

**ANNUAL REPORT**  
Prepared in accordance with Section 11  
*of the Fighting Against Forced Labour and Child Labour  
in Supply Chains Act*

**Introduction**

Cornwall Community Hospital (the “Hospital”) 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.

The Hospital 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.

Cornwall Community Hospital is a corporation that conducts its business in Cornwall Ontario, Canada, is in the healthcare and social assistance industry, and its business number is 10697 4991. The Hospital is completing this Report for only itself, and is not representing any other Entity.

This report will be covering the fiscal year of 2023-2024 (April 1, 2023 to March 31, 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)*

Cornwall Community Hospital is a provincially funded, not-for-profit organization located in the City of Cornwall. The Hospital is a registered charity under the *Income Tax Act*.

Cornwall Community Hospital (CCH) provides full-service acute care and community services to a culturally diverse region of more than 110,000 people in Eastern Ontario, including the City of Cornwall, Stormont, Dundas, Glengarry, and the Mohawk community of Akwesasne.

Having undergone a major redevelopment project in 2014, CCH boasts a modern and state-of-the-art facility, housing 185 beds and employing more than 1,300 staff and 180 physicians. CCH is also an affiliated teaching hospital of the University of Ottawa, St. Lawrence College, Queen's University and other educational institutions, welcoming more than 200 students and medical learners every year.

Our committed and diverse healthcare teams collaborate to provide exceptional people-centered care, guided by our ICARE values of Integrity, Compassion, Accountability, Respect and Engagement. We pride ourselves on a collaborative and compassionate environment and approach to care that is equitable and empowering for those it serves. Cornwall Community Hospital must adhere to the Ontario *Broader Public Sector Accountability Act*, related Procurement Directives and associated trade agreements including but not limited to The Canadian Free Trade Agreement, the Canada-European Union Comprehensive Economic Trade Agreement (CETA), 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 entity)*

Since the implementation of the Act, Cornwall Community Hospital must and shall ensure its suppliers attest to adhering to the Act when submitting bids to its publicly posted tenders, such as RFP, RFT, RFS, RFQ, etc. All Group Purchasing Organizations (GPOs) and Shared Service Organizations (SSOs) of which the Hospital affiliates, are also complying with the Act's requirements for their sourcing and procurement activities.

The hospital has been reviewing supply chain ethics commitments made by suppliers, to ensure their supply chains are free of forced labour and child labour. This review will continue into the next fiscal year and thereafter to ensure that the hospital's suppliers meet their requirements with respect to forced labour and child labour.

For the 2024/2025 fiscal year, the hospital will create stricter agreement clauses outlining the necessity of the Act and require reporting from suppliers on the steps they are taking to ensure their supply chains are free of forced labour and child labour.

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

As of the end of the 2023-2024 fiscal year, Cornwall Community Hospital did not have any policies or due diligences relating to forced labour and child labour.

Policies 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.

**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)*

Cornwall Community Hospital has started the process of identifying risks, but this work is still on-going. To date, no gaps or specific risks have yet been identified. The Hospital will continue to work on identifying the risks of forced labour and child labour in supply chains, and determine the best way to manage and mitigate those risks.

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 eliminate future use of their products or services while being cognizant of any economic hardship that could ensue.

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

Cornwall Community Hospital 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)*

Cornwall Community Hospital 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)*

Cornwall Community Hospital has only a limited number of employees in the procurement department that is knowledgeable about the Act and its requirements. The employees are aware of the supplier attestation within the organization's tendering documents, the work ongoing with Champlain Health Supply Services (CHSS) and other shared service and group buying organizations and understand the importance of removing forced labour and child labour from supply chains.

Information sessions about the Act and the Hospital's obligations under the Act will be provided to the Hospital's management team. These information sessions will be scheduled to occur in fiscal 2024/2025.

**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*)

Cornwall Community Hospital 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 Cornwall Community Hospital. 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.

I certify that the Board of Directors of Cornwall Community Hospital has approved this Annual Report on the 30<sup>th</sup> day of May 2024.



Josée Payette

Chair of the Board

I have the authority to bind Cornwall Community Hospital.

Date:

May 30, 2024.