

# **Fighting Against Forced Labour and Child Labour in Supply Chains Act**

## **Statement Against Forced and Child Labour in Supply Chains**

**Trillium Health Partners**

**Report and Attestation  
Fiscal Year Ended March 31, 2026**

# Table of Contents

---

<b>Executive Summary</b>	<b>03</b>
<b>Section 1: Structure, Activities and Supply Chains</b>	<b>04</b>
<b>Section 2: Policies and Due Diligence Processes</b>	<b>06</b>
<b>Section 3: Risks and Management of Risks</b>	<b>08</b>
<b>Section 4: Remediation of Risks</b>	<b>12</b>
<b>Section 5: Remediation of Loss of Income to Vulnerable Families</b>	<b>12</b>
<b>Section 6: Training and Communication Provided to Employees</b>	<b>12</b>
<b>Section 7: Assessing Effectiveness</b>	<b>13</b>
<b>Attestation</b>	<b>14</b>
<b>Documents Referenced in This Report</b>	<b>15</b>



## Executive Summary

Trillium Health Partners is one of the largest community-based hospital systems in Canada. Comprised of Credit Valley Hospital, the Mississauga Hospital, and the Queensway Health Centre, Trillium Health Partners serves the growing and diverse populations of Mississauga, West Toronto, and surrounding communities. With more than 17,000 members of Team THP, the organization is dedicated to reducing inequities and improving health outcomes in the community. With a vision of a new kind of health care for a healthier community, our Plan to 2030 charts a course to improve quality for better access, outcomes and experiences.

**Trillium Health Partners is committed to operating with integrity and high ethical standards, including respecting human rights in all aspects of our supply chain.**

Trillium Health Partners upholds these commitments through its Code of Conduct, Professional Staff Code of Conduct, and Respectful Workplace policies. The organization aspires to create a healthy, safe, and respectful healing environment grounded in our core values of compassion, excellence, and courage.

The organization is required to comply with various legislative requirements, including the Public Hospitals Act, the Ontario Human Rights Code, and the Employment Standards Act, 2000. The organization embraces the enactment of Bill S-211: the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") and is committed to complying with its provisions.

This annual report, prepared in compliance with Section 11 of the Act for the fiscal year ending March 31, 2026, outlines the organization's key activities related to this legislation. The report is publicly available for viewing and download on our website and has been submitted to Public Safety Canada for inclusion in their searchable catalogue.

**“ Trillium Health Partners commits to continually exploring opportunities to enhance supply chain transparency and to strengthen its policies and training programs for its employees. ”**



## **Section #1:**

### ***Structure, Activities and Supply Chains***

Trillium Health Partners is governed by a Board of Directors and operates three main hospital sites: Credit Valley Hospital, Mississauga Hospital, and the Queensway Health Centre. As a teaching hospital affiliated with the University of Toronto, Trillium Health Partners offers a full range of acute care services as well as a variety of community-based, specialized programs.

#### **Core Activities:**

- **Patient care:** The hospital provides a wide range of health care services, including emergency care, surgeries, diagnostic imaging, rehabilitation, mental health services, and specialized treatments. A strong emphasis is placed on quality assurance throughout the supply chain, conducting rigorous inspections, testing, and monitoring to ensure that products meet safety and efficacy standards. Collaboration with suppliers and stakeholders is key to maintaining high standards of quality and patient safety.
- **Education and research:** As an academic health sciences centre, Trillium Health Partners is actively involved in medical education and research, collaborating with academic institutions to advance health care knowledge and train future health care professionals.

#### **Supply Chain Overview:**

THP's supply chain encompasses a range of activities and processes from the acquisition of medical supplies and equipment, to the delivery of patient care. The key components of THP's supply chain include:

- **Purchasing and procurement:** Trillium Health Partners sources medical supplies, equipment, pharmaceuticals, and other necessary items and services. The majority of our required goods and services are procured from Canadian organizations, though some products may be sourced internationally depending on type and availability. Most procurement activities, including supplier identification and qualification, are managed by Mohawk Medbuy Corporation ("MMC"), a reporting entity under the Act. The organization also uses the HealthPro purchasing group on occasion. Additionally, products are procured for its retail pharmacy and gift shops directly.
- **Importing of goods:** Some goods are imported such as medical equipment, devices, or parts using customs brokers and acts as the Importer of Record. The value of imported goods constitutes less than 1% of our overall operational non-salary expenses.

- **Distribution and logistics:** The hospital's internal distribution network ensures timely delivery of goods to various departments and sites within the organization.
- **Production of goods:** A small number of custom-made hand splints at the hospital's disability management and rehabilitation services department are produced. These splints are created and fitted on-site by occupational therapists who are part of Team THP.
- **Sales of goods:** The organization manages multiple retail pharmacies and gift shops at its sites. Items sold in these locations are purchased from local distributors.

## Section #2: *Policies and Due Diligence Processes*

Trillium Health Partners adheres to several provincial and regional legislative frameworks, including the Ontario Human Rights Code and the Employment Standards Act. In addition, the organization has established internal policies and procedures to ensure that its operations are aligned with best practices and regulatory requirements pertaining to human rights. These commitments are reflected in the organization's Code of Conduct, Professional Staff Code of Conduct, and Respectful Workplace policies.

### Guiding Legislation and Policies

The following legislation and policies guide Trillium Health Partners' approach:

- **The Employment Standards Act, 2000**, which protects employees and sets minimum standards for most workplaces in Ontario, including but not limited to minimum wage, hours of work and overtime, public holidays, vacation time and pay, leaves of absence, termination notice and pay.
- **The Ontario Human Rights Code**, which prohibits actions that discriminate against people based on a protected ground in a protected social area.
- **Code of Conduct:** This policy applies to all members of Team THP including employees, professional staff, volunteers, students, learners, independent and external contract workers, and all individuals who represent Trillium Health Partners. It provides a set of principles, rules, and ethical standards to guide the day-to-day conduct of hospital operations, grounded in compliance with all relevant laws, support for our mission and values, alignment to our Plan to 2030, high standards of business and ethical conduct, action in good faith, and the right of individuals to raise concerns without fear of reprisal.
- **Professional Staff Code of Conduct:** This policy promotes respectful interactions, defines disruptive behaviour, encourages prompt remediation, and promotes fairness, transparency, and accountability in the behaviour management and remediation process.
- **Respectful Workplace Policy:** This policy provides the overarching structure to support our Respectful Workplace program, supplemented by the our Declaration of Respect, Code of Conduct, workplace violence prevention, and respectful behaviour by patients, families and visitors policies.

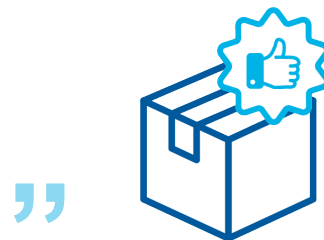
## Supply Chain Due Diligence

The importance of environmental sustainability and responsible business practices is reflected in Trillium Health Partners' sourcing documents through MMC, which include specific questions on Environmental, Social, and Governance ("ESG") practices of prospective providers. In response, suppliers describe their organizational practices, including managing social matters in the areas of human rights, health and safety, employee relations and engagement, and community relations.

Key due diligence measures include:

- Effective January 1, 2024, MMC included language in its competitive procurement templates (e.g., RFPs) requiring suppliers bidding for hospital business to attest that they do not use forced labour or child labour.
- Effective January 1, 2024, MMC included a new provision within the Representations and Warranties section of its standard Supplier Agreements that prohibits the use of forced and/or child labour. Where MMC's standard contract template is used, suppliers must confirm that the goods and any services provided by them are not the result of, and in no way involve, forced labour or child labour.
- Trillium Health Partners acknowledges and complies with the amendment of the Customs Tariff Act, which allows for a prohibition of imported goods manufactured or produced, in whole or in part, by forced labour or child labour as defined in the Act.
- During fiscal year 2024/25, Trillium Health Partners added a new provision to its Sourcing Policy describing the Act and emphasizing its compliance with and commitment to the Act.

**“ Suppliers must confirm that the goods and any services provided by them are not the result of, and in no way involve, forced labour or child labour. ”**



## **Section #3:**

### *Risks and Management of Risks*

Trillium Health Partners has conducted various risk assessments to identify parts of its operations and supply chains that might carry a risk of forced labour or child labour. The following actions have been carried out, some with the assistance of MMC:

- Mapped activities and supply chains
- Conducted an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Gathered information on worker recruitment and maintained internal controls to ensure that all workers are recruited voluntarily
- Developed and implemented due diligence policies and processes for identifying, addressing, and prohibiting the use of forced labour and/or child labour
- Developed and implemented anti-forced labour and/or child labour contractual clauses
- Ongoing monitoring of suppliers
- Developed and implemented grievance mechanisms to address complaints in the workplace
- Developed and implemented training and awareness materials on forced labour and/or child labour with supply chain partners
- Engaged with experts and other stakeholders on the issue of addressing forced labour and/or child labour

In addition, during fiscal year 2025/26, Trillium Health Partners initiated and conducted an internal audit on the steps undertaken to prepare the annual report and attestation in compliance with the Act. Our current report and attestation reflect the results and recommendations of that audit.

As of today, the organization has not identified and has not been made aware of any instances of forced labour or child labour within its operations or supply chains. The organization acknowledges, however, that inherent risks exist within the health care sector due to the complexity and diversity of goods and services required, with heightened risk arising from engagement with external suppliers and manufacturers operating across global regions with varying labour laws, enforcement, and governance.

## **Sourcing and Procurement**

The majority of Trillium Health Partners' sourcing and procurement activities are managed by MMC, a reporting entity under the Act. The HealthPro purchasing group is also used occasionally. Both organizations have issued formal letters confirming their due diligence and compliance with the Act. Per these letters, at the time of this report, none of the organization's shared services sourcing and purchasing organizations are aware of any instances where forced labour or child labour exists in current supply chains.

## **Transparency and Due Diligence (MMC)**

During the current fiscal year, MMC has undertaken the following steps to maintain strong compliance with the Act:

### ***Contractual Framework***

MMC includes a provision within the Representations and Warranties section of its standard Supplier Agreements that prohibits the use of forced and/or child labour. Where MMC's standard contract template is used, suppliers must confirm that the goods and services provided by them are not the result of, and in no way involve, forced labour or child labour. Competitive procurement templates also include language requiring suppliers to attest that they do not use forced labour or child labour.

### ***Supplier Due Diligence During the Sourcing Process***

Many suppliers that respond to MMC procurements have a long history of working with them. When new suppliers respond, MMC thoroughly reviews their responses to the attestation and Agreement redlining to ensure compliance with the Act. If MMC is advised of any suspicious activity, it is thoroughly investigated. If a supplier is found to not be adhering to the law, they will be eliminated from the procurement and any future procurements until they can demonstrate compliance.

### ***Supplier Engagement***

MMC engages suppliers through annual business reviews and ad hoc communications to share their ESG supply chain risk management efforts, including ESG risk assessments and their compliance activities under the Act.

### ***Formal Grievance Mechanism***

Employees, contractors, and suppliers must report any suspected irregularity as early as possible. MMC's third-party Whistle Blower Reporting Line operates 24 hours a day, seven days a week, 365 days a year. It is a confidential and anonymous external service available to employees and other third parties (e.g., contractors and suppliers) to make a good-faith report about suspected irregularities.

### ***Supplier ESG Risk Management***

MMC conducted a Supplier ESG Risk Assessment for the Reporting Period, covering 34 suppliers (representing approximately 70% of MMC's total contracted spend). The assessment reviewed supplier disclosures on unethical labour practices, environmental violations, overall regulatory compliance, and supply chain risk management practices. From the suppliers sampled, there were no reported violations under the Act. MMC intends to expand the Supplier ESG Assessment next fiscal year to cover 90% of contract spend.

### ***Supplier Standards***

An "MMC Supplier Standards" document (Supplier Code of Conduct) has been developed to further reinforce the expectations and obligations of suppliers in meeting ethical, social, environmental, and governance requirements, including the elimination of forced labour and child labour. These standards are planned for implementation in 2026 and are currently undergoing legal review, with a phased rollout beginning with MMC's top suppliers.

### **Direct Purchases**

In addition to procurement activities overseen by Trillium Health Partners' shared service organizations, the hospital also conducts direct purchases to support retail pharmacies and gift shops. Given the overall operational expenses of the hospital, the value of these directly purchased goods is minimal.

Considering the complexity and scope of our operations, the organization recognizes inherent limitations in its ability to fully control or observe upstream supply chain activities. Accordingly, further analysis and assessment are required to identify and implement enterprise-wide controls and due diligence measures appropriately tailored to specific procurement activities, contract types, or supplier groups.

### **Importing of Goods**

Trillium Health Partners imports some goods, such as medical equipment, devices, or parts, using customs brokers and acts as the Importer of Record. Given the overall operational expenses of the hospital, the value of goods that the organization imports is deemed "very minor dealings" and is interpreted in accordance with generally accepted principles of de minimis.

### **Distribution and Logistics**

Distribution and logistics of goods at the organization is an internal process, managed by hospital employees who are protected by various employment and human rights policies, as described in Section 2 of this report.

**Production of Goods**

A small number of custom-made hand splints are produced at the organization's disability management and rehabilitation services department. The hand splints are created and fitted on-site by occupational therapists, all of whom are part of Team THP.

**Sale of Goods**

Trillium Health Partners sells goods to the public through its retail pharmacies and gift shops. The assessment of purchasing processes for these areas included a review of vendors and reasonable inquiries of the staff responsible for purchases.

As of the date of this report, the organization has not identified and has not been made aware of any instances where forced labour or child labour exists.

## **Section #4:** *Remediation of Risks*

Trillium Health Partners has exercised due diligence to assess its supply chains and activities. To date, no areas of risk requiring remediation have been identified.

## **Section #5:** *Remediation of Loss of Income to Vulnerable Families*

Trillium Health Partners has exercised duty of care and due diligence to assess its supply chains and activities. To date, no areas of risk have been identified that would require measures resulting in the loss of income to vulnerable families.

## **Section #6:** *Training and Communication Provided to Employees*

The hospital's shared service organization, MMC, has implemented ESG training for both current and onboarding MMC employees. The training includes a module on the Fighting Against Forced Labour and Child Labour in Supply Chains Act, which provides guidance on required contract language and emphasizes that this language must not be removed during contract negotiations.

---

**“ Compliance with Bill S-211 is not a checkbox—it is a commitment to ethical responsibility that Trillium Health Partners takes seriously. ”**

---

The organization has incorporated a module addressing the Act into its online learning platform. The training is mandatory for all active staff and learners and must be completed annually.

In addition, existing leadership training on public procurement processes was updated to reflect the applicable requirements of the Act. This training is delivered on a quarterly basis to all leaders, and the updated version is planned for implementation in fiscal year 2026/27.

This education supports our Plan to 2030 by strengthening a culture of accountability, integrity, and continuous learning.

## **Section #7:** ***Assessing Effectiveness***

The measures of fighting against forced labour and child labour in supply chains are complex, evolving, and require ongoing and continuous processes.

Trillium Health Partners is committed to continuing to conduct supply chain mapping exercises to identify the risk of forced labour and child labour at each stage of its supply chain and to address them where needed. This ongoing work aligns with the organization's Plan to 2030 and reflects the commitment to continuous improvement in ethical and responsible supply chain practices.

The organization's shared services sourcing and purchasing organizations are equally committed to sustaining ongoing and continuous improvements in their activities related to this legislation, including training for those in sourcing and supply chain roles.

---

**“ The measures of fighting against forced labour and child labour in supply chains are complex, evolving, and require ongoing and iterative processes. Trillium Health Partners is committed to continue to conduct supply chain mapping exercises to identify the risk of forced labour and child labour at each stage of its supply chain and to address them, where needed. ”**

---

*Prepared in accordance with the requirements of the "Fighting Against Forced Labour and Child Labour in Supply Chains Act" (the "Act") and in particular Section 11.*

**TO:** The Board of Trillium Health Partners, (the "Board")

**FROM:** Karli Farrow  
President & Chief Executive Officer  
Trillium Health Partners

**Date:** May 31, 2026

**REPORTING PERIOD:** April 1, 2025, to March 31, 2026

---

On behalf of Trillium Health Partners, I attest that I have reviewed the information contained in the report for the entity 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.



**Karli Farrow**  
**President and Chief Executive Officer**  
Trillium Health Partners

May 31, 2026

I have the authority to bind Trillium Health Partners

I certify that this attestation has been approved by the Board of Trillium Health Partners on May 31, 2026.



**Adam C. Burke**  
**Board Treasurer**  
Trillium Health Partners

## Documents referenced in this report:

1. Code of Conduct Policy, Trillium Health Partners, version 1.9
2. Professional Staff Code of Conduct Policy, Trillium Health Partners, version 1.4
3. Respectful Workplace Policy, Trillium Health Partners, version 1.4
4. Ontario Human Rights Code, Ontario Human Rights Commission
5. Employment Standards Act, 2000, S.O. 2000, c. 41, Government of Ontario
6. Proponent Confirmation Form – RFP, March 2025, Mohawk Medbuy Corporation
7. Representations, Warranties, Covenants, Master Template Agreement, MMC, October 30, 2025
8. Mohawk Medbuy Corporation, Bill S-211 Letter to Members, dated March 2, 2026
9. HealthPro Compliance Letter, dated April 21, 2026