



SEVEN OAKS GENERAL HOSPITAL

**FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT
SEVEN OAKS GENERAL HOSPITAL ANNUAL REPORT
FOR APRIL 1, 2025 – MARCH 31, 2026**

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 third 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. Medications are compounded in the Health Sciences Centre by a pharmacy operated by the WRHA Pharmacy Program, and compounds medications that are not sold but used for patient care at Seven Oaks General Hospital. The compounded medications are dispensed by the applicable pharmacy 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. 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

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. 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 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, 2024 – March 31, 2025)

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, or goods imported into Canada by Shared Health. Generally, this included:

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

Shared Health 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 Shared Health 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. Three (3) basic online training modules are now available on Shared Health'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 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.

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.

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

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 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

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

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

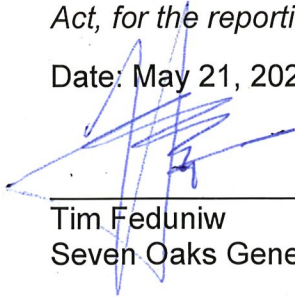
Policies and Procedures Assessing Effectiveness

Shared Health 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 Shared Health'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 Shared Health'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 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, 2026



Tim Feduniw
Seven Oaks General Hospital Board Chair

I have the authority to bind Seven Oaks General Hospital