The Hospital provides a broad range of acute, post-acute, outpatient, and diagnostic services to a mixed urban and rural population of approximately 55,000 residents within the City of Pembroke, the Town of Petawawa, and surrounding municipalities.

Supported by nearly 900 dedicated staff members and an engaged physician community, Pembroke Regional Hospital delivers a comprehensive suite of acute care services, including emergency and intensive care, medical and surgical services, acute mental health, orthopedics, and obstetrics. PRH also offers a full range of rehabilitation services, serves as the designated District Stroke Centre for the region, and provides community-based mental health services throughout Renfrew County. Chemotherapy, dialysis, and a variety of ambulatory care clinics are delivered on an outpatient basis through partnerships with regional centres and local specialists. In addition, the Hospital provides a comprehensive range of diagnostic services, including computed tomography (CT), magnetic resonance imaging (MRI), nuclear medicine, and mammography.

Pembroke Regional Hospital adheres to all applicable public procurement requirements, including the Ontario Broader Public Sector Procurement Directives, the Canadian Free Trade Agreement (CFTA), the Comprehensive Economic and Trade Agreement (CETA), and the United States–Mexico–Canada



Agreement (USMCA). PRH procures goods and services both independently and through Group Purchasing Organizations (GPOs) and Shared Services Organizations (SSOs).

Prevention Efforts *(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)*

During the 2025/2026 fiscal year, Pembroke Regional Hospital (PRH) maintained its practice of reviewing supply chain processes to identify and mitigate potential risks related to forced and child labour.

As PRH procures many goods and services through large Group Purchasing Organizations (GPOs) and Shared Services Organizations (SSOs) that support hospitals across the province, it has become standard practice to review forced and child labour provisions within each contract prior to execution.

Policies and Due Diligence *(its policies and due diligence processes in relation to forced labour and child labour)*

PRH has incorporated clauses into its procurement documents and contracts that explicitly prohibit the use of forced and child labour. In addition, PRH has verified that its Group Purchasing Organizations (GPOs) and Shared Services Organizations (SSOs) have updated their processes and contractual agreements to include comparable provisions.

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 is not aware of any issues related to forced or child labour within its supply chain. This position has been further supported through documentation received from its GPO and SSO partners, outlining their request for proposal (RFP) practices, contractual language, and implementation roadmaps.

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

As PRH is not aware of any instances of forced or child labour in its supply chain, no remediation actions were required or implemented during this reporting period.

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)*

As PRH is not aware of any instances of forced or child labour in its supply chain, no remediation actions were required or implemented during this reporting period.

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

Training appropriate staff on due diligence measures to address forced and child labour risks will be a key component of implementing any related policy or practice changes at PRH. The Hospital is currently evaluating how this training will be designed and delivered across the organization.

Assessing Effectiveness *(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)*

Following the incorporation of forced and child labour requirements into its procurement documents and contracts, and upon receiving assurances from its Group Purchasing Organizations (GPOs) and Shared Services Organizations (SSOs) regarding their compliance with applicable legislation, PRH continues to monitor and review these measures to ensure ongoing accuracy and effectiveness.

Documentation

PRH maintains complete and accurate records to support the statements and representations made throughout this Report.

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 attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.



Sabine Mersmann
CEO

I have the authority to bind Pembroke Regional Hospital

19-05-2026

Date



Dean Sauriol
Chair of the Board

I have the authority to bind Pembroke Regional Hospital

May 25, 2026

Date