



PRAIRIE MOUNTAIN HEALTH  
SANTÉ PRAIRIE MOUNTAIN

**PRAIRIE MOUNTAIN HEALTH ANNUAL REPORT FOR APRIL 1, 2023 – MARCH 31,  
2024**

**FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS  
ACT**

**Introduction**

This annual report is in response to the requirement under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”), that an “Entity” report on its activities to mitigate the risk of forced labour and child labour being employed within its supply chain and its activities.

As it was confirmed that the Act pertains to Prairie Mountain Health as an “Entity”, this annual report is the first Prairie Mountain Health has completed pursuant to the Act.

**Steps Taken in Previous Financial Year (April 1, 2023 – March 31, 2024)**

Prairie Mountain Health did not take any steps during the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of its production of goods in Canada or elsewhere by Prairie Mountain Health or of goods imported into Canada by Prairie Mountain Health. Therefore, Prairie Mountain Health has no information to provide on such steps for this reporting period.

**Structure**

Prairie Mountain Health is a health authority, and continued as a corporation under *The Health System Governance and Accountability Act* (Manitoba). The provincial clinical programs led by Prairie Mountain Health are either located in western Manitoba and consistent mainly of health care centres, personal care homes, elderly person homes and various community programs.

**Prairie Mountain Health Activities**

Prairie Mountain Health has determined it is engaged in the production, sale, importing, and distribution of goods as follows:

1. Food services:
  - a. Prairie Mountain Health operates cafeterias in the sites it operates in Manitoba where food/beverages are produced and/or assembled by its staff and then sold to the public.

- b. Within Prairie Mountain Health there is a franchise where food/beverages are assembled by its staff and sold to the public.
  - c. Prairie Mountain Health provides an onsite meal service in its operated sites in Manitoba where its staff prepare meals and distribute them to patients, residents and clients.
  - d. Contract out to vending machine supplier where food/beverages are supplied by its staff and sold to the public
2. Pharmacy compounding of medications:
- a. Prairie Mountain Health through its Pharmacy Program staff compounds medications that are not sold, but used for patient care in the Manitoba sites where the Pharmacy Program is embedded.
3. Importing:
- a. To support its provincial clinical programs, Prairie Mountain Health 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 understands such is not considered importing under the Act.
  - b. However, Prairie Mountain Health on as needed basis imports goods from distributors, with the assistance of a customs broker as needed, if its existing suppliers cannot provide the goods. This importing mostly applies to medical supplies and generally such is imported from the United States.

### **Supply Chain Underlying Prairie Mountain Health Activities**

Supply Chain Management Shared Services (“SCMSS”) is a shared administrative service under Shared Health. While Prairie Mountain Health participates in certain shared administrative services offered by Shared Health, SCMSS does not coordinate all competitive bid processes and purchasing activities for all health organizations within Manitoba. As a result, Prairie Mountain Health is also responsible for purchasing products, services, and equipment directly from suppliers. Generally, these purchases are made from contracts established by SCMSS with these suppliers, however, there are some exceptions.

Prairie Mountain Health is an active member of HealthPRO which is a national group purchasing organization. Approximately 30% of Prairie Mountain Health’s goods and equipment contracts are committed to HealthPRO agreements and approximately 95% of Prairie Mountain Health’s pharmacy contracts are committed through HealthPRO agreements. Until such time as a new provincial contract is in place, PMH continues to purchase the majority of food via the past Complete Purchasing Services contracted vendors.

SCMSS' responsibility for Prairie Mountain Health's activities are as follows:

1. SCMSS is responsible to lead the competitive bid processes and/or contracting with suppliers to supply/deliver the raw materials that are used to produce the food/beverages that are sold in Prairie Mountain Health's cafeteria services. SCMSS is not solely responsible for contracting with suppliers, PMH Materials Management will also lead the process for contracting with suppliers in instances where SCMSS is unable to meet the requirements of Prairie Mountain Health.
2. For the food/beverage franchise in PMH and vending machine services Prairie Mountain Health relies on the franchisor to source, supply, and deliver the raw materials that are used to produce the food/beverages that are sold within Prairie Mountain Health. SCMSS does not assist the franchisor with those efforts.
3. For the onsite meal service, Prairie Mountain Health follows the same process as described in point 1 above, as all foods are prepared by Prairie Mountain Health staff for onsite meal service.
4. SCMSS infrequently is responsible to lead the competitive bid processes and/or contracting with suppliers for the raw materials used to produce medications that are not sold but used for patient care. For a majority of its Pharmacy Program needs, Prairie Mountain Health relies on HealthPRO to issue competitive bid processes for these raw materials and thereafter Prairie Mountain Health together with other health care organizations enter a contract with the selected suppliers that are managed by HealthPRO. As described above, approximately 95% of Prairie Mountain Health's pharmacy contracts are committed through HealthPRO. A description of the direct and indirect suppliers that contribute goods/services to the goods produced through Prairie Mountain Health's Pharmacy Program and the source countries/regions of those goods/services, was not able to be ascertained for this annual report.
5. SCMSS, with the assistance of a customs broker, on an as needed basis imports goods for Prairie Mountain Health from a distributor if Prairie Mountain Health's existing suppliers 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 Prairie Mountain Health and a more detailed description of the source countries/regions of those goods/services, was not able to be ascertained for this annual report.

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

Prairie Mountain Health 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, Prairie Mountain Health has hiring procedures that 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.*

Prairie Mountain Health'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 Prairie Mountain Health must register to employ any foreign worker other than a Manitoba Provincial Nominee.

All prospective employees of Prairie Mountain Health including staff recruited for food and pharmacy services are recruited by advertising job opportunities on various career websites as well as the Prairie Mountain 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 Prairie Mountain Health, applicants are required to accept an acknowledgement that states that the information being provided through the application process is true and correct, that satisfactory background checks are required and if found to have misrepresented themselves they may be terminated.

As a general practice Prairie Mountain Health does not employ people under the age of 18 years. However, Prairie Mountain Health cannot prohibit employing persons that are under the age of 18 years as that would be considered age discrimination. Prairie Mountain Health 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.

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 Prairie Mountain Health’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. If an applicant must commence employment before the Security Checks are obtained and provided to Prairie Mountain Health, 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), as required, and the failure to return same as required could result in the immediate termination of employment for cause.

### **Forced Labour and Child Labour Risks**

Prairie Mountain Health 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**

Prairie Mountain Health 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, Prairie Mountain Health 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**

Prairie Mountain Health does not currently provide training to employees on forced labour and/or child labour.

### **Policies and Procedures Assessing Effectiveness**

Prairie Mountain Health has no policy or procedure in place at this time to assess its effectiveness in ensuring forced labour and child labour are or are not being used in its activities and supply chains.