

## Annual Report for the Fighting Against Forced Labour and Child Labour in Supply Chains Act - Fiscal Year 2025 - Norfolk General Hospital

Organization: Norfolk General Hospital (NGH)  
Prepared By: Jonathan Gaal, Purchasing Manager  
Financial Reporting Year: April 1st 2024 to March 31st 2025  
Business Number: 10777 7880  
Sector/Industry: Health Care

---

### Introduction

NGH supports the importance of eliminating forced and child labour throughout the world and is willingly participating in the opportunity to report as a publicly funded health care provider.

This report is designed to be in partnership with the Questionnaire submitted to Public Safety Canada and the requirements found under section 11 of the Act and provides information for the reporting period of April 1, 2024 - March 31 2025.

The report addresses NGH specific information on:

- I. its structure, activities and supply chains.
- II. its policies and due diligence processes in relation to forced labour and child labour.
- III. the parts of its activities and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.
- IV. any measures taken to remediate any forced labour or child labour.
- V. any measures taken 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.
- VI. the training provided to employees on forced labour and child labour; and
- VII. how the government institution assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.

### Background

Norfolk General Hospital officially opened May 20, 1925, as a 23-bed fully equipped facility. More than 2,000 citizens attended the ceremony, a sign of the incredible community support the hospital has received since its inception.

NGH is the largest healthcare organization in Norfolk County – and one of the largest employers. NGH is a community of approximately 900 staff, volunteers, and physicians that provides exceptional care to nearly 70,000 residents in Norfolk County and surrounding areas from before birth to end of life.

NGH offers expertise in several areas, including 24/7 Emergency Department care, Medicine, Internal Medicine, Anesthesia, Surgery, Critical Care, Obstetrics, Complex Continuing Care, and various specialty clinics.

Sitting directly beside our facility is the Norfolk Hospital Nursing Home (NHNH). It is an 80-bed facility that has been caring for its community for nearly 50-years. The publicly owned, non-profit facility opened in 1975. NHNH employs approximately 90 dedicated employees and operates under the direction of an independent ten-member community volunteer Board of Trustees.

NGH acquires products and services through a transparent and open process to maximize value for money to provide exceptional care to our practice and our community as a whole. Our values result in a community that strives to *deliver high-quality, integrated, and innovative care, together with our partners.*

## Policies and Due Diligence

NGH has no current policies or procedures to combat forced and child forced labour but will seek to implement in year 2025/26. NGH holds memberships in several Group Purchasing Organisations (GPO) and Shares Services Organization (SSO) that support the Forced Labour and Child Labour Act by means of attestation and other due diligence. These groups include HealthPro, Mohawk Medbuy, and other GPO's. Language included in these procurement opportunities may contain the following wording, or wording similar in nature with the intended outcome to minimise and eliminate hospital risk to forced and child labour.

*The goods and any services provided by the Supplier under this agreement are not the result of, and in no way involve, forced labour or child labour (as such terms are defined in Canada's Fighting against Forced Labour and Child Labour in Supply Chains Act).*

NGH is in full support of eliminating forced labour and child labour throughout the world. The Supply Chain Code of Ethics has been adopted by NGH and used within NGH's own Supply Chain Code of Ethics.

## Risk Assessment

For the fiscal year of 2025, NGH risk assessment has indicated minimal risk to forced child labour. NGH predominately orders through GPO's and SSO's that cover a large portion of NGH's procurement. NGH's remaining procurement is vastly local, supportive of the local economy following the guidelines under the Broader Public Sector Procurement Directive and sees minimal risk. We recognize that there is further work internally to minimizing and understanding the risks involved in forced labour, and child labour related to NGH's procurement activities and supply chain operation.

## Remediation Action:

Not Applicable, NGH have not been identified in any occurrences with the use of forced labour and child labour activities, or within our supply chain.

## Mitigating Income Loss:

Not applicable. NGH has not identified any measures taken to eliminate the use of forced labour and child labour in our activities and supply chains.

## Employee Training:

NGH has not provided any training to staff in this reporting period (fiscal 2025) but we are currently in process of implementing new training materials to educate the supply chain staff on the prevention of forced labour and child labour activities. This will be implemented in the upcoming fiscal 2026 year.

## Effectiveness Evaluation:

NGH has no information to provide at this time as we are reviewing our processes in terms of our activities within the supply chain department.

## ATTESTATION

Prepared in accordance with the Fighting Against Forced Labour and Child

Labour in Supply Chains Act (the "Act")

**TO:** The Norfolk General Hospital Board of Directors  
**FROM:** Mr. Todd Stepanuik  
President & Chief Executive Officer  
Norfolk General Hospital  
**DATE:** June 26, 2025  
**RE:** April 1 2024 – March 31 2025 ("the Applicable Period")

---

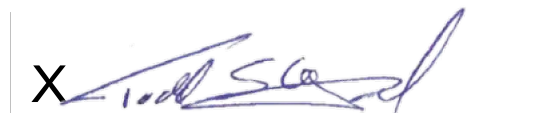
On Behalf of Norfolk General Hospital, I attest that:

- the Annual Report required of the Corporation pursuant to section 6 of the Act has been completed.
- the information contained in the Annual Report has been reviewed and approved by the Board of Directors.
- in accordance with the requirements of the Act, and in particular section 6 thereof, I have reviewed the information contained in the Annual Report for the Corporation.
- based on my knowledge, and having exercised reasonable diligence, 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.

In making this attestation, I have exercised care and diligence that would reasonably be expected of a Hospital CEO in these circumstances.

---

Dated at Simcoe, ON this June 26, 2025



X

Todd V. Stepanuik  
President & Chief Executive Officer

**Todd V. Stepanuik**  
President & Chief Executive Officer  
Norfolk General Hospital

June 26, 2025  
I have the authority to bind the Corporation

I certify that this attestation has been approved by the board of the Norfolk General Hospital on **June 26, 2025**.