



ST. JOSEPH'S CARE GROUP

## ***PROCUREMENT & STRATEGIC SOURCING***

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# **Entity Report - Bill S-211 an Act to Enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act**

March 31, 2026

### **Prepared by**

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## Prelude

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Bill S-211 an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) imposes obligation on certain government institutions and private-sector entities to report on measures taken to prevent and reduce the risk that forced labour or child labour is used by them or in their supply chains.

This enactment also amends the Customs Tariff to allow for a prohibition on the importation of goods manufactured or produced, in whole or in part, by forced labour or child labour as those terms are defined in the Act.

This report outlines steps taken by St. Joseph’s Care Group (SJCG) to comply with the Act.

## About St. Joseph’s Care Group

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SJCG combines tradition and innovation in responding to the unmet needs of the people of Northwestern Ontario, offering a broad range of programs and services in Mental Health and Addictions, Rehabilitative Care, and Seniors’ Health in the City of Thunder Bay.

With over 2,500 staff, we pride ourselves on maintaining our core values of Care, Compassion, and Commitment. We are recognized as a leader in delivering safe, high-quality health care and have been accredited with Exemplary Standing, the highest level awarded by Accreditation Canada.

Our vast service area and culturally diverse client population includes many remote and isolated communities where access to specialized health services proves to be a challenge. To meet this need, SJCG discovers and implements new ways to deliver care through strong partnerships and innovative technologies, and we remain Northwestern Ontario’s regional lead for Rehabilitative Care, Behavioural Supports, Seniors’ Care, Rapid Access Addiction Medicine, and Palliative Care.

## Responses to Reporting Requirements Under the Act

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### **Requirement (a) - SJCG Structure & Supply Chains**

SJCG is a non-profit health care provider operating as a limited corporation in the Province of Ontario, governed by its Board of Directors, under Business Number 108025859. SJCG falls within the prescribed definition of a reporting Entity under the Act.

In support of the services it provides, SJCG purchases a broad array of goods, services and construction, including the importation of goods & services. These purchased goods and services include but are not limited to: professional services, medical equipment and medical supplies, facility operation and maintenance services, office supplies, textiles and food products.

### **Requirement (b) - Policies and Due Diligence Processes**

The following processes are in place to respond to the real and potential adverse impacts of forced labour and child labour throughout our supply chain.

- Implementation of a Supplier Code of Conduct that reaffirms SJCG’s expectations of suppliers under the Act while doing business with SJCG.
- Procurement solicitation and contract documents include the following representations.
  - Solicitation Documents:  
“The Proponent warrants and attests that the goods and services that it proposes to provide to St. Joseph’s Care Group 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).”
  - Contract Documents:  
“The Supplier warrants and attests that the Goods and or Services provided under the contract are not the result of, and in no way include, forced labour or child labour (as such terms are defined in Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act).”
- Tabled the Act at the committee level within the organization as part of ongoing efforts to promote awareness, and identify our responsibilities under the Act. These committees include, but are not limited to:
  - Product Evaluation Committee;
  - Infrastructure Quality Committee; and
  - Accessibility Steering Committee.
- Consulted those third party professional service providers that conduct supply chain activities on behalf of SJCG ensuring they are knowledgeable of the Act and conduct supply chain activities in compliance with the Act on our behalf. These third party professional services providers include but are not limited to architectural and engineering services.
- Collaborated with public sector partners that conduct supply chain activities on our behalf to put in place the necessary processes, controls and validations that will ensure these supply chain activities are conducted in compliance with the Act. For example, a group purchasing organization annual statement of compliance was provided that includes:
  - A statement of Due Diligence;
  - Steps taken in the current period in compliance with the Act; and
  - Steps taken in the previous period in compliance with the Act.
- Implemented an enhanced supplier vetting and pre-qualification process that takes into account the Act.
- Regularly participate in Environmental Social Governance (ESG) forums with supply chain peers. These forums focus on:

- Sustainability practices - prioritizing environmental sustainability;
  - Social responsibility; and
  - Creating long-term value while maintaining a positive impact on the communities we serve.
- Implemented processes to identify high risk supply chain categories and control processes to manage risk in these categories.

### **Requirement (c) – Forced Labour & Child Labour Risks**

In 2024-25, a review of our supply chain was conducted to identify risks of forced labour and child labour. The review was conducted in collaboration with our supply chain partners including group purchasing organizations, shared services organizations & supply chain associations.

The review included a broad range of supply chain categories including professional services, medical equipment and medical supplies, facility operation and maintenance services, office supplies, textiles and food products.

Based on the findings of the review no categories were identified as presenting unmanageable risk.

### **Requirement (d) – Remediation Measures**

No remediation measures have been required during this reporting period.

### **Requirement (e) – Remediation of Loss Income**

SJCG has not been made aware of any instances where forced labour or child labour exists in our current supply chains. Should such instances come to light, the appropriate response and remedy will be applied pursuant to the Act.

### **Requirement (f) – Training**

Targeted training regarding the Act was conducted during the reporting period. The training focused on identifying forced labour issues and provided guidance to support the escalation and resolution of issues of non-compliance with the Act. The training included those participating in the supply chain deemed to be at greatest risk of encountering issues covered by the Act. In addition to staff in the purchasing function, training was made available to individuals that have a decision-making role in the procurement of goods and services. The training was delivered in partnership with our supply chain partners and supplemented with internal training resources.

Material covered through training included:

- Clarity regarding our obligations under the Act;
- Tools to identify forced labour and child labour in procurement processes;
- Guidance on crafting effective procurement documents and processes that prevent contracting with suppliers involved in forced labour and child labor; and
- Resources to support individuals to manage and escalate issues where incidents of forced or child labour are discovered.

## **Requirement (g) – Assessing Effectiveness**

SJCG will continue to collaborate with the following authorities to measure and assess our effectiveness in ensuring that forced labour and child labour are not part of our procurement and contracting processes.

- **Provincial public sector authorities:** SJCG will engage Provincial authorities that issue directives and procurement tools that support compliance with the Act.
- **Federal agencies:** Having jurisdiction over the Act, SJCG acknowledges the federal government oversees enforcement agencies that play a critical role in enforcement of the Act (i.e. Canada Border Services Agency).
- **National and international monitoring / reporting agencies:** SJCG will engage procurement sector associations that play a critical role in the education and training of our procurement professional.

SJCG will work with those stakeholders and partners that conduct procurement activities on our behalf to ensure that they have in place the appropriate policies, processes, tools and systems to conduct the procurement processes in compliance with the Act, including an annual attestation validating same.

## **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 period listed above.

Full name: Susan Fraser

Title: Board Chair

Date: April 15, 2026

Signature: 

I have the authority to bind St. Joseph's Care Group