

CLINTON
PUBLIC HOSPITAL

ST. MARYS MEMORIAL HOSPITAL

SEAFORTH COMMUNITY HOSPITAL

STRATFORD GENERAL HOSPITAL May 30, 2025

Canadian Statement Against Forced Labour and Child Labour in Supply Chains pursuant to an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff, referred to as Canada's "Modern Slavery Act" (the "Act", Bill S-211", "the Bill") for the year ending March 31, 2025.

1. INTRODUCTION

This is a statement made by Huron Perth Healthcare Alliance (HPHA), in respect of the Act, as referenced above. Huron Perth Healthcare Alliance (HPHA) is a corporation incorporated pursuant to the laws of Ontario, Canada.

2. REPORTING ENTITY

This report is being filed by Huron Perth Healthcare Alliance (HPHA) on its own behalf. This report is being filed with respect to the financial year ended March 31, 2025 (the "Reporting Period").

3. STRUCTURE, ACTIVITES AND SUPPLY CHAINS

HPHA is a not-for-profit healthcare organization operating four hospital sites across Ontario, Canada. Our core mandate is to deliver acute care and community-based health services. Our supply chain primarily involves the procurement of medical equipment, pharmaceuticals, and various healthcare-related products, sourced predominantly through Canadian distributors. These suppliers are subject to regulation by Health Canada and other relevant bodies.

To strengthen our commitment to ethical sourcing with respect to potential forced labour and child labour risks in our supply chains, HPHA has implemented standard language to explicitly state that the goods and services provided by suppliers under our agreements are not derived from forced labour or child labour, as defined in Canada's Fighting against Forced Labour and Child Labour in Supply Chains Act.

HPHA has also updated standard competitive procurement templates, such as Requests for Proposals (RFPs), to include language requiring suppliers/vendors to warrant that their proposed goods and services do not involve forced labour or child labour, in accordance with the Act.

4. POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

HPHA is committed to ensuring that forced labour and child labour are not present in our business or supply chains.

HPHA has taken steps to reinforce this commitment, including, reviewing contracts to include compliance clauses, where applicable and collaborating with industry groups to share due diligence methodologies and best practices in addressing supply chain risks. In addition to these actions, HPHA aims to further enhance our processes by including structured supplier audits, enhanced risk assessments and periodic compliance checks to ensure adherence to these standards.

Our supply chains involve the procurement of medical equipment, pharmaceuticals, and other healthcare-related supplies, primarily though Canadian distributors. Given the nature of our industry, we are tightly regulated by Health Canada, including Health Canada's approvals for our procurement requirements. HPHA follows the Broader Public Sector Procurement Directive (BPS) Supply Chain Code of Ethics to ensure an ethical, professional and accountable supply chain.

5. PARTS OF BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR AND STEPS TAKEN TO ASSESS AND MANAGE THAT RISK

While the risk of forced labour and child labour in our direct operations is low, we acknowledge that certain parts of our supply chains, particularly those involving the procurement of medical supplies and pharmaceuticals from high-risk regions, may pose elevated risks. To mitigate such risks, HPHA is committed to:

- Conducting more comprehensive supplier risk assessments;
- Requiring supplier certifications of compliance; and
- Engaging with sector partners to improve transparency and collective accountability.

6. MEASURES TAKEN TO REMEDIATE FORCED LABOUR AND CHILD LABOUR

In the event that forced labour or child labour is identified, HPHA would take immediate action to remediate the situation. This could include working with suppliers to correct violations, terminating contracts if compliance is not achieved, and reporting findings to the relevant authorities. During the Reporting Period, HPHA did not identify any instances of forced labour or child labour in our operations or supply chains. Accordingly, no measures were taken to remediate forced labour or child labour.

7. MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO MOST VULNERABLE FAMILIES THAT RESULT FROM MEASURES TAKEN TO ELIMINATE USE OF FORCED LABOUR AND CHILD LABOUR

During the reporting period, HPHA did not identify any instances of forced labour or child labour in our operations or supply chains. Accordingly, no measures were taken to remediate the loss of income to the most vulnerable families that result from measures taken to eliminate the use of forced labour and child labour. HPHA is committed to supporting the most vulnerable families affected by the elimination of forced labour and child labour. HPHA partners with many local organizations who could provide alternative income opportunities, education, and social services to families impacted by these measures.

8. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR HPHA continues to provide training to employees involved in procurement and supply chain management on the issues of forced labour and child labour. The training includes recognizing the signs of such practices, understanding our policies and procedures, and knowing how to report and address any concerns.

HPHA continues to evaluate and refine its training for all employees involved in procurement to ensure compliance with legislative requirements under Ontario's Broader Public Sector Procurement Directive (BPS) and relevant Trade Agreements, including the Comprehensive Economic Trade Agreement (CETA) and Canadian Free Trade Agreement (CFTA). HPHA follows the Broader Public Sector Procurement Directive (BPS) Supply Chain Code of Ethics to ensure an ethical, professional and accountable supply chain.

9. HOW ENTITY ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR IS NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS HPHA currently assesses the effectiveness of its policies and measures through regular audits, supplier assessments, and feedback from stakeholders. Huron Perth Healthcare Alliance (HPHA) also tracks compliance metrics, review audit findings, and continuously improve our processes based on the results.

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. For clarity, I am providing this attestation in my capacity as a director and officer of Huron Perth Healthcare Alliance, and not in my personal capacity.

PRINTED NAME & TITLE	SIGNATURE & DATE
Andrew Williams	
President & Chief Executive Officer	
Huron Perth Healthcare Alliance	
I have the authority to bind the Corporation	May 29, 2025
Iris Michaels	
Vice President, Performance, Finance and	
Digital Innovation	
Huron Perth Healthcare Alliance	
I have the authority to bind the Corporation	May 29, 2025
John Wilkinson	
Board Chair	
Huron Perth Healthcare Alliance	
I certify that this attestation has been approved	
by the board of the Huron Perth Healthcare	
Alliance on May 30, 2025.	
	May 29, 2025