



SEVEN OAKS GENERAL HOSPITAL

**FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT
SEVEN OAKS GENERAL HOSPITAL ANNUAL REPORT
FOR APRIL 1, 2024 – MARCH 31, 2025**

Introduction

This annual report been prepared pursuant to Seven Oaks General Hospital’s responsibilities and requirements under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”).

Seven Oaks General Hospital 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 second completed pursuant to the Act by Seven Oaks General Hospital.

Structure

Seven Oaks General Hospital is a community hospital and provides most general hospital services, with some exceptions, to its local community in northwest Winnipeg, as well as services for residents from other parts of Winnipeg and beyond. Seven Oaks General Hospital is a major provider of Urgent Care services, a hub for Kidney Health services, and has a large commitment to Family Medicine, both in terms of in-patient medical care, but also as a center for the training of medical residents and the home of a community medical clinic.

Seven Oaks General Hospital is continued as a corporation under *The Seven Oaks General Hospital Incorporation Act* (Manitoba) and is a health corporation as defined in *The Health System Governance and Accountability Act* (Manitoba). Seven Oaks General Hospital operates under a service purchase agreement with the Winnipeg Regional Health Authority (the “WRHA”) wherein the WRHA agrees to provide funding to Seven Oaks General Hospital for the provision of certain health services.

Seven Oaks General Hospital Activities

Seven Oaks General Hospital has determined it is engaged in the production, importing, and distribution of goods as follows:

1. Food services:
 - a. Seven Oaks General Hospital provides an onsite meal service where its staff heat pre-prepared meals and then distribute them to patients.
2. Compounded medications:
 - a. Seven Oaks General Hospital 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 Seven Oaks General Hospital, and compounds medications that are not sold but used for patient care at Seven Oaks General Hospital. The compounded medications are dispensed by the WRHA Pharmacy Program to the site staff, including Seven Oaks General Hospital staff, that provide them to patients.
3. Importing:
 - a. Seven Oaks General Hospital relies on Shared Health's Supply Chain Management Shared Service ("SCMSS") to procure goods to support its clinical programs. SCMSS on behalf of Seven Oaks General Hospital 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 Seven Oaks General Hospital understands such is not considered importing under the Act.
 - b. However, SCMSS on behalf of Seven Oaks General Hospital on an 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.

Supply Chain Underlying Seven Oaks General Hospital Activities

Supply Chain Management Shared Services ("SCMSS") is a shared administrative service under Shared Health who leads and coordinates a number of provincial shared services on behalf of health organizations in Manitoba. As a provincially legislated requirement, Shared Health provides fully centralized supply chain services to all sites operated by the Winnipeg Regional Health Authority ("WRHA") and is responsible to lead the competitive bids processes and/or establishing contracts with suppliers for Shared Health itself (for its operations in Winnipeg and elsewhere in Manitoba), the Winnipeg Regional Health Authority ("WRHA"), and certain health corporations that operate hospitals in Winnipeg. Generally, these purchases are made from contracts established by SCMSS with these suppliers, however, there may be some exceptions.

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.

SCMSS' responsibility for Seven Oaks General Hospital's activities are as follows:

1. For the onsite meal service, Seven Oaks General Hospital partners with the WRHA's Regional Distribution Facility to produce and then distribute the pre-prepared meals to Seven Oaks General Hospital, that Seven Oaks General Hospital then heats and distributes to patients. However, SCMSS is responsible to lead the competitive bid processes and/or contracting with suppliers to supply and deliver the raw materials used by the WRHA's Regional Distribution Facility to produce the pre-prepared meals. A description of the direct and indirect suppliers that contribute goods/services to the goods produced and distributed through Seven Oaks General Hospital's onsite meal service and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.
2. Seven Oaks General Hospital partners with the WRHA's Pharmacy Program to compound medications that are not sold but used for patient care at the Seven Oaks General Hospital. 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 Seven Oaks General Hospital 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 Seven Oaks General Hospital from a distributor if Seven Oaks General Hospital'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. A description of the direct and indirect suppliers that contribute goods/services to the goods imported by SCMSS, on behalf of Seven Oaks General Hospital, 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, 2023 – March 31, 2024)

During the previous financial year, Seven Oaks General Hospital 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 Seven Oaks General Hospital. These steps were undertaken by Supply Chain Management Shared Services (“SCMSS”) and were applied broadly and therefore were not only applied to the supply chains that contribute to Seven Oaks General Hospital’s activities. Generally, these steps included:

1. Developing and implementing anti-forced labour and/or child labour standards and/or compliance checklists;
2. Developing and implementing procedures to track effectiveness in addressing forced labour and/or child labour; and
3. Engaging with supply chain partners on the issue of addressing forced labour and/or child labour.

These steps were not undertaken for goods imported into Canada by Seven Oaks General Hospital.

Developing and implementing anti-forced labour and/or child labour standards and/or compliance checklists

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.

As of late March 2025, SCMSS was in the process of developing anti-forced labour and/or child labour contractual clauses to include in contracts entered into pursuant to its competitive bid processes. But these contractual clauses were not finalized or implemented in the previous financial year.

Developing and implementing procedures to track effectiveness in addressing forced labour and/or child labour

SCMSS developed and implemented a procedure to undertake an annual sampling of ten (10) competitive bid processes to confirm the scored question described above was implemented.

In the past financial year, SCMSS was in the process of setting up a performance management team to ensure suppliers maintain contractual compliance and key performance indicators. The performance management team may be assigned the annual sampling in the future.

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

Seven Oaks General Hospital 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, Seven Oaks General Hospital has implemented some other due diligence processes, and while not policies, Seven Oaks General Hospital has hiring procedures that are designed to maintain compliance with federal immigration legislation.

As described above, SCMSS, acting on behalf of Seven Oaks General Hospital and other health entities of Manitoba, 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. For tracking purposes, SCMSS developed and implemented a procedure to undertake an annual sampling of ten (10) competitive bid processes to confirm the scored question was implemented.

Seven Oaks General Hospital'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.

Seven Oaks General Hospital'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 Seven Oaks General Hospital must register to employ any foreign worker other than a Manitoba Provincial Nominee.

All prospective employees of Seven Oaks General Hospital 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 Seven Oaks General Hospital, 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 Seven Oaks General Hospital does not employ people under the age of 18 years. However, Seven Oaks General Hospital cannot prohibit employing persons that are under the age of 18 years as that would be considered age discrimination. Seven Oaks General Hospital 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.

Seven Oaks General Hospital is subject to certain WRHA regional policies as it is funded by the WRHA through a service purchase agreement. As per Section 4.1 of [Winnipeg Regional Health Authority 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 Seven Oaks General Hospital’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 Winnipeg Regional Health Authority 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 Seven Oaks General Hospital, 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).

Forced Labour and Child Labour Risks

Seven Oaks General Hospital did not start the process of identifying parts of its activities and supply chains that carry a risk of forced labour or child labour being used in the previous financial year.

Remediation Measures/Remediation of Loss of Income

Seven Oaks General Hospital 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, Seven Oaks General Hospital 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

Seven Oaks General Hospital does not currently provide training to employees on forced labour and/or child labour.

Policies and Procedures Assessing Effectiveness

As described above, SCMSS acting on behalf of Seven Oaks General Hospital and other health entities of Manitoba 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. As part of a procedure to assess its effectiveness in ensuring forced labour and child labour are not used in Shared Health's supply chains, SCMSS developed and implemented a procedure to undertake an annual sampling of ten (10) competitive bid processes to confirm the scored question was implemented. In the past financial year, SCMSS was in the process of setting up a performance management team to ensure it meets certain business standards. The performance management team may be assigned the annual sampling in the future.

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act), and in particular section 11 thereof, I, in the capacity of Seven Oaks General Hospital Board Chair, attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.

Date: May 21, 2025



Tim Feduniw
Seven Oaks General Hospital Board Chair

I have the authority to bind Seven Oaks General Hospital