



CONCORDIA HOSPITAL

ANNUAL REPORT FOR APRIL 1, 2025 – MARCH 31, 2026

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

Introduction

This annual report is in response to the requirement under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), that an “Entity” report on its activities to mitigate the risk of forced labour and child labour being employed within its supply chain and its activities.

Concordia Hospital (“Concordia”) determined it is an “Entity” as defined in the Act and therefore required to report on the organization’s activities to mitigate the risk of forced labour and child labour being employed within its supply chain and its activities.

The Act came into force on January 1, 2024. This annual report is the third completed pursuant to the Act by Concordia.

Structure

Concordia is comprised of Concordia Hospital, an acute care hospital funded for 168 beds as well as Concordia Place, a 140-bed personal care home. Concordia partners with health care agencies and providers to serve the community of northeast Winnipeg. Concordia is continued as a corporation under *The Concordia Hospital Incorporation Act* (Manitoba) and is a health corporation as defined in *The Health System Governance and Accountability Act* (Manitoba). Concordia operates under a service purchase agreement with the Winnipeg Regional Health Authority (the “WRHA”) wherein the WRHA agrees to provide funding to Concordia for the provision of certain health services.

Concordia Activities

Concordia has determined it is engaged in the production, importing, and distribution of goods as follows:

1. Food services:
 - a. Concordia provides an onsite meal service in Concordia Hospital and Concordia Place where Concordia staff heat pre-prepared meals and then distribute them to patients and residents.
2. Compounded medications:

- a. Concordia provides, but does not sell, compounded medications to patients while providing patient care. The WRHA through its Pharmacy Program operates licensed pharmacies in various Manitoba sites, including at Concordia, and compounds medications that are not sold but used for patient care at Concordia. The compounded medications are dispensed by the WRHA Pharmacy Program to the site staff, including Concordia staff, that provide them to patients.
3. Importing:
- a. Concordia relies on Shared Health's Supply Chain Management Shared Service ("SCMSS") to procure goods to support its clinical programs. SCMSS on behalf of Concordia purchases goods produced outside Canada from third party suppliers, where that third party is considered to be the importer for the purposes of the *Customs Act*, but Concordia understands such is not considered importing under the Act.
 - b. However, SCMSS on behalf of Concordia on as needed basis imports goods from distributors, with the assistance of a customs broker as needed, if the existing suppliers managed by SCMSS cannot provide the goods. This importing mostly applies to medical supplies and generally such is imported from the United States. Furthermore, Concordia on an as needed basis imports goods on its own behalf, and this importing also mostly applies to medical supplies.

Supply Chain Underlying Concordia Activities

Shared Health is designated as the provincial health authority pursuant to *The Health System Governance and Accountability Act* (Manitoba) and is responsible for providing certain shared administrative services to health corporations such as Concordia. SCMSS is an example of a shared administrative service under Shared Health and provides fully centralized purchasing activities for Concordia, leading the competitive bids processes and/or establishing contracts with suppliers.

Shared Health is an active member of HealthPRO which is a national group purchasing organization. Approximately 30% of Shared Health's goods and equipment contracts are committed to HealthPRO agreements and approximately 95% of Shared Health's pharmacy contracts are committed through HealthPRO agreements. Shared Health also works directly with the Procurement & Supply Chain division of the Government of Manitoba ("PSC") on collaborative procurement initiatives such as food and nutrition which was awarded in 2025.

CancerCare Manitoba ("CCMB") is designated as the cancer authority pursuant to *The Health System Governance and Accountability Act* (Manitoba) and cooperates with others, including Concordia, for the delivery of cancer-related health services.

SCMSS' responsibility for Concordia's activities are as follows:

- 1. For the onsite meal service, Concordia relies on the WRHA's Regional Distribution Facility to produce and then distribute the pre-prepared meals to Concordia Hospital and Concordia Place, that Concordia staff then heats and distributes to patients and residents. In 2025 PSC was responsible for leading the food and nutrition competitive bid processes and contracting with the selected supplier to supply/deliver the raw materials used by the

WRHA's Regional Distribution Facility to produce the pre-prepared meals. SCMSS assisted PSC to issue the food and nutrition competitive bid process but now relies on PSC to manage the contract with the selected supplier on behalf of Shared Health. A description of the direct and indirect suppliers that contribute goods/services to the goods produced and distributed through Concordia's onsite meal service and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.

2. Concordia relies on the WRHA's Pharmacy Program to compound medications that are not sold but used for patient care at Concordia. SCMSS infrequently is responsible to lead the competitive bid processes and/or contracting with suppliers for the raw materials used by the WRHA Pharmacy Program. For a majority of the WRHA Pharmacy Program's needs, the WRHA relies on HealthPRO to issue competitive bid processes for these raw materials and thereafter the WRHA enters a contract with the selected suppliers that are managed by HealthPRO. As described above, approximately 95% of the WRHA's pharmacy contracts are committed through HealthPRO. Furthermore, CCMB acquires cancer medications from suppliers and as required provides such to the WRHA Pharmacy Program for compounding. A description of the direct and indirect suppliers that contribute goods/services to the goods produced through the WRHA Pharmacy Program that are distributed accordingly by Concordia and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.
3. SCMSS, with the assistance of a customs broker, on an as needed basis imports goods for Concordia from a distributor if Concordia's existing suppliers that are managed by SCMSS cannot provide them. This importing mostly applies to medical supplies and generally such are imported from the United States. Furthermore, Concordia on an as needed basis imports goods on its own behalf, and this importing also mostly applies to medical supplies. A description of the direct and indirect suppliers that contribute goods/services to the goods imported by SCMSS on behalf of Concordia or by Concordia on its own behalf and a more detailed description of the source countries/regions of those goods/services, was not able to be ascertained for this annual report.

Steps Taken in Previous Financial Year (April 1, 2025 – March 31, 2026)

During the previous financial year, the Winnipeg Regional Health Authority ("WRHA") partnered with Shared Health to take steps 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 WRHA, including Concordia or good imported into Canada by Shared Health. Generally, these steps included:

1. Developing and implementing training and awareness materials on forced labour and/or child labour.

WRHA through SCMSS also took steps in the past financial year to prevent and reduce the risk that forced labour or child labour is used in the supply chains managed by SCMSS. However, these steps are not anticipated to address this risk in supply chains that contribute to any of Shared Health's activities. Generally, this included:

1. Developing and implementing anti-forced labour and/or child labour contractual clauses.

While not completed or implemented, in the past financial year WRHA through SCMSS took initial planning steps in addition to the above to address the risk in supply chains managed by SCMSS. Therefore, these steps when implemented may only address Shared Health's importing activities and other SCMSS managed supply chains and are not anticipated to address the risk in supply chains that contribute to Shared Health's food services or medication compounding activities. Generally, these initial planning steps were in relation to:

1. Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains;
2. Developing and implementing anti-forced labour and/or child labour standards, codes of conduct and/or compliance checklists; and
3. Monitoring suppliers.

Developing and implementing training and awareness materials on forced labour and/or child labour

Shared Health collaborated with a service provider to obtain training materials on forced labour and child labour, and these materials are offered to SCMSS staff who are sited at Concordia Hospital. Three (3) basic online training modules are now available on WRHA's learning management system, which will be mandatory for all SCMSS staff and voluntary for other Shared Health staff. In the past financial year, all SCMSS staff and select Shared Health Capital Planning staff completed the three (3) basic online training modules. Furthermore, SCMSS through its subscription with the service provider has access to additional training and workshops such as Tariffs, Trade Agreements, Incoterms and Forced Labour which was attended by select SCMSS staff responsible for contracting with suppliers.

Developing and implementing anti-forced labour and/or child labour contractual clauses

SCMSS developed anti-forced labour and/or child labour contractual clauses to include in new contracts entered into pursuant to its competitive bid processes. In late March 2026 these contractual clauses were implemented into SCMSS' template contracts.

Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

SCMSS is in the process of planning a two (2) phase risk assessment of its suppliers. However, the risk assessment was not completed or implemented in the past financial year and when implemented it may only affect the supply chains managed by SCMSS.

The initial phase is expected to include basic research and screening using publicly available databases to identify suppliers operating in high-risk geographies or industries. The second phase is expected to include distributing a comprehensive supplier questionnaire and conducting a "tail spend" risk assessment to identify and map suppliers not engaged through a competitive bid process. It is anticipated that high risk suppliers identified through the tail spend risk assessment would be prioritized for further screening or onboarding to a competitive bid process.

Developing and implementing anti-forced labour and/or child labour standards, codes of conduct and/or compliance checklists

SCMSS is in the process of developing a supplier code of conduct. However, the supplier code of conduct was not finalized or implemented in the past financial year and when implemented it may only affect the supply chains managed by SCMSS.

Monitoring suppliers

As part of its two (2) phase supplier risk assessment, SCMSS is in the process of planning an ongoing monitoring and reporting process, which is expected to include establishing mechanisms for incident reporting/whistleblower channels and annual risk reviews/supplier score cards. However, the ongoing monitoring and reporting process was not finalized or implemented in the past financial year and when implemented it may only affect the supply chains managed by SCMSS.

Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

Concordia currently does not have any policies or due diligence processes (as described in the *OECD Due Diligence Guidance for Responsible Business Conduct*) in place related to forced labour or child labour. However, Concordia has implemented/is planning/or relies on its partners for some other due diligence processes, and while not policies, Concordia has hiring procedures that are designed to maintain compliance with federal immigration legislation.

SCMSS previously developed a scored question for its competitive bid processes that require proponents that meet the Act's definition of "Entity" to provide their public facing commitment to eliminate forced labour and child labour and steps they have taken to ensure its supply chain is free from forced labour and child labour. This scored question was implemented by SCMSS broadly for its competitive bid processes for goods and some services, but it no longer is anticipated to address the supply chains that contribute to Shared Health's food services or medication compounding activities. For tracking purposes, SCMSS developed and implemented a procedure for a member of its performance management team to undertake an annual sampling of ten (10) competitive bid processes to confirm the scored question was implemented. As described above, SCMSS is in the process of planning a two (2) stage risk assessment, including an ongoing monitoring and reporting process, as well as developing a supplier code of conduct.

Concordia also relies on HealthPRO's due diligence processes implemented with respect to their Capital Equipment, Clinical Services, Signature Services, and Pharmacy contracts.

Concordia's hiring procedures are designed to maintain compliance with federal immigration legislation and provincial employment legislation which addresses one form of child labour as defined in the Act i.e., *labour or services provided or offered to be provided by persons under the age of 18 years and that are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada.*

Concordia's hiring procedures are designed to maintain compliance with federal immigration legislation that requires permanent residency, citizenship, or a permit to work in Canada or the pending application for the same, and provincial legislation where Concordia must register to employ any foreign worker other than a Manitoba Provincial Nominee.

All prospective employees of Concordia including staff recruited for food services are recruited by advertising job opportunities on various career websites as well as the WRHA/Shared Health career website. Prospective employees are required to respond to the question "Are you legally authorized to work in Canada?" and the answer options are: "a) authorized to work for any employer, b) authorized to work for my present employer only, c) I require sponsorship to work in this country". As part of the internal controls of Concordia, applicants are required to accept an acknowledgement that states:

I understand that I am applying for employment within a site or service represented on the Winnipeg Regional Health Authority (WRHA)/Shared Health careers website. All information I provide as part of the application process is true and correct, and not misleading in any way. I understand that elements of my application may be checked, including references from prior employers, job history, education, and other qualifications and information provided by me. If it is found that I have misrepresented myself, my application may be disqualified; if I have been awarded a position, my employment may be terminated, regardless of how much time has elapsed. If I am offered employment, I will be required to supply satisfactory background checks as described in the written employment contract.

As a general practice Concordia does not employ people under the age of 18 years. However, Concordia cannot prohibit employing persons that are under the age of 18 years as that would be considered age discrimination. Concordia has hiring procedures that are designed to maintain compliance with *The Employment Standards Code* (Manitoba) which non-exhaustively requires:

1. To not employ a person under the age of 13 years.
2. To employ a person that is 13 years or older but less than 16 years old requires a Work Readiness Certificate and/or a Child Employment Permit. The Work Readiness Certificate would certify they completed the Young Worker Readiness Certificate Program which pertains to labour rights and safety and include a signed consent of their parent to the employment.
3. To not employ a person under the age of 16 years between 11:00pm and 6:00am or for more than 20 hours during a week of school.

Concordia is subject to certain WRHA regional policies as both Concordia Hospital and Concordia Place are funded by the WRHA through a service purchase agreement. WRHA Policy #20.30.040 (Security Checks for Employment) governs Concordia with respect to Concordia Hospital and is interpreted by Concordia to govern Concordia Place. As per Section 4.1 of WRHA Policy #20.30.040 (Security Checks for Employment), all new hires are required to complete a criminal records check (including vulnerable sector search), adult abuse registry check, and child abuse registry check ("Security Checks"). In Concordia's screening processes, the age of a worker (and the corresponding obligations/restrictions for employing same under *The Employment Standards Code* (Manitoba)) would be identified when reviewing the Security Checks. Section 4.4 of WRHA Policy #20.30.040 (Security Checks for Employment), provides in extenuating circumstances and with the express approval of Human Resources an applicant may commence employment before the Security Checks are obtained and provided to Concordia, the letter of offer to the applicant will contain a statement that the offer of employment is conditional on the return of satisfactory security check(s), as required, and the

failure to return same on or before the date specified could result in the immediate termination of employment for cause.

Forced Labour and Child Labour Risks

Concordia did not start the process of identifying parts of its activities or supply chains that contribute to its activities that carry a risk of forced labour or child labour being used in the previous financial year. As described above, SCMSS is in the process of planning a two (2) phase risk assessment of its suppliers, but when implemented it may only affect the supply chains managed by SCMSS.

Remediation Measures/Remediation of Loss of Income

Concordia did not undertake any measures to remediate any forced labour or child labour in its activities and supply chains in the previous financial year.

In addition, Concordia has not 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.

Training on Forced Labour and Child Labour

As described above, three (3) basic online training modules are now available on WRHA's learning management system, which are mandatory for all SCMSS staff and voluntary for other WRHA staff. SCMSS through a subscription is also able to obtain additional training and workshops.

Policies and Procedures Assessing Effectiveness

Concordia currently does not have policies or procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities or supply chains that contribute to its activities. As described above, SCMSS developed a scored question for its competitive bid processes that require proponents that meet the Act's definition of "Entity" to provide their public facing commitment to eliminate forced labour and child labour and steps they have taken to ensure its supply chain is free from forced labour and child labour. This scored question was implemented by SCMSS broadly for its competitive bid processes for goods and some services. But it no longer is anticipated to address the supply chains that contribute to Concordia's food services or medication compounding activities. As part of a procedure to assess its effectiveness in ensuring forced labour and child labour are not used in Concordia's supply chains, SCMSS developed and implemented a procedure for a member of its performance management team to undertake an annual sampling of ten (10) competitive bid processes to confirm the scored question was implemented.

Furthermore, as described above, SCMSS is in the process of planning a two (2) phase risk assessment of its suppliers, but when implemented it may only affect the supply chains managed by SCMSS. The second phase is expected to include distributing a comprehensive supplier questionnaire and conducting annual risk reviews/supplier scorecards.

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 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.

Name: Rod Harder

Title: Board Chair

Date: May 12, 2024



I have the authority to bind Concordia