



## Report on Forced Labour and Child Labour in Canadian Supply Chains – 2026

**Reporting entity's legal name:** Haliburton Highlands Health Services Corporation

**Financial reporting year:** April 1, 2025, to March 31, 2026

**Identification of a revised report:** N/A

**Business number:** 899105035RR0001

**Identification of a joint report:** N/A

**Identification of reporting obligations in other jurisdictions:** N/A

**Entity categorization according to the Act:** Entity (Hospital)

**Sector/industry:** Public Sector / Health Care

**Location:** Haliburton County, Ontario

### Organization Overview

Haliburton Highlands Health Services Corporation (HHHS) is a non-share capital entity incorporated in 1996 under the *Ontario Not For Profit Corporations Act* #1165873 and a registered Canadian Charity #1076710-10 governed by a volunteer Board of Directors. HHHS, led by an executive team of a Chief Executive Officer, Chief Nursing Executive, Chief Financial Officer and Chief of Medical Staff manage leaders, staff, volunteers, students and physicians.

HHHS' mandate or objects are to establish and operate a public hospital, ancillary facilities and services, long-term care facilities and other health related services; to promote and participate in education; and to promote and support research activities. HHHS has over 400 employees and 200 volunteers across the two main campuses located in Minden and Haliburton, Ontario.

HHHS delivers high-quality health services to residents, cottagers, and visitors to Haliburton County and the surrounding area. HHHS strives to be leaders in innovative rural health care, and works closely with local and regional partners to promote wellness and provide access to essential health services, including Primary Care, Hospital (Acute Inpatient and Emergency Care at the Haliburton site), Long-Term Care, End-of-Life Care, Mental Health & Addictions Services, and Community Support Services.

HHHS is an integral part of the Kawartha Lakes Haliburton Ontario Health Team. By working co-operatively with other healthcare providers, HHHS can maximize its efficiencies, reduce costs and support the people of the area through education about their health and access to the health services they require within the region.

### Structure, Activities and Supply Chains

HHHS conducts procurement activities in accordance with its Procurement Controls and Process policy and Purchasing Code of Ethics policy, as well as relevant directives and trade agreements, including but not limited to:

- Broader Public Sector Procurement Directive



- Canadian Free Trade Agreement
- Canada-European Union Comprehensive Economic and Trade Agreement

Most goods and services purchased by HHHS are from suppliers that are Canadian businesses or businesses with Canadian fulfillment addresses. For the reporting period of April 1, 2025, to March 31, 2026, HHHS did not directly import any goods.

### **Policies and Due Diligence**

HHHS purchases contract management and supply chain management services through Mohawk Medbuy Corporation (MMC), a national, not-for-profit, shared services organization supporting Canadian hospitals and health care providers to drive value, efficiencies, and cost savings on the supplies and services they use. HHHS conducts annual training for the leadership team regarding procurement practices and policy expectations.

All procurements with a total cost of ownership more than \$121,200 are supported by MMC. Procurements below \$121,200 are decentralized, however, HHHS incorporates review processes to ensure compliance with HHHS' schedule of authorities. In cases where policy has not been followed, and the goods have already been received, services rendered, or a contract executed, the procurement specialist uses the opportunity to educate regarding policy requirements to reduce the risk of recurrence.

Where public competitive procurement is required, HHHS engages in fair, open, and transparent processes. HHHS also leverages collaborative procurement opportunities and vendor of record arrangements such as those available through MMC, HealthPro, Silver Group Purchasing or Supply Ontario, to increase efficiencies and achieve economies of scale.

Examples of goods and services procured by HHHS to support operations include but are not limited to:

- Various medical and surgical supplies
- Laboratory supplies
- Food and beverage products
- Various information technology products, services, and electronics
- Housekeeping supplies
- Medical equipment
- Furniture and fixtures
- Maintenance operating supplies and services
- Paper and office supplies
- Patient transportation services
- Waste management services

HHHS' procurement policies are actively being updated to specifically address forced labour or child labour. HHHS commits to continuing the work to update its policies accordingly.

### **Areas of Risk**

Based on a high-level environmental scan of HHHS' supply chain, HHHS is not aware of the use of forced labour or child labour for the goods imported into Canada directly, however, there is potential for gaps in our assessment. Although Canadian businesses or businesses with Canadian addresses form the majority of suppliers for HHHS, there is a potential risk of forced labour and/or child labour further down the supply



chain of our suppliers. At present, we are currently not aware of the use of forced labour or child labour in our supply chain.

**Steps taken over last fiscal year to reduce risk of forced and child labour**

Last year, HHHS collaborated with our procurement and supply chain partners, MMC, HealthPRO, and Silver Group Purchasing (SGP), to implement policy changes aimed at mitigating risks associated with the use of forced and child labour.

MMC, HealthPRO, and SGP have incorporated these policy changes into their operational practices and continue to actively assess and comply with all applicable legislative requirements. This includes ongoing education and awareness measures integrated throughout our procurement processes.

Since the completion of this review, our providers have continued to monitor legislative developments and maintain compliance with evolving regulatory obligations.



## Bill S211, Fighting Against Forced Labour and Child Labour in Supply Chains Act

### APPROVAL AND ATTESTATION

**From:** The Board of Directors (the “Board”) of the Haliburton Highlands Health Services Corporation (the “HSP”)

**Date:** May 28, 2026

**Re:** April 1, 2025 – March 31, 2026 (the “Applicable Period”)

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In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for Haliburton Highlands Health Services Corporation. Based on our knowledge, and having exercised reasonable diligence, we 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.

A handwritten signature in cursive script that reads 'I Odell'.

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Irene Odell, Board Chair

Haliburton Highlands Health Services Corporation