

BILL S-211 – ANNUAL REPORT

ST. JOSEPH’S HEALTH CARE LONDON

Approved by the Board of Directors May 27, 2024

St. Joseph’s Health Care London (St. Joseph’s) is committed to reducing the risk of forced labour and child labour in supply chains in alignment with Bill S-211: An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff.

St. Joseph’s procurement and supply chain functions are managed by Healthcare Materials Management Services (HMMS), a joint venture that St. Joseph’s operates with London Health Sciences Centre. St. Joseph’s maintains corporate policies to support the application of appropriate procurement practices for the solicitation of supplier bids and the award of contracts for goods and services including maintaining a supply chain code of ethics. St. Joseph’s and HMMS work collaboratively to respond to changes in legislative requirements, such as the introduction of Bill S-211.

HMMS supports St. Joseph’s in ensuring corporate policies are followed as procurement activities are undertaken. In working with St. Joseph’s vendors, the development of appropriate contract terms and conditions and competitive procurement templates and processes play a key role in ensuring any vendor that St. Joseph’s engages with complies and will maintain compliance with all appropriate legislation during the term of any agreement.

In response to the introduction of Bill S-211, St. Joseph’s has introduced several changes to contracting and procurement processes to ensure all vendor relationships are and remain in compliance with this legislation including:

1. Modification of standard contract language applicable to all vendors including purchase order terms and conditions to include the following vendor requirement:
 - a. “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 Chains Act).”
2. Modification of competitive procurement templates (e.g. “Request for Proposal”) to require all prospective suppliers / vendors bidding on a potential contract with St. Joseph’s to attest to the following:
 - a. “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).”

All staff and leaders that support procurement processes for St. Joseph's at HMMS are regularly updated on the terms and conditions of St. Joseph's standard vendor contracts and the competitive procurement requirements of all prospective vendors. This ensures compliance conversations relating to Bill S-211 are part of both the decision to select a vendor as well as the management of the ongoing relationship with a vendor of St. Joseph's.

St. Joseph's assesses at least annually the appropriateness of its procurement policies, processes and procedures as a whole, including compliance with all applicable legislation and where necessary, undertakes a formal review of relevant corporate policies. These reviews enable an evaluation of the effectiveness of current policies and possible responses to any identified opportunities for improvement, including those related to compliance with applicable legislation.

St. Joseph's, nor HMMS, are aware of any instances where forced labour or child labour exists in current supply chains as of the date of 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.

original signed

Roy Butler
President and Chief Executive Officer
St. Joseph's Health Care London

May 27, 2024