



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

Annual Report – FY25/26

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April 1, 2025 to March 31, 2026:

Introduction

Waypoint Centre for Mental Health Care ("Waypoint" or "Corporation" or "the Hospital") provides this report in line with the requirements of the Act. This annual report describes the activities of the Hospital to limit the risk of using forced and child labour in the supply chain. This report covers activities from April 1, 2025 to March 31, 2026 (the "Reporting Period").

Mandatory Reporting Requirements

As an Ontario hospital, this new legislation requires mandatory reporting requirements. It is the Hospital's responsibility for the operations to undertake steps to ensure compliance with these requirements and to ensure the Board is aware of this compliance.

In addition, through its Governance Standards, Accreditation Canada requires that the Board understands and complies with applicable laws, legislation, and regulations.

Hospitals are required through the Accountability Agreements with Ontario Health that Hospitals make annual declarations of compliance with the Broader Public Sector Accountability Act (BPSAA), which includes an annual attestation declaring compliance with a number of directives, of which one includes a stringent procurement directive.

Waypoint maintains corporate policies that promote ethical conduct and business practices, these include:

- Ethics Program
- Procurement Policy
- Code of Conduct
- Whistleblower
- Approval Authority Schedule (AAS)

The Hospital also maintains an Environmental Committee that aims to reduce our environmental footprint and maintain compliance with municipal, provincial, and federal legislation, while improving the Hospital's social presence and overall governance policies, to protect and promote human health and wealth

Mandatory Requirement – 1. Structure, Activities and Supply Chains

Waypoint (the Hospital) is incorporated without share capital, under the laws of Ontario, and is a registered charity under the Income Tax Act (Canada).

The Hospital is an independent entity under the Public Hospitals Act (Ontario), with a primary focus on mental health care. The Hospital operates in the Simcoe County including sites in the towns of Midland.

The Hospital utilizes the services of several Group Purchasing Organization (GPOs) for the majority of the supply chain functions.

Mandatory Requirement – 2. Policies & Due Diligence Processes

Waypoint has a number of policies and practices in place that support socially responsible business practices, human rights, and health and safety. These are imbedded in the core values and through the Hospital's strategic plan.

Ethics Program

The Hospital is committed to providing an Ethics Program that supports our staff, physicians, volunteers and affiliates that encourages open communication and collaboration between healthcare providers. The Ethics Program includes ethical decision-making support, consultation support, trending and analysis, education on relevant ethical issues as well as current and emerging legislation. The Ethics Decision Making Tool guides our health care practitioners, their actions and decision-making processes when providing care to patients with ethical decision-making support and resources.

Procurement Policy

The Hospital's procurement policy adheres to the appropriate legislation and applicable laws.

The Hospital ensures that all legislation is met with regard to the procurement process; the corporation follows all aspects of Broader Public Sector, Procurement Directive, and Agreement on Internal Trade policies.

The Hospital adheres to the code of ethics within The Supply Chain Management Association (SCMA).

Code of Conduct

A Code of Conduct is a set of standards to help create and maintain a culture of integrity and accountability, which is vital to achieving our mission and vision. The Code of Conduct is a set of expectations that outline the behaviours and responsibilities in the workplace.

Waypoint is committed to supporting an environment that values integrity, honesty, and fairness and promotes a positive and safe workplace that is reflective of the highest quality of care and professional conduct. We support this through consistently demonstrating Care, Respect, Innovation and Accountability behaviours.

Whistleblower

The Hospital is committed to the highest ethical standards. We strive to conduct our business with integrity and to ensure compliance with all applicable Federal and Provincial

laws, regulations and professional standards. In line with this and in keeping with the Hospital's commitment to maintaining open communication, this policy intends to foster an environment where issues of concern can be raised, with no reprisal.

Approval Authority Schedule (AAS)

In compliance with Broader Public Sector (BPS) Procurement Directives, this policy is designed to establish an Approval Authority Schedule (AAS) for Waypoint. This policy intends to define the signing authority levels required for approval of all procurements at Waypoint.

The Hospital is legislatively obligated to follow the provisions within the Ontario Not-for-profit Corporations Act (ONCA). Any authority to bind the corporation stems from that Act and is stated within the Corporate By-Laws of the Hospital.

The Board of Directors have authorized the President & CEO with the authority to bind the corporation. From this, the President & CEO has delegated these powers to each member of the Executive team.

When procurement involves a contract, obligation, service and/or maintenance agreement, the Executives of the Hospital are the only ones that can legally sign the document and therefore bind the corporation. A legally binding document that defines the terms of the agreement between a supplier or provider of the services, and the Hospital must be executed this way.

In addition to the policies listed, the Hospital maintains an Environmental Committee, its objective is to reduce our environmental footprint and maintain compliance with municipal, provincial, and federal legislation.

The Hospital outsources majority of its procurement activity to Mohawk Medbuy Corporation ("MMC") and will continue to work with them to ensure any necessary steps are taken to help prevent and reduce the risk of forced labour or child labour used in supply chains.

MMC has attested that they have taken the following steps:

- Competitive procurement templates have been modified to include language that suppliers/vendors bidding must attest to warrants that the goods and services that the Proponent is proposing to provide are not a result of, and in no way involve, forced labour or child labour.
- Modified standard contract language to include representation and warranties that goods and any services provided by the Supplier under the agreement are not the result of, and in no way involve, forced labour or child labour.

- Formalized its commitment to sustainability and environment, social and governance (ESG) practices through the creation of a dedicated ESG team.

Mandatory Requirement – 3. Areas of Risk

Waypoint is not aware of any instances where forced labour or child labour exists in the current supply chains. We are aware that there may be a risk of forced labour at all levels of supply chain. Our suppliers are predominately Canadian based and required to comply with Canadian laws. We will continue to focus on how we engage with MMC and suppliers, which operate, in sectors and jurisdictions at higher risk of forced labour or child labour.

MMC has also attested to the Hospital that it is not aware of any instances where forced labour or child labour exists in current supply chains.

Mandatory Requirement – 4. Measures Taken to Remediate Forced & Child Labour

The Hospital has reviewed all practices and current due diligence processes, and to date we have not identified any areas of risk.

Mandatory Requirement – 5. Measures Taken to Remediate Loss of Income

The Hospital has reviewed all practices and current due diligence processes, and to date we have not identified any areas of risk.

Mandatory Requirement – 6. Training

A corporation wide communication has been undertaken to provide awareness broadly about this new legislation and the requirements under the Act. This was shared on September 30, 2026 via correspondence to both the Leadership and globally on the Intranet.

The Ontario Hospital Association is developing additional policies and training materials to be shared across the membership to ensure ongoing compliance with the requirements of Bill S-211.

Mandatory Requirement – 7. Assesses the Effectiveness

The Hospital is committed to continue to conduct supply chain exercises to identify the risk of forced labour and child labour at all levels of the supply chain, and to address them, as needed.

Group Purchasing Organizations (GPOs), shared services and other organizations are equally committed to sustain improvements in their activities related to this legislation, including the development of internal policy in their organizations and training for those in sourcing and supply chain roles.

References

Documents used for referencing this report include:

1. Broader Public Sector, Procurement Directive April 2026 - [Broader Public Sector Procurement Directive](#)
2. Ontario Human Rights Code - [The Ontario Human Rights Code | Ontario Human Rights Commission \(ohrc.on.ca\)](#)
3. Employment Standards Act - [Employment Standards Act, 2000, S.O. 2000, c. 41 \(ontario.ca\)](#)
4. Ethics Policy and Procedures
5. Code of Conduct Policy & Program
6. Communication of Alleged Wrongdoing (Internal Whistleblowing) Policy and Procedure
7. Approval Authority Schedule (AAS) – Signing Authority and Delegation Policy
8. Procurement of Goods and Services Policy and Procedure
9. Broader Public Sector, Procurement Directive - [Broader Public Sector Procurement Directive \(gov.on.ca\)](#)
10. Mohawk Medbuy Corporation Bill S211 Letter to Members dated March 2, 2026
11. Supply Chain Code of Ethics - <https://cilt.ca/wp-content/uploads/2024/03/Ontario-Broader-Public-Sector-BPS.pdf>
12. Waypoint Communication to Staff dated September 30, 2026

Attestation

Dated at Penetanguishene, Ontario this as approved by the Waypoint board of directors at their September 24, 2026 meeting



Dr. Nadiya Sunderji

President & CEO

Waypoint Centre for Mental Health Care

I certify that this attestation has been approved by the Board of Waypoint Centre for Mental Health Care at their meeting on September 24, 2026



Steve Parry

Chair of the Board of Directors

Waypoint Centre for Mental Health Care