

BILL S-211 – ANNUAL REPORT

ST. JOSEPH’S HEALTH CARE LONDON

Approved by the Board of Directors May 25, 2026

St. Joseph’s Health Care London (St. Joseph’s) is committed to responsible procurement practices and reducing the risk of forced labour and child labour in supply chains, in alignment with Bill S-211: *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (the “Act”).

St. Joseph’s procurement and supply chain functions continue to be managed by Healthcare Materials Management Services (HMMS), a joint venture that St. Joseph’s operates with London Health Sciences Centre. HMMS supports St. Joseph’s by administering procurement processes, competitive sourcing and contract management in accordance with St. Joseph’s policies. St. Joseph’s maintains corporate procurement policies and practices designed to support ethical procurement and legislative compliance, including a supply chain code of ethics, which establish expectations for ethical conduct and legislative compliance in the procurement of goods and services.

As previously reported, St. Joseph’s implemented procurement and contractual controls in response to the act that continue to be applied. These include standard contract and purchase order terms requiring suppliers to warrant that goods and services provided are not produced using forced labour or child labour, as defined under the Act. In addition, competitive procurement templates, such as Requests for Proposal, require prospective suppliers to attest that the goods and services they propose to supply comply with these requirements. These measures embed forced labour and child labour considerations into supplier selection processes as well as ongoing vendor relationships.

St. Joseph’s has undertaken a qualitative, risk-based assessment of its supply chain activities within the context of its role as a healthcare provider. The organization’s procurement profile primarily consists of regulated medical supplies and equipment, pharmaceuticals, and operational goods and services sourced largely from established domestic or multinational suppliers. These goods are typically procured through public-sector competitive procurement processes or group purchasing arrangements. Based on the nature of the goods and services procured, supplier characteristics, and existing procurement governance controls, St. Joseph’s considers the overall risk of forced labour or child labour within its direct supply chains to be low. Potential higher-risk

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exposures, such as goods manufactured through global supply chains, are addressed through supplier warranties, standardized procurement documentation, and established contract management practices administered through HMMS.

Ongoing awareness of supplier compliance is supported through existing procurement governance processes and contractual mechanisms. Staff and leaders involved in procurement-related activities are informed of relevant contractual requirements and procurement expectations through updates to procurement templates, contract terms, and operational practices administered by HMMS. Should information arise indicating a potential forced labour or child labour risk associated with a supplier or product, St. Joseph's would rely on contractual rights, procurement governance processes, and engagement through HMMS to assess and respond appropriately, which may include supplier engagement, contractual remedies, or further escalation where warranted.

Training and awareness related to the Act are embedded within routine procurement operations rather than delivered through separate standalone training programs. This role-based approach ensures that staff and leaders supporting procurement and contract management activities remain aware of relevant legislative requirements and associated procurement controls in a manner proportionate to their responsibilities.

St. Joseph's assesses, at least annually, the appropriateness and effectiveness of its procurement policies, processes, and controls, including compliance with applicable legislation. Where necessary, formal reviews of relevant corporate policies are undertaken to support continuous improvement and alignment with evolving guidance and regulatory expectations. As of the date of this report, neither St. Joseph's nor HMMS has identified any instance in which forced labour or child labour has been found to exist within St. Joseph's supply chains.

Since the prior reporting year, St. Joseph's has continued to refine its understanding of forced labour and child labour risks as they relate to hospital supply chains and has further embedded consideration of the Act into regular procurement governance and contract management practices administered through HMMS. While the organization's core controls and risk profile remain appropriate, St. Joseph's continues to monitor guidance and expectations related to the Act and will evolve its approach over time in a manner that is proportionate to its operations and risk exposure.

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 reporting year listed above.

original signed

Roy Butler
President and Chief Executive Officer
St. Joseph's Health Care London

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