

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

Bruyère Continuing Care has determined itself to be a Reporting Entity as outlined in Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"). The Hospital 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;
 - Has generated at least \$40 million in revenue 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.

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

- Sells goods in Canada; and
- Imports goods into Canada that are produced outside of Canada.

Bruyère has very minimal activities relating to the resale of goods given the nature of the activities. The sale of merchandise is related to the cafeteria and Marketed services (boutique).

The Hospital is completing this Report for only itself and is not representing any other Entity. Bruyère Continuing Care is a corporation that conducts its business in Ottawa, Ontario, Canada, is in the healthcare industry, and its business number is 87274 0766.

This report will be covering the fiscal year of 2023-2024. It will only include measures and steps taken by the organization during this timeframe. This is the first and final version of this Report.

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

Bruyère Continuing Care Inc. was incorporated in April 1996 under the Corporations Act of Ontario and is a registered charity under the Income Tax Act. Bruyère is deemed to be a government not-for-profit organization under the Canadian public sector accounting standards.

Bruyère Continuing Care Inc consists of Saint-Vincent Hospital, Élisabeth Bruyère Hospital and Greystone Village, which constitute the Bruyère Hospitals, the Saint-Louis Residence and the Élisabeth Bruyère Residence which constitute the Long-term Care Homes, Community Support Services, Bruyère Village and Family Medicine. Bruyère is an academic health care organization committed to providing compassionate and holistic care, respecting the dignity and diversity of all. As a Catholic organization, we are inspired by the values and legacy of [Mother Élisabeth Bruyère](#). Our services in aging and rehabilitation, medically complex, palliative, residential and primary care respond to your needs throughout your life. Employing over 2,300 employees; an operating budget of over \$255 million; over 878 beds and 227 of independent and assisted living units.

Bruyère and Saint-Louis Residence 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. The Hospital procures goods, and services independently as well as through Group Purchasing Organizations (GPO) and Shared Services Organizations (SSO).

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)*

Steps taken to prevent and reduce forced labour and child labour risks:

- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour.
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour.
- Engaging with other regional entities to discuss child labor and/or forced labor in order to establish how the organization could improve its procurement practices.

To the best of Bruyère's knowledge, all Group Purchasing Organizations (GPOs) and Shared Service Organizations (SSOs) of which Bruyère affiliates, are all complying with the Act's requirements for their sourcing and procurement activities. Bruyère purchases the majority of its products through GPO such as HealthPro and MohawkMedbuy;

For the 2024/2025 fiscal year, the hospital will update his Procurement policy, request attestations from current suppliers/service providers and create stricter agreement clauses in our call for tender. Bruyère will also provide mandatory training for its procurement department employees and all management team.

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

Bruyère complies with all applicable labor laws and regulations, including those relating to child labor and forced labor.

As of the end of the 2023-2024 fiscal year, Bruyère did not have any policies or due diligences processes in place related to forced labour and child labour related to his Procurements activities.

However, all our employees are required to comply with our procurement policy which states that all procurement activities must be Compliance with Laws and Regulations: We use ethical business practices in compliance with and informed by relevant laws , regulations, directives, including the Ontario Broader Public Sector Supply Chain Code of Ethics, and Bruyère codes of conduct and conflict of interest policies. Bruyère is accountable for the results of its procurement decisions, appropriateness of the processes followed, and maintenance of appropriate documentation to provide evidence of such compliance.

Policies on force labour and child labour and due diligences will be put in place for the upcoming 2024/2025 fiscal year. The Hospital plans to update its procurement policy and require all publicly posted tenders to stipulate that suppliers must report on their forced labour and child labour policies, and articulate if their supply chains are at risk of propagating forced labour or child labour.

Bruyère complies with all applicable labor laws and regulations, including those relating to child labor and forced labor.

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)*

Bruyère, in collaboration with Group Purchase Organization (CHSS, Healthpro, Mohawk Medbuy), OHA and Ontario Buy has started the process of identifying risks of forced labour and child labour in its activities and supply chains but has not identified any specific risks or taken any remediation measures.

As the Hospital operates in Ontario, there are no risks of forced or child labour within the organization, however there are risks of forced labour and child labour with the suppliers that partner with the Hospital. The Hospital will attempt to identify suppliers that have risks of forced labour and child labour and will make every effort to eliminate future use of their products or services.

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

Bruyère has not identified any supplier that has the risk of forced labour or child labour. Due to the lack of findings, the Hospital has not taken any remediation actions to eliminate forced labour or child labour within its organization. The Hospital will stay vigilant and continuously monitor for any forced labour and child labour within its supply chain partnerships.

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)*

Bruyère has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our supply chain activities. The Hospital will continue to diligently review

and assess the potential of income loss and ensure our supply chain partners are taking immediate action to remediate the situation.

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

Bruyère does not currently provide training to employees on forced labour and/or child labour and does not 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 supply chain activities.

However, Bruyère has a mandatory training course for all employees on Equity, Diversity and Inclusion to build an environment that is equitable, inclusive and reflective of our community at every level of our 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)*

Bruyère 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 and implemented in fiscal 2024/2025. The Hospital will monitor and engage with its supply chain partners to understand the impact our actions are having on the reduction of forced labour and child labour in our supply chains.

Documentation

The Hospital 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.



Date: May 24, 2024

John Hoyles
Chair of the Board of Directors
Bruyère Continuing Care Inc.
I have the authority to bind the organization