

2025-26 Annual Report on Forced Labour and Child Labour in Supply Chains

Attestation by the Board of Directors

Kemptville District Hospital

Entity: Kemptville District Hospital
2675 Concession Road, Kemptville, Ontario, Canada, K0G 1J0
For the Fiscal Year April 1, 2025 – March 31, 2026
Business Number: 107562514

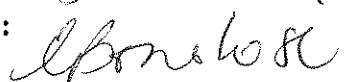
In accordance with the requirements of the *Fighting Against Force Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Chair of the Board of Directors, attest that I have reviewed the information contained in the report on behalf of the governing 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 above.

This report received approval from the Board of Directors of Kemptville District Hospital on May 28, 2026.

Full name: Enn Bonokoski

Title: Board Chair

Date: May 28/26

Signature: 

I have the authority to bind Kemptville District Hospital



Annual Report on Forced Labour and Child Labour in Supply Chains

Kemptville District Hospital

Fiscal Year: April 1, 2025, to March 31, 2026

Introduction

Forced labour can be found in every country and every sector. The International Labour Organization estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through the global supply chains of businesses.

There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions doing business in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

The measures introduced (the *Supply Chains Act*) aim to increase industry awareness and transparency and drive businesses to improve practices.

Kemptville District Hospital ("KDH") is defined as an "Entity" under the *Supply Chains Act* and, therefore, must submit an annual report to the Minister of Public Safety by May 31 of each year. Reports must detail the steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used by KDH in our supply chains.

All reports will be made available to the public in two ways:

- In the Public Disclosures section on [KDH's website](#)
- In an electronic registry on [Public Safety Canada's website](#)

The following information uses the Minister's online questionnaire as the template for the report.





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Submission information

#	Question	Response
1	This report is for... (Mandatory)	An entity
2	Legal name of the reporting entity (Mandatory)	Kemptville District Hospital
3	Reporting deadline for which you are submitting (Mandatory)	31-May-26
4	Financial year covered by report (Mandatory)	April 1, 2025 to March 31, 2026
5	Is this a revised version of a report already submitted this reporting year? (Mandatory)	No
5.1	If yes, original submission date (Mandatory)	—
5.2	If yes, describe changes made (Mandatory)	—
6	For entities only: Business number(s)	107562514
7	For entities only: Is this a joint report? (Mandatory)	No
7.1	If yes, legal names of entities covered (Mandatory)	—
7.2	If yes, business number(s) of entities covered	—
8	For entities only: Is the entity also subject to reporting requirements under supply chain legislation under another jurisdiction? (Mandatory)	No
8.1	If yes, select applicable law(s) (Mandatory)	—
9	For entities only: Which categorization(s) apply to the entity? (Mandatory)	<p>Canadian business presence:</p> <ul style="list-style-type: none"> • Has a place of business in Canada • Does business in Canada • Has assets in Canada <p>Meets size-related thresholds:</p> <ul style="list-style-type: none"> • Has at least \$20 million in assets for at least one of its two most recent financial years • Employs an average of at least 250 employees for at least one of its two most recent financial years
10	For entities only: In which sectors or industries does the entity operate? (Mandatory)	<p>Health care and social assistance:</p> <ul style="list-style-type: none"> • Hospitals
11	For entities only: In which country is the entity headquartered or principally located? (Mandatory)	Canada
11	If in Canada: In which province or territory is the entity headquartered or principally located? (Mandatory)	Ontario
12	For government institutions only: Government institutions only	Not applicable



Annual Report - Reporting for entities

#	Question	Response
1	Which of the following accurately describes the entity's structure? (Mandatory)	Corporation
2	Which of the following accurately describes the entity's activities? Select all that apply. (Mandatory)	<ul style="list-style-type: none"> • Importing into Canada goods produced outside Canada
3	What steps has the entity taken in the previous financial year 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 entity or of goods imported into Canada by the entity? Select all that apply. (Mandatory)	<ul style="list-style-type: none"> • Mapping activities • Conducting an internal assessment of risks of forced labour and/or child labour in supply chains • Developing and implementing an action plan for addressing forced labour and/or child labour • Monitoring suppliers (quarterly risk reviews) • Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour • Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
4	Please describe the steps the entity has taken to prevent or reduce risks of forced labour or child labour in its supply chains. (if applicable) (3,000 character limit)	<p>In FY 2025–26, Kemptville District Hospital (KDH) continued to advance actions initiated in prior years to mitigate the risks of forced labour and child labour within its supply chains, while further strengthening procurement practices in response to evolving provincial requirements. Procurement oversight remained centralized, with continued monitoring of supplier activities through previously implemented surveys, with particular focus on vendors sourcing goods from outside Canada. Where possible, KDH continues to prioritize procurement through Canadian-based entities and ensures that higher-risk procurement channels (e.g., international vendors and online marketplaces such as Amazon) are managed directly through the Procurement team using controlled corporate accounts.</p> <p>During the year, KDH enhanced its procurement governance framework to align with new Ontario procurement restriction policies. This included the introduction of a formalized exception process and supporting documentation to assess and approve any procurement that falls outside standard policy requirements. These measures strengthen oversight, ensure risk-based decision-making, and support compliance with applicable legislation and ethical sourcing expectations.</p> <p>The action plan established in previous fiscal years remained in place and includes quarterly monitoring of higher-risk suppliers and periodic reassessment of supply chain risks. Staff education on ethical procurement continued through internal communications, the Surge Learning Portal, and targeted management updates. Additional education was initiated to support awareness of new procurement requirements and processes across impacted teams.</p>



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KDH continues to collaborate with regional and shared service partners—including Champlain Health Shared Services (CHSS), Mohawk Medbuy, Queensway Carleton Hospital (QCH), Eastern Ontario Regional Laboratory Association (EORLA), and Compass Group—to align with broader sector practices and leverage established due diligence processes.

5 Does the entity currently have policies and/or due diligence processes in place related to forced labour and/or child labour? (Mandatory)

Yes

5.1 If yes, which elements of the policies and/or due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Mandatory)

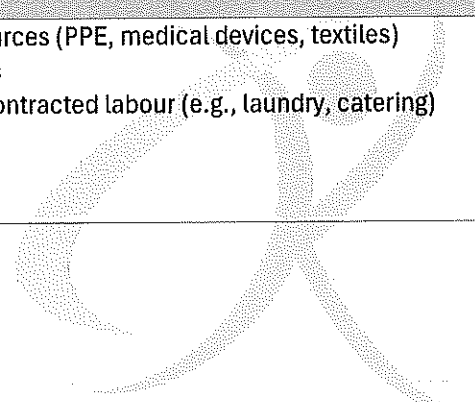
- Embedding responsible business conduct into policies and management systems
- Communicating how impacts are addressed (internal updates)
- Providing for or cooperating in remediation when appropriate

6 Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Mandatory)

Yes, we have started the process of identifying parts of our activities and/or supply chains that carry risks, but there are still gaps in our assessments.

6.1 If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Mandatory)

- The types of products it sources (PPE, medical devices, textiles)
- Tier two (indirect) suppliers
- The use of outsourced or contracted labour (e.g., laundry, catering)





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7	Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Mandatory)	<ul style="list-style-type: none"> • Health care and social assistance – Hospitals
8	Please provide details on the parts of the entity’s activities and supply chains where the entity has identified a risk of forced labour or child labour and describe the actions taken to assess and manage those risks Please provide additional information on the parts of the entity’s activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (3,000 character limit)	<p>KDH recognizes that forced and child labour risks may exist within its medical supplies and equipment supply chains, particularly where components are sourced indirectly through multiple tiers. While no instances of non-compliance have been identified, KDH continues to strengthen its risk assessment and mitigation approach.</p> <p>To manage these potential risks, KDH:</p> <ul style="list-style-type: none"> • Engages closely with procurement partners—Champlain Health Shared Services (CHSS), Queensway Carleton Hospital (QCH), Mohawk MedBuy, Compass Group, The Ottawa Hospital (TOH), and the Eastern Ontario Regional Laboratory Association (EORLA)—leveraging their established policies, procedures, and due-diligence tools to vet suppliers and trace origin. • All supplier agreements include clear clauses requiring compliance with Canadian and international labour laws and banning forced or child labour. • For high-risk vendors (e.g., Amazon), we purchase only through their Canadian offices to ensure adherence to our standards. • Provides ongoing training for Procurement and Materials Management staff via the Surge Learning Portal and in-person sessions. • Collaborates with partners and suppliers on remediation: If a supplier reports an issue, we work together on a corrective action plan and monitor progress closely. • Procurement from higher-risk vendors and non-standard sourcing arrangements is subject to enhanced internal controls and oversight. • During FY 2025–26, KDH introduced a formalized procurement exception process, including standardized documentation, to assess and approve purchases that fall outside established policy requirements. Implemented in response to new Ontario procurement restriction policies and support improved transparency and risk-based decision-making. • Targeted education and communication were provided to relevant staff to support the implementation of these updated procurement processes and requirements. <p>Going forward, we plan to create a survey for vendors to gather insights and feedback. Additionally, we will update our competitive process to better incorporate the requirements of the law, ensuring compliance and transparency. We will also focus on educating managers and those involved in purchasing beyond the core team to enhance their understanding of the new regulations. We intend to collaborate with regional partners, such as TOH, to explore the tools they are using and identify best practices that can be implemented within our organization</p>

9	Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Mandatory)	Not applicable – we have not identified any instances of forced labour or child labour in our supply chains.
9.1	If yes, which remediation measures has the entity taken? (Mandatory)	Not applicable
10	Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Mandatory)	Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.
11	Does the entity currently provide training to employees on forced labour and/or child labour? (Mandatory)	Yes
11.1	If yes, is the training mandatory? (Mandatory)	Yes, the training is mandatory for some employees.
12	Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Mandatory)	Yes
12.1	If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Mandatory)	<ul style="list-style-type: none"> • Tracking relevant performance indicators (training completion rates) • Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour



