



# KEMPTVILLE DISTRICT HOSPITAL

*Building healthier communities*

## Bill S-211 Fighting against forced labour and child labour in supply chains

Attestation by the Board of Directors on the Bill S-211 Annual Report

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### *Kemptville District Hospital*

Entity: Kemptville District Hospital  
2675 Concession Road, Kemptville, Ontario, Canada, K0G 1J0  
For the Fiscal Year April 1, 2023 – March 31, 2024  
Business Number: 107562514

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.

This report received approval from the executive committee of the Board of Directors of Kemptville District Hospital on May 22, 2024.

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**Full name:** Jeff Nolan  
**Title:** Chair of the Board  
**Date:** May 22, 2024  
**Signature:** 

I have the authority to bind Kemptville District Hospital



# Bill S-211 Annual Report

## *Kemptville District Hospital*

For the Fiscal Year April 1, 2023 – March 31, 2024

**1. This report is for which of the following?** Entity

**2. Legal name of reporting entity or government institution:** Kemptville District Hospital

**3. Financial reporting year:** April 1, 2023 – March 31, 2024

**4. Is this a revised version of a report already submitted this reporting year?** No

**4.1 If yes, identify the date the original report was submitted.** N/A

**4.2 Describe the changes made to the original report, including by listing the questions or sections that were revised (1,500 character limit).** N/A

**5. For entities only: Business number(s) (if applicable):** 107562514

**6. For entities only: Is this a joint report?** No

**6.1 If yes, identify the legal name of each entity covered by this report.** N/A

**6.2 Identify the business number(s) of each entity covered by this report (if applicable).** N/A

**7. For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?** No

**7.1 If yes, indicate the applicable law(s). Select all that apply.** N/A

**8. For entities only: Which of the following categorizations applies to the entity? Select all that apply.**

- Listed on a stock exchange in Canada: No
- Canadian business presence (select all that apply):
  - Has a place of business in Canada: Yes
  - Does business in Canada: Yes
  - Has assets in Canada: Yes
- Meets size-related thresholds (select all that apply):
  - Has at least \$20 million in assets for at least one of its two most recent financial years: Yes
  - Has generated at least \$40 million in revenue for at least one of its two most recent financial years: No
  - Employs an average of at least 250 employees for at least one of its two most recent financial years: Yes

**9. For entities only: Which of the following sectors or industries does the entity operate in? Select all that apply.**

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- **Health care and social assistance**
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- Other, please specify:

**10. For entities only: In which country is the entity headquartered or principally located?**  
Canada

**10.1 If in Canada: In which province or territory is the entity headquartered or principally located?** Ontario

**11. For government institutions only: Is this a report for a federal Crown corporation or a subsidiary of a federal Crown corporation?** No

**11.1 If yes, which of the following sectors or industries does the Crown corporation or subsidiary operate in? Select all that apply.** N/A

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries

- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- Other, please specify:

**11.2 If yes, in which province or territory is the Crown corporation or subsidiary headquartered or principally located? N/A**

## Annual Report

### Reporting for entities

**1. What steps has the entity taken in the 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 in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply.**

- **Mapping activities**
- Mapping supply chains
- **Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains**
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- **Developing and implementing an action plan for addressing forced labour and/or child labour**
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- **Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour**
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains

- Developing and implementing child protection policies and processes
- Developing and implementing anti-forced labour and/or -child labour contractual clauses
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Auditing suppliers
- **Monitoring suppliers**
- **Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour**
- Developing and implementing grievance mechanisms
- Developing and implementing training and awareness materials on forced labour and/or child labour
- Developing and implementing procedures to track performance in addressing forced labour and/or child labour
- **Engaging with supply chain partners on the issue of addressing forced labour and/or child labour**
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour
- Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks
- Information not available for this reporting period
- Other, please specify:

**2. Please provide additional information describing the steps taken (if applicable) (1,500 character limit).**

- Mapping activities: Procurement staff conducted surveys of each departments purchasing activities and vendors that are based outside Canada.
- Assessment of Risks: Most suppliers have a Canadian branch and are accountable for importing ethically. Amazon accounts are a potential risk and now only procurement may buy from this vendor through the Canadian business account that meets ethical standards.
- Action Plan and Monitoring of Suppliers: KDH is implementing an action plan to transition to ethically responsible suppliers and eliminate dealings with problematic suppliers where possible. This includes the ongoing mapping and risk assessment of our suppliers, particularly those outside of Canada like Amazon and direct software providers, with a full risk review to be completed by Q4 of 2024/25. Despite limited resources, the MM team and the Procurement Mgr. are overseeing this initiative. Monitoring is conducted quarterly, and staff education is provided on ethical procurement through the Surge Learning Portal and in-person training, with updates provided via emails, newsletters, and management meetings. An annual review of this action plan is scheduled to assess effectiveness and make necessary adjustments.
- Corporation in remediation; KDH will cooperate with any suppliers that initiate remediation.
- Engaging partners: KDH is a member of CHSS, EORLA, and engages with Mohawk MedBuy, QCH, and Compass to develop and implement mitigation plans similar to the one at KDH.

**3. Which of the following accurately describes the entity's structure? Corporation**

**4. Which of the following accurately describes the entity's activities? Select all that apply.**

- Producing goods (including manufacturing, extracting, growing and processing)
  - in Canada
  - outside Canada
- Selling goods
  - in Canada
  - outside Canada
- Distributing goods
  - in Canada
  - outside Canada
- **Importing into Canada goods produced outside Canada**
- Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

**5. Please provide additional information on the entity's structure, activities and supply chains (1,500 character limit).**

KDH operates with 18 inpatient beds, 12 LTC beds, 8 surgical beds, and 10 ED bays, serving approximately 22,000 ED visits annually. We perform surgeries in General Surgery, Endoscopy, Orthopedics, Gynecology, and small volumes in other services. KDH hosts Clinics for 11 subspecialties. Annually, KDH manages about \$28M in expenses.

Our procurement processes are integrated with regional shared service organizations and provincial vendors of record, ensuring compliance with the Broader Public Sector Accountability Act (BPSAA). We engage in Requests for Proposals (RFPs) to maintain competitive and transparent procurement practices. KDH works closely with CHSS and Mohawk MedBuy for procurement support, optimizing our supply chain efficiency and aligning with best practices. We also leverage Queensway Carleton Hospital for procurement of medical and other supplies. This structured approach ensures responsible sourcing and adherence to legislative requirements.

For purchases of large equipment, KDH worked with suppliers directly to ensure ethical supply chain practices as much as possible.

**6. Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? Yes**

**6.1 If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply.**

- **Embedding responsible business conduct into policies and management systems**
- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts

- Tracking implementation and results
- Communicating how impacts are addressed
- **Providing for or cooperating in remediation when appropriate**

**7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500 character limit).**

- Embedding responsible business conduct into policies and management systems: KDH has added adherence to Bill S-211 to our procurement policy and explicitly state the KDH prohibits forced and child labor and this is embedded into our procurement and management systems. We conduct annual risk assessments and supplier inquiries to ensure compliance, and we ask all suppliers to verify adherence to labor laws and ethical standards and what their process is to ensure child and forced labour is not present in their supply chain. Our management system includes training for staff in fiscal year 2024-25 on these policies and a monitoring mechanism to ensure ongoing compliance. We actively engage with our suppliers and industry partners to enhance transparency and ethical practices across our operations.

**8. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

- Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.
- **Yes, we have started the process of identifying risks, but there are still gaps in our assessments.**
- No, we have not started the process of identifying risks.

**8.1 If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.**

- The sector or industry it operates in
- **The types of products it produces, purchases or distributes**
- The locations of its activities, operations or factories
- The types of products it sources
- The raw materials or commodities used in its supply chains
- Tier one (direct) suppliers
- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour
- The use of forced labour
- The use of child labour
- None of the above
- Other, please specify

**9. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply.**

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- **Manufacturing**
- Wholesale trade
- **Retail trade**
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- None of the above
- Other, please specify

**10. Please provide additional information on the parts of the entity’s activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit).**

KDH has a risk of forced and child labor in our supply chain, which includes medical supplies and equipment. Recognizing the complexity of tracing these risks due to indirect supply chains, we engage closely with our procurement partners—CHSS, Queensway Carleton Hospital (QCH), Mohawk MedBuy, Compass, and EORLA—who have implemented policies and procedures to mitigate these practices.

We ensure compliance through contractual obligations that require adherence to labor laws and ethical labor practices. Our procurement team undergoes training to identify and address potential risks in our supply chain.

**11. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

- Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.



- No, we have not taken any remediation measures.
- **Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.**

**11.1 If yes, which remediation measures has the entity taken? Select all that apply. N/A**

- Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support
- Compensation for victims of forced labour or child labour and/or their families
- Actions to prevent forced labour or child labour and associated harms from reoccurring
- Grievance mechanisms
- Formal apologies
- Other, please specify.

**12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit). N/A**

**13. Has the entity taken any measures 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? (Required)**

- Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.
- **Not applicable, we have 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 activities and supply chains.**

**14. Please provide additional information on any measures the entity has 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 (if applicable) (1,500 character limit). N/A**

**15. Does the entity currently provide training to employees on forced labour and/or child labour? No**

**15.1 If yes, is the training mandatory? N/A**

- Yes, the training is mandatory for all employees.
- Yes, the training is mandatory for employees making contracting or purchasing decisions.
- Yes, the training is mandatory for some employees.
- No, the training is voluntary.

**16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit).**

Training is being developed and implement for the FY 2024/25.

**17. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? No**

**17.1 If yes, what method does the entity use to assess its effectiveness? Select all that apply.**

N/A

- Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour
- Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
- Partnering with an external organization to conduct an independent review or audit of the organization's actions
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators
- Other, please specify.

**18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit). N/A**