

Bill S-211 Annual Report

Fiscal Year April 1, 2025 – March 31, 2026

Orillia Soldiers' Memorial Hospital ("OSMH") is a health care provider who works with community partners together to provide a wide range of health services from emergency care and community-based programming supporting our patients, their families and their caregivers in Ontario, Canada. The following information has been prepared by OSMH in alignment with the annual report requirements as detailed in the "Act". This report outlines the measures taken to prevent and reduce the risk that forced labour or child labour is used by Canadian organizations or by their supply chains.

Orillia Soldiers' Memorial Hospital (OSMH) has remained committed to upholding the principles outlined in Bill S-211. OSMH continues to take proactive and meaningful steps to prevent and reduce the risk that forced labour or child labour is used across relevant stages of the production and procurement of goods and services, whether in Canada or abroad.

Key actions undertaken during the reporting period include:

- Conducting internal assessments of risks related to forced labour and/or child labour within OSMH's activities and supply chains
- Engaging external expertise to support risk identification and assessment activities
- Requiring suppliers to maintain policies and procedures that prohibit the use of forced labour and/or child labour within their operations and supply chains
- Embedding anti-forced labour and child labour provisions into all RFx documentation, service agreements, and contractual arrangements
- Ensuring that Group Purchasing Organizations (GPOs) utilized by OSMH have implemented measures to reduce risk and strengthen prevention activities
- Monitoring supplier compliance and maintaining proportionate, risk-based oversight practices
- Engaging with supply chain partners to reinforce expectations and promote ethical and responsible sourcing practices

A key component of OSMH's approach is the integration of responsible procurement principles into its procurement framework. By embedding clear and consistent expectations within sourcing and contracting processes, OSMH ensures that suppliers and partners are aware of, and accountable to, the ethical standards upheld by the organization.

In addition, OSMH has strengthened its commitment to ethical sourcing through membership in the Canadian Collaboration for Sustainable Procurement (CCSP). One of the core pillars of CCSP is ethical procurement, which includes supporting alignment with the United Nations Universal Declaration of Human Rights and the conventions established by the International Labour

Organization related to child labour, forced labour, and employment discrimination. This membership further reinforces OSMH's alignment with nationally recognized leading practices in responsible and sustainable procurement.

Planned and Ongoing Enhancements

OSMH remains committed to continuous improvement and will further enhance its approach through the following initiatives:

- Performing progressive, risk-informed mapping of supply chains to improve transparency and risk visibility
- Expanding training and awareness initiatives across the organization
- Incorporating formal supplier attestations to confirm compliance with forced labour and child labour requirements
- Exploring the implementation of a Supplier Code of Conduct to formalize expectations, aligned with leading practices and/or MMC partner frameworks
- Advancing Environmental, Social, and Governance (ESG)-aligned training and procurement practices

Structure, Activities, and Supply Chain

OSMH operates within a collaborative healthcare procurement model and works closely with Group Purchasing Organizations (GPOs) that specialize in healthcare sourcing and vendor management.

- A significant portion of goods and services are procured through GPO agreements, which include pre-qualified vendors and established compliance requirements
- Select procurements are conducted through local Request for Proposal (RFP) processes
- OSMH primarily procures goods and services from suppliers that are authorized and licensed to operate within Canada. GPO partners play a critical role in screening vendors, monitoring compliance, and supporting ethical procurement practices aligned with the expectations set out in Bill S-211.

Due Diligence Processes

OSMH has established policies and due diligence processes to address risks related to forced labour and/or child labour. Key elements include:

- Embedding responsible business conduct into organizational policies and management systems
- Identifying and assessing potential adverse impacts within operations, supply chains, and business relationships
- Tracking implementation efforts and monitoring outcomes, where practicable.

This remains an evolving area of focus. While OSMH has made meaningful progress in identifying potential risks, gaps remain. These gaps will continue to be monitored and addressed through ongoing enhancements to processes and policies.

Risk Identification and Remediation

OSMH has not identified any instances of forced labour or child labour within its activities or supply chains during the reporting period. As such:

- No remediation measures have been required
- No loss of income to vulnerable families has been identified as a result of actions taken by OSMH.

OSMH remains committed to acting promptly and appropriately should any risks or instances be identified in the future.

Training and Awareness

OSMH provides targeted training to employees involved in procurement and contracting activities. This training is mandatory for applicable team members supporting purchasing and sourcing decisions.

In addition, OSMH has strengthened internal awareness through:

- Materials Management (MM) Huddles and direct training sessions focused on Bill S-211 education

Further training materials and resources will continue to be developed and deployed to enhance organizational awareness and engagement.

Assessing Effectiveness

OSMH evaluates its effectiveness in preventing forced labour and child labour through:

- Ongoing risk assessments within its supply chain
- Collaboration with suppliers and GPO partners to evaluate the effectiveness of mitigation strategies
- Monitoring relevant performance indicators, where available and appropriate
- Maintaining and tracking supplier attestations in alignment with Bill S-211 requirements

Forward-Looking Commitment

Looking ahead, OSMH remains committed to strengthening its approach through continuous improvement. This includes refining risk identification processes, addressing identified gaps, and aligning with leading practices in ethical procurement, including those supported through participation in CCSP and broader ESG-informed frameworks.