

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

Report for Kingston Health Sciences Centre for the year ended March 31, 2025

Introduction

This Report has been prepared in accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Act”) in relation to the fiscal year from April 01, 2024, to March 31, 2025. The measures in the Act aim to increase industry awareness and transparency and drive business to improve practices related to procurement of goods which involve forced labour and child labour in the supply chain.

This Report was developed following consultation with relevant Kingston Health Sciences Centre (KHSC) personnel and personnel from Mohawk Medbuy Corporation (MMC), and outlines actions taken by KHSC during the fiscal year to prevent and reduce the risk of forced and/or child labour within its operations and supply chains.

This Report has been approved by KHSC’s Board of Directors

KHSC is committed to respecting human rights as a fundamental principle in our operations.

Kingston Health Sciences Centre is defined as an “Entity” under Bill S-211 and, therefore, must submit an annual report to the Minister of Public Safety by May 31 of each year. Reports must detail the steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used by KHSC in our supply chains.

All reports will be made available to the public in two ways:

- On the KHSC website
- In an electronic registry on Public Safety Canada’s website

The following information uses the Minister’s online questionnaire as the template for the report.



**Kingston Health
Sciences Centre**

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Questionnaire Responses

#	Question	Response
1	This Report is for...	An Entity
2	Legal Name	Kingston Health Sciences Centre
3	Financial Reporting Year	April 1, 2024 to March 31, 2025
4	Is this a revised version of a report already submitted this fiscal year?	No
5	Business Number	75640 5890
6	Is this a joint report?	No
7	Is the entity subject to reporting in another jurisdiction	No
8	Which categorizations applies to the entity?	<p>Canadian business presence:</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:</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 • 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
9	Which sectors or industries does the entity operate in?	Health Care and Social Assistance
10	In which country is the entity headquartered or principally located?	Canada
10.1	In which province or territory is the entity headquartered or principally located?	Ontario
11	For government institutions only	Not Applicable



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Annual Report

#	Question	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	Monitoring Suppliers, with the help of our group purchasing partners.
2	Please provide additional information describing the steps taken (if applicable).	Mohawk Medbuy Corporation (MMC) is our primary group purchasing organization and their Request for Proposal (RFP) Attestation Form and Contract template includes language related to preventing and reducing the risk of forced or child labour being used by suppliers or in their supply chains.
3	Which of the following accurately describes the entity's structure?	Not for profit, charitable, incorporated organization
4	Which of the following accurately describes the entity's activities?	Importing into Canada goods produced outside Canada.
5	Please provide additional information on the entity's structure, activities and supply chains.	<p>Kingston Health Sciences Centre is southeastern Ontario's complex, acute and specialty care, research, and teaching hospital. Consisting of our Hotel Dieu site and Kingston General site, as well as the Cancer Centre of Southeastern Ontario and our research institute, we care for more than 500,000 patients and their families from across our region.</p> <p>As one of the region's largest employers, we are home to almost 6,000 staff, more than 2,000 health-care learners and 1,000 volunteers who are committed to partnering with patients and families to ensure that we continually provide high quality, compassionate care. Fully affiliated with Queen's University, we are ranked as one of Canada's top research hospitals.</p> <p>KHSC purchases medical supplies and equipment to provide healthcare to patients, in addition to goods and services needed to</p>



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		support the infrastructure, research and back-office functions. KHSC is the importer of record for the goods we purchase outside of Canada and therefore needs to comply with the Customs Act. KHSC purchases directly from suppliers, distributors and manufacturers that are licensed to sell goods and services in Canada. Our supply chains include sub-contractors and third parties to our direct suppliers. KHSC is a member of group purchasing organizations (GPO) and leverages regional, provincial, and national contracts. KHSC no longer has its own procurement department and largely relies on MMC and HealthPro for sourcing products.
6	Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?	Yes, through the partnership with our GPO, Mohawk Medbuy Corporation.
6.1	If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour?	Embedding responsible business conduct into policies, management systems and procurement processes.
7	Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour.	No additional information to add.
8	Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?	Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks. Top risks are with high volume, high competition purchases. These are typically managed through MMC.
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?	No
10	Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or	Confirmed that MMC and HealthPro have a process for addressing compliance with suppliers.

	child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable)	
11	Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?	Not applicable. KHSC has not identified any forced labour or child labour in its 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. KHSC has not identified any loss of income to vulnerable families resulting from measures take 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?	Training has been provided only to employees and management directly involved in our supply chain purchasing activities.
16	Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable).	Initial training was provided when the Act became law, targeted to supply chain personnel. In the past fiscal year our GPO partner, 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

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?	Our GPO partner, Mohawk Medbuy, issued a "Supplier Risk Assessment" in September 2024 to our top 200 suppliers, and Mohawk Medbuy continues to collect and monitor this data.
17.1	If yes, what method does the entity use to assess its effectiveness?	Through an annual update from Mohawk Medbuy. For the past fiscal year Mohawk Medbuy has confirmed that they have not been made aware of any instances where forced labour or child labour exists in current supply chains. However, if such instances come to light, Mohawk Medbuy has committed to informing the KHSC Chief Financial Officer.
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	KHSC is working with our GPO and other major partners to ensure the identification and elimination of forced labour and child labour in our supply chain activities is accomplished through the RFP processes and contracting language, as well as targeted training activities.

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.

I have the authority to bind the corporation:

 May 26, 2025

Dr. David Pichora
President & CEO

Date

 May 26, 2025

Sherri McCullough
Chair, Board of Directors

Date



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