

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

MARCH 31, 2026

**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 Directors Windsor Regional Hospital

FROM: Kristin Kennedy, President & CEO

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

On behalf of Windsor Regional Hospitals, 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.



Kristin Kennedy, President and CEO Windsor Regional Hospital  
May 31, 2026

I have the authority to bind the Hospital.

I certify that this attestation has been approved by the Board of Directors of Windsor Regional Hospital on June 4, 2026



Ian McLeod  
Board Chair

## **Executive Summary**

Windsor Regional Hospital incorporate without share capital under the laws of Ontario, is a large acute care hospital located on two campuses. It serves the growing and diverse population of the communities of Windsor – Essex.

Windsor Regional Hospital is committed to operating with integrity and high ethical standards, including respecting human rights as outlined in our Code of Business Conduct, Ethics and Whistleblowing, Intimate Partner and Domestic Violence Policy, Acceptance of Gifts Policy, Equity, Inclusion, Diversity and Anti-Racism (EIDAR) Policy and Workplace Wellness Policy. Windsor Regional Hospital strives to create a healthy, safe and respectful environment that is based on the Hospital's mission and vision that embraces "Outstanding Care – No Exceptions".

Windsor Regional Hospital is required to comply with the Public Hospitals Act, the Ontario Human Rights Code and the Employment Standards Act, 2000. The Hospital also embraces Bill S-211: The Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act) and is committed to comply with its provisions. This document is prepared in compliance with section 11 of the Act for the fiscal year ending March 31, 2026.

This document will be posted on the Hospital's website and available for download.

Windsor Regional Hospital is a member of a supply chain group called Mohawk Medbuy. On our behalf they have provided the following member document – "Reporting for the "Fighting Against Forced Labour and Child Labour in Supply Chains Act.



March 2, 2026

## Reporting for the "Fighting Against Forced Labour and Child Labour in Supply Chains Act"

Dear Member,

We provide this letter in connection with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the financial year April 1, 2025, to March 31, 2026 (the "Reporting Period").

In providing this letter, we have exercised care and diligence that would reasonably be expected of a Chief Operating Officer and a Chief Marketing Officer and Senior Vice President - Strategy, in these circumstances.

The following steps have been undertaken by Mohawk Medbuy Corporation (MMC) during the Reporting Period to prevent and reduce the risk of forced labour or child labour being used within our supply chain, which may be included for completeness in legislative reporting by the hospital for compliance with the Act. This information will form part of MMC's report once approved by the MMC Board of Directors.

### Structure, Activities and Supply Chains

Mohawk Medbuy is a national, not-for-profit, shared services organization that supports hundreds of health care providers across Canada, as well as child welfare agencies and other public sector organizations. MMC provides value-driven contracting and procurement solutions for medical/surgical supplies, pharmaceutical products, local sourcing, capital (equipment, furniture, fixtures), redevelopment services, and nutrition solutions. Other services include data analytics, in-hospital support, warehousing and logistics, technology, procure-to-pay and accounts payable. The warehousing services are delivered through wholly owned subsidiary, Hospital Logistics Inc., that services hospitals in southern Ontario.

Mohawk Medbuy sources over 300,000 items utilized by health care providers and other public sector organizations. Most suppliers of these products are large multinational corporations with a Canadian presence that may produce or source globally.

### Policies and Due Diligence Processes

#### Contractual Framework

Mohawk Medbuy includes standard contract language within the Representations and Warranties section of our Supplier Agreements that prohibits the use of forced and/or child labour:

*"The goods and any services provided by the Supplier under this agreement are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada's Fighting against Forced Labour and Child Labour in Supply Chain's Act)."*



Competitive procurement templates (e.g., RFPs) include language requiring suppliers bidding for hospital business to attest that they do not use forced labour or child labour.

*“Warrants that the goods and services that the Proponent is proposing to provide to the Purchaser are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act).”*

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

Many of the suppliers that respond to Mohawk Medbuy procurements have a long history of working with our organization. When new suppliers respond, Mohawk Medbuy thoroughly reviews their responses to the attestation and Agreement redlining to ensure that they’re compliant with the Act. If Mohawk Medbuy is advised of any suspicious activity on this front, 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 such time that they can demonstrate compliance.

### **Supplier Engagement**

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

### **Formal Grievance Mechanism**

Mohawk Medbuy is committed to supporting the highest standard of ethics in our business practices. 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 provided by a confidential and anonymous external service to which employees and other third parties (e.g., contractors and suppliers) may make a good faith report about suspected irregularities. The Whistle Blower Reporting Line can be accessed by MMC through our website.

### **Supplier ESG Risk Management**

Mohawk Medbuy conducted a **Supplier ESG Risk Assessment** for the Reporting Period, which included 34 suppliers (representing approximately 70% of MMC’s total contracted spend). As part of the Assessment, we reviewed supplier disclosures on unethical labour practices, environmental violations, overall regulatory compliance, as well as supply chain risk management practices and associated documentation. From the suppliers in our sampling, there were no reported violations under the Act (in accordance with their Modern Slavery report submission to Public Safety Canada). MMC intends to expand our Supplier ESG Assessment next fiscal to cover 90% of contract spend.

### **Supplier Standards**

A “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.

MMC’s Supplier Standards are planned for implementation in 2026 and are currently undergoing legal review prior to rollout. The implementation will follow a phased approach, beginning with MMC’s top suppliers.



## Supplier ESG Maturity Assessment

Delivered in the form of a supplier survey, a Supplier ESG Maturity Assessment will be implemented in the next financial year. It will be rolled out to top suppliers to gain a clearer understanding of their overall ESG performance, including supply chain risk management, and to show potential areas for advancement.

## Forced Labour and Child Labour Risks

Mohawk Medbuy recognizes there are inherent risks within the health care sector. Industry-related risks arise from the complexity and diversity of materials and services needed in health care operations. Geography-specific risks may arise from the variations in labour laws, enforcement and governance across global regions.

MMC's risk exposure is directly linked to that of our contracted suppliers, and we have implemented a multi-pronged approach to mitigate such risks. These include a comprehensive Supplier ESG Risk Assessment, contractual and RFX requirements strictly forbidding child labour and forced labour in our supply chain. MMC is developing a Supplier Code of Conduct, which will be implemented in 2026 to reinforce our expectation of suppliers to conduct business ethically, transparently and with the highest levels of integrity.

MMC will continue to strengthen our governance measures to more effectively track and assess how contracted suppliers are addressing forced labour and child labour risks within their operations, as well as the mitigation mechanisms they've implemented to manage those risks.

## Remediation

Mohawk Medbuy has not been made aware of any instances where forced labour or child labour exists in current supply chains, and therefore has not taken:

- Any measures to remediate forced labour or child labour.
- Any measures to remediate the loss of income to the most vulnerable families that results from forced labour or child labour.

## Training

Mohawk Medbuy has developed ESG training that has been completed by all MMC employees, and forms part of the mandatory onboarding training for new employees. The training includes a module addressing the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and provides guidance on relevant contract language, emphasizing that such language must not be removed during contract negotiations.

Mohawk Medbuy has also developed ESG training for Members, which includes content addressing the Act, and can be used by Members for employee training and compliance purposes.

More training will be developed in the next financial year to enhance the current training modules and provide further education to our Strategic Sourcing teams on supplier risk management best practices. These training resources will be available to our Members to use and support their efforts in meeting the requirements of the Act.

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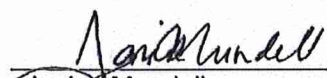
## Assessing Effectiveness

Mohawk Medbuy is committed to supporting strong governance and driving continuous improvement across our supply chain. We recognize the importance of assessing the effectiveness of our actions to address forced labour and child labour. To that end, our evaluation process includes:

- Monitoring supplier performance through an annual Supplier ESG Risk Assessment.
- Enhancing current measures by implementing a Supplier ESG Maturity Assessment in 2026 to support the ongoing evaluation of supplier progress.

Sincerely,

**MOHAWK MEDBUY**

  
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Janice Mundell  
Chief Marketing Officer and  
Senior Vice President,  
Strategy

  
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Peter Longo  
Chief Operating Officer