

niagarahealth

Extraordinary Caring. Every Person. Every Time.

*Bill S-211: Fighting Against Forced Labour  
and Child Labour in Supply Chains Act*

**Annual Report**

Financial Period: April 1, 2025, to March 31, 2026

**Niagara Health System**

**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 Niagara Health System, (the “Board”)

**FROM:** Lynn Guerriero  
President & Chief Executive Officer  
Niagara Health System

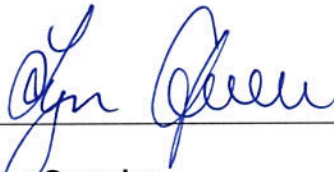
**Date:** May 26, 2026

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

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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.

I have the authority to bind Niagara Health System.



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**Lynn Guerriero**  
President & Chief Executive Officer  
Niagara Health System  
May 26, 2026.

I certify that this attestation has been approved by the Niagara Health System on  
May 26, 2026.



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**Marylee O'Neill**  
Chair, Board of Directors  
Niagara Health System

## Summary of Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour

Niagara Health System (“Niagara Health”, “NH”) is committed to preventing and reducing the risk of forced labour and child labour and has taken the following measures during the reporting period.

- ***Training and Awareness on Forced and Child Labour Risks***

NH Strategic Sourcing (“SS”) has developed and is currently working towards implementing training and awareness materials to educate employees on the risks, indicators and prevention of forced labour and child labour within supply chains. This initiative will help to strengthen internal understanding and support risk identification and mitigation.

- ***Vendor Attestation and Procurement Controls***

NH SS maintains and continues to enhance the use of vendor attestations forms as part of all competitive procurement processes. Suppliers are required to acknowledge and confirm compliance with requirements related to forced labour and child labour, this helps in reinforcing accountability and enhances ethical sourcing practices.

- ***Stakeholder Engagement and Collaboration***

NH SS continues to collaborate with Mohawk Medbuy Corporation (MMC) and other hospital organizations to share best practices and enhance efforts to combat forced labour and child labour. This collaboration includes initiatives such as Environmental, Social, and Governance (ESG) education, vendor mapping discussions, and joint strategies to strengthen ethical sourcing and compliance frameworks.

- ***Participation in External Learning and Industry Initiatives***

SS Director and Procurement Coordinator participate in seminars focused on modern slavery to improve organizational understanding of the risk areas, and aims to use this information to educate and update responsible and ethical procurement strategies.

- ***Onboarding and Bill S-211 Training***

All new SS employees involved in the competitive procurement process are onboarded with targeted training of Bill S-211 requirements. This includes due diligence obligations and the organization’s commitment to ethical sourcing.

## Reporting Requirements

### I. Structure, Activities and Supply Chains

#### *Organizational Structure*

The Niagara Health System (“Niagara Health”, “NH”) is a multi-site hospital corporation comprised of five (5) sites serving over 450,000 residents across the twelve (12) municipalities of the Regional Municipality of Niagara. NH is made up of more than 7,300 employees, physicians, volunteers and patient partners who contribute to *NH’s* purpose of providing Extraordinary Caring. Every Person. Every Time.

More information on the services provided at each site can be found below:

- [Fort Erie Site](#)
- [Niagara Falls Site](#)
- [Port Colborne Site](#)
- [St. Catharines Site](#)
- [Welland Site](#)

The construction of a new South Niagara Hospital began in Summer 2023 with occupancy planned for 2028. Following an open and competitive procurement process in collaboration with Infrastructure Ontario (IO), Ellis Don Infrastructure Healthcare (“EDIH”) was awarded the contract to design, build, finance and maintain this new site. The 1.3 million-square-foot hospital will be twelve (12) stories tall and will have up to 469 beds, a majority of which will be net new, increasing NH’s capacity to provide inpatient services for the region.

#### *Niagara Health’s core activities include:*

- The provision of inpatient and outpatient clinics and services, including acute, surgical, emergency and urgent, kidney, complex, mental health and addition, long term and cancer care. A full list of services is available [here](#).
- Working closely with more than 90 academic partners to advance medical education, research and knowledge.

#### *Niagara Health’s supply chain activities*

Supply chain activities are primarily the sourcing/procurement, distribution/logistics, data analytics of medical supplies and equipment to support patient care. NH’s purchasing hierarchy directs that products and equipment are primarily sourced through MMC initiatives. NH Strategic Sourcing and Logistics independently runs RFXs for services and renovations. All procurement activities for the South Niagara Hospital are run by the Furniture, Fixtures and Equipment (FF&E) project team. Small quantities of chargeable clinical, ED and physio items such as air casts, crutches and splints are sold to patients.

## II. Policies and Due Diligence Processes

At NH, the core values of compassion in action, driven by optimism, and achieving ambitious results guide all decision making and behaviors. NH acknowledges the importance of providing an environment where all are treated with respect and dignity and has embedded this responsibility into the following policies and processes.



### **Corporate Responsibility**

#### ***Employment Policies***

The employment of all staff (permanent, full-time, part-time, casual) is governed by NH employment policies. These comply with the *Employment Standards Act, 2000 (ESA)* which ensures fair employee treatment and sets minimum standards for workplaces in Ontario regarding minimum wage, hours of work limits, termination of employment, severance pay, vacation and more.

#### ***Employee Code of Conduct***

The Employee Code of Conduct and Mutually Respectful Workplace and Diversity Policy provide overall guidance on workplace conduct and relations. NH staff are expected to treat others equitably, with respect, dignity, understanding and acceptance.

Unacceptable behaviors include bullying, harassment, and intimidation. Both policies are compliant with the Ontario Human Rights Code which prohibits discriminatory actions against people based on protected ground in a protected social area.

#### ***Whistleblower Policy***

NH is committed to the highest standards of business and ethical conduct and values openness and transparency in all matters of business. This policy encourages and enables the reporting of alleged or potential wrongdoings relating to violation of policies, ethical behaviors or business conduct, including those related to the use of forced and/or child labour by NH or supply chain partners. These reports, when made in good faith, ensure without fear of reprisal and ensure protection the confidentiality of those making the report.

## **Strategic Sourcing Due Diligence**

### ***Training and Awareness on Forced and Child Labour Risks***

NH Strategic Sourcing and Logistics has developed structured training and awareness modules to educate employees on the risks, indicators and prevention of forced labour and child labour within supply chains. These training materials will be implemented in the form of e-learning modules available to employees across departments to support informed decision-making and enhance risk identification capabilities across procurement activities.

### ***Procurement Controls***

NH continues to utilize and strengthen the vendor attestation forms throughout all competitive procurement processes. Suppliers are required to attest to their compliance with forced and child labour practices. This process increases transparency, supports supplier accountability, and maintains ongoing due diligence within the supply chain.

### ***Partnerships with Mohawk Medbuy Corporation***

A large portion of NH's purchasing activity leverages MMC contracts. NH continues to collaborate with Mohawk Medbuy Corporation (MMC) to strengthen efforts in addressing forced and child labour. MMC has confirmed the following:

- Provided Environmental, Social, and Governance (ESG) education training including specific to Bill-S211 to all relevant employees
- Implemented Supplier ESG Risk Assessment and reviewed supplier disclosures related to unethical labour practices

This partnership strengthens NH's approach to ethical sourcing and contributes to broader sector wide improvements.

### ***External Engagement and Continuous Improvement***

NH participated in seminars and knowledge development sessions focused on modern slavery and ethical sourcing. These engagements improve organizational awareness of emerging risks and inform continuous improvements to procurement strategies and due diligence practices.

### ***Training and Onboarding on Bill S-211 Requirements***

NH Strategic Sourcing provides targeted onboarding and ongoing training to all employees involved in competitive procurement on Bill S-211 requirements with expectations regarding ethical sourcing and reporting obligations. This ensures strategic sourcing personnel are equipped with knowledge required to uphold compliance and organizational standards.

### **III. Risks and Management of Risks**

We have not yet identified any risks.

### **IV. Remediation of Risks**

We have not identified any risks.

### **V. Remediation of Loss of Income to Most Vulnerable Families**

We have not identified any risks.

### **VI. Employee Training and Communications**

- At this time, all employees responsible for contracting and sourcing products and services within the Strategic Sourcing, Logistics, and Redevelopment Teams have received training on Bill S211 and corporate policies and procedures.
- Bill S-211: Fighting Against Forced Labour and Child Labour in Supply Chains Act Annual Report will be posted on website week of June 3<sup>rd</sup>.

### **VII. Ensuring Effectiveness**

NH Strategic Sourcing and Logistics regularly reviews and audits the organization's policies and procedures related to forced labour and child labour and compliance with legislative requirements.