



Fighting Against Forced Labour and Child Labour in Supply Chains Act Annual Report (the Act) - Fiscal 2025/26

Thunder Bay Regional Health Sciences Centre (TBRHSC) is a world-class acute healthcare facility with 425 beds located in Thunder Bay, Ontario. We provide quality care to patients and families, supported and advanced by research, innovation, and education that is responsive to the needs of the population of Northwestern Ontario. The care and services that we offer includes, but is not limited to, General Medicine, Cardiology, Coronary Angioplasty, General Surgery, Neurosurgery, Orthopaedic Surgery, Maternal/Child Services, Renal Dialysis, Cancer Centre, and Mental Health Services. As a designated academic health sciences centre, TBRHSC is a host training facility for students from the Northern Ontario School of Medicine (NOSM) and other medical schools.

TBRHSC is an entity governed by its Board of Directors, with assets above \$20 Million. We currently staff 3,700 employees, with seven union groups and a non-union group. The purchasing department centrally manages our supply chain where we strategically source a broad range of goods, services and construction, including the importation of goods and services. The goods and services purchased includes, but is not limited to, professional services, medical equipment and supplies, facilities operation and maintenance services, office supplies, and food products. As a Broader Public Sector (BPS) Organization, our activities strictly follow internal policies and the BPS Procurement Directive as required by the Broader Public Sector Accountability Act, 2010. Purchasing policies are reviewed regularly and available to all staff on the Intranet.

TBRHSC continuously makes improvements to our supply chain functions and are committed to Canada's fight against forced labour and child labour in supply chains. We have embedded responsible business conduct into our supply chain activities through the following strategies:

- Inclusion of a mandatory supplier attestation in our competitive tender documents, which warrants that the goods and services that the supplier has proposed to provide are not the result of, or in any way involved with, forced labour or child labour;
- Updated our Contract language to include mandatory provisions aligned with the Act;
- Added termination language to our standard Contract, which allows for immediate contract termination if a supplier is found to be involved with forced labour and child labour in their supply chain;
- Prioritize awarding contracts to Canadian or Ontario suppliers and manufacturers;
- Collaboratively work with and enter supplier agreements facilitated by trusted Group Purchasing Organizations such as Mohawk Medbuy, who have attested compliance with the Act;



- Where possible, procure through a Vendor of Record arrangement managed by the Ontario Ministry of Public and Business Service Delivery and Supply Ontario;
- Updated internal Administration and Purchasing policies to maintain compliance and align our processes with the Act; and
- Provide continuous training and orientation on our Purchasing policies and procedures for new and existing leaders in our organization, and staff that are involved with contracting and purchasing decisions.

Over the next year, TBRHSC will further identify and mitigate risks associated with forced and child labour in our supply chain by taking the following actions:

- Develop tools to incorporate principles of the Act into our supplier performance reviews and evaluation process;
- Continue to enhance training for staff regarding our obligations under the Act, including guidance to support escalation and resolution issues of non-compliance with the Act;
- Where available, participate in training and education on the requirements of the Act;
- Work with partner organizations and governing bodies to identify effective tools that can be implemented to protect our supply chain against the use of forced labour and child labour; and
- Continue to seek and identify high risk areas and sectors within our supply chain and develop tools to mitigate risk in these areas.

As a healthcare facility, our greatest risk of engaging with a supplier that is involved with forced labour or child labour is during an unanticipated event, which results in a long-term supply chain shortage. The most recent example of this risk occurred during the pandemic. Throughout the pandemic, we increased our due diligence in vetting suppliers and products to ensure they held appropriate business credentials such as FDA/Health Canada approvals. To minimize the risk of supply shortages, TBRHSC looks to secure contracts with Canadian manufacturers and/or those with manufacturing facilities in multiple sites.

Other than identifying potential risks, TBRHSC has not identified a supplier that we conduct business with that is non-compliant with the Act. TBRHSC remains committed to managing risk across our supply chain to continuously meet regulatory and ethical obligations.

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 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.



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Name: Rhonda Crocker Ellacott

Title: President & CEO

Date: March 26, 2020

Signature: 

I have the authority to bind Thunder Bay Regional Health Sciences Centre.