



 Hennick Humber  
Hospital

 Humber River  
Health



# Forced Labour in Canadian Supply Chains

May 27, 2026

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## Introduction

This report has been prepared by Humber River Health (“HRH”) in alignment with the principles and reporting framework set out in Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) for the financial year ending March 31, 2026. The reporting entity covered by this statement is Humber River Health, business number 872785191.

For the purposes of the Act, HRH meets the entity definition by having a business in Canada, doing business in Canada and meeting the applicable thresholds for revenue, assets, and employees. However, a reporting obligation arises only where an entity engages in prescribed activities, such as producing goods, importing goods into Canada, or controlling an entity that does so. Based on current operations, HRH is not engaged in these prescribed activities, as it does not produce goods or directly import goods into Canada, and its involvement in the sale or distribution of goods is minimal. Accordingly, HRH is not subject to a mandatory reporting obligation under the Act at this time, subject to ongoing review and evolving guidance. Notwithstanding the above, HRH has elected to prepare and publish this report voluntarily as a matter of good governance, transparency, and support for broader efforts to address risks of forced labour and child labour in supply chains.

HRH is committed to providing a workplace environment where its core values of compassion, professionalism and respect are embraced and consistently guide its actions. Forced labour and child labour is contrary to the HRH vision, mission, and values. HRH does not tolerate any human trafficking or modern slavery within its organization or among its vendors and contractors or sub-contractors.

Building on prior efforts, HRH continued its comprehensive compliance program in FY25–26 in response to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). This included vendor outreach, country-of-origin tracking, staff training, performance monitoring, and ongoing engagement with supply chain partners.

HRH is committed to continuous improvement in identifying and addressing forced and child labour risks in its operations and supply chain, and to respecting all human rights in accordance with applicable law.

### 1. Structure, Activities and Supply Chain

HRH is one of Canada’s largest acute care hospitals and is North America’s first digital hospital, operating 729 acute inpatient beds with 4,900 staff and more than 1,000 volunteers, who leverage technology and innovation to serve a diverse catchment area of more than 850,000 people in Northwestern Toronto.

HRH is the merged facility of three (3) previous hospitals: Humber Memorial Hospital, York-Finch Hospital and Northwestern General Hospital, located in Toronto, Ontario, Canada. These three (3) hospitals were part of the Humber River Regional Hospital network. Over time, HRH has expanded services from those provided at the hospital to include the Schulich Family Medicine Teaching Unit, a Research Institute, as well as the Finch and Church Campuses with 469 beds.

HRH continues to grow partnerships, programs and collaborations with healthcare service providers in the Jane and Finch community, including with the Northwestern Toronto Ontario Health Team to establish Community Services to convert six (6) residential homes in the Jane and Finch area into supporting housing units.

HRH is affiliated with the University of Toronto and Queen’s University and is a member of the Toronto Academic Health Science Network (TAHSN), a network of academic health organizations providing leading-edge research, teaching and clinical care.

The Hospital’s approach to healthcare has enabled it to become a national and provincial leader, with a history of many firsts. HRH is recognized globally for leveraging technology to deliver high quality care. HRH uses a custom combination of technology and clinical expertise to rebuild elements of care, making technology work for staff and physicians, giving them more time to spend with patients. HRH is proud to be an incubator for innovation.

HRH is guided by its mission “Working together with our community to deliver innovative, safe and equitable healthcare” and is committed to advancing the empowerment of people and patients, fostering innovation, research, and academics, and delivering comprehensive quality care.

## Structure and Activities

The Supply Chain function is overseen by the Senior Director, with dedicated roles for Procurement, Logistics, and Contracts. Staff such as Buyers, Analysts, and Supervisors are formally assigned compliance duties, including vendor verification and purchase validations.

The North American Industry Classification System (NAICS) Canada 2022 Version 1.0 and The Global Industry Classification Standard (GICS), a global classification standard developed by MSCI in collaboration with S&P Dow Jones Indices, were used to classify the sectors within HRH’s supply chain and related activities.

Sectors within HRH’s supply chain include:

(NAICS): (62) Healthcare and social assistance, (622) Hospitals, (54) Professional, scientific, and technical services. (541) Professional, scientific, and technical services, (53) Real estate and rental and leasing and (532) Rental and leasing services and (44-45) Retail trade.

(GICS) Sector, Industry Group and sub-industries:

- (35) Healthcare, (3510) Healthcare equipment and services, (351010) Healthcare equipment and services, (351020) Healthcare providers and services, (351030) Healthcare technology (3520) Pharmaceuticals, biotechnology, and services (352010) Biotechnology. (352020) Pharmaceuticals. (352030) Life Sciences tools and services
- (60) Real Estate, (6010) Real estate and (601020) Real estate management and development
- (25) Consumer Discretionary, (2550) Retailing, (255040) Specialty Retail
- (30) Consumer Staples, (3010) Food & Staples Retailing, (30101010) Drug Retail, (30101030) Food Retail, (3020) Food, Beverage and Tobacco (302010) Beverages and (302020) Food Products.

HRH’s supply chain includes over 850 vendors across more than 50 countries, supporting both its hospital operations and retail leasing activities. It operates in adherence to Supply Ontario NON-OPS guidelines and aligns with established Vendors of Record.

## Hospital Operations

HRH is a broader public sector organization subject to the Broader Public Sector Accountability Act and the Directives designed to improve accountability and transparency, including in the procurement of goods and services.

HRH's hospital operations supply chain encompasses various areas to ensure prompt delivery of all healthcare services. It starts with procurement, where HRH purchases, consigns, or leases equipment, products, supplies, pharmaceuticals and/or services for each department and upon request to support patient care.

HRH's Just-in-Time (JIT) procurement model, primarily used with Cardinal Health and Medline, ensures real-time purchase order ("PO") creation, scanning controls, and integration with Meditech for accurate tracking. Country-of-origin data is logged for all products in the JIT system.

HRH has inventory management (W-stores) that ensure the availability of essential items while maximizing efficiency of labour, downtime, and waste. For office spaces, HRH has multi-functional devices, mailing machines and technology infrastructure requiring leasing arrangements as well.

HRH directly sells special nutritional goods to patients and medical devices are sold directly within the hospital.

To support hospital operations, HRH contracts with group purchasing organizations used by hospitals and community-based healthcare facilities and directly procures and sources goods and services from international, national, and local manufacturers, distributors, and vendors with the use of customs clearing houses to facilitate the cross-border transactions.

### **Retail Operations**

HRH also leases retail space for its food court, pharmacies, and retail shops. These vendors sell over-the-counter goods directly to patients, visitors, and hospital staff.

HRH also has a unique partnership arrangement through the Reactivation Care Centres (RCC) with multiple hospitals where HRH supplies the product and core services to support the other partner hospitals in providing care to their patients.

Each area of the supply chain plays an important role in facilitating the flow of goods and services. These spaces are maximized for visibility and contribute to the overall needs of the consumers and success of each retail business. Market understanding and active leasing is essential for meeting our customer demands and needs.

These comprise all our healthcare supply chain activities which are vital to the delivery of quality healthcare services economically and effectively.

## **2. Policies and Processes in Relation to Forced and Child Labour**

HRH maintains a hospital-wide Purchasing Policy, Supply Chain Code of Ethics, and a hospital-wide Code of Conduct in which all persons are expected to comply in the workplace and all suppliers are expected to abide by. All employees involved in procurement or supply chain operations are expected to act in an ethical and professional manner and with integrity. Honesty and due diligence are an integral part of the supply chain activities whether internal or external. Furthermore, HRH has regular reviews of human resource-related policies to ensure it remains in compliance with applicable workforce and labour legislation. Regarding its operations, HRH adheres to the provincial employment standards in Ontario such as the Employment Standards Act, Ontario Human Rights Code, Workplace Safety and Insurance Act and the Occupational Health and Safety Act.

During the reporting period, HRH maintained and continued to strengthen its approach to compliance with the Act through ongoing review and enhancement of existing measures:

1. **Vendor Outreach:** Continued engagement with vendors to confirm their compliance status with the Act and identify potential risks to non-compliant manufacturers.
2. **Country-of-Origin Data Collection:** Ongoing collection of manufacturer country-of-origin information for all procured goods and medical devices, led by procurement staff.
3. **Policy Updates:** Maintained and reinforced policies and procedures to:
  - Include annual staff training requirements.
  - Ensure product description forms capture manufacturer origin details.
4. **Training:** Continued delivery of an annual training program for staff involved in procurement activities.
5. **Risk Management:** Leveraged prior reviews and findings to identify, monitor, and address supply chain risks and opportunities.
6. **Remediation Measures:** Sustained efforts to address and remediate potential impacts related to forced or child labour.
7. **Performance Tracking:** Maintained and refined procedures to monitor effectiveness of actions taken to address forced and child labour in the supply chain.
8. **Annual Audits:** Continued to conduct audits, including:
  - Review of policy and procedure.
  - Evaluation of performance metrics such as employee awareness and contract compliance.
9. **Stakeholder Engagement:** Ongoing collaboration with key supply chain partners to address and mitigate risks related to forced and child labour.

## Hospital-wide Purchasing Policy

HRH's Procurement Department is responsible for the purchasing of all supplies, services and equipment required and acquired through Hospital funds. The Hospital-wide Purchasing Policy was developed to provide clear rules regarding the competitive bidding requirements for the acquisition of supplies, services and equipment and the authorized signing authority to commit the Hospital. The Policy applies to all contracts and purchases for the acquisition of supplies, services and equipment and all agreements including (but not limited to) pricing agreements, Memorandums Of Understanding, Letters Of Intent, Service Level Agreements (SLAs) and other documents that commit the Hospital. All procurement procedures have been updated as per Hospital Wide Purchasing Policy, which now incorporates compliance requirements under S-211, Act C-9, and the Building Ontario Businesses Initiative (BOBI).

HRH's Procurement Department conducts its contracting and procurement services based on the following five (5) key principles of the Ontario Broader Public Sector Procurement directives: Accountability, Transparency, Value for Money, Quality Service Delivery and Process Standardization.

The Finance Department is responsible for all vendor setups in Meditech based on requests from Purchasing. All new product submissions to Product Review and Standardization Committee (PRSC) must include manufacturer name and country of origin. This data is maintained in Meditech's Item Master to support risk assessments and S-211 compliance. All POs are communicated to vendors through Electronic Data Interchange (EDI), email, fax, or telephone. Buyers must confirm the manufacturer's country of origin and product details as part of each order confirmation process.

In response to the Act, Procurement & Logistics at HRH will ensure annual staff training, submission of a signed compliance report, collection of country-of-origin data for all products and medical devices, inclusion of compliance language in all procurement contracts and POs, and ongoing due diligence through a self-assessment process.

## Supplier Code of Ethics

HRH expects staff in its Procurement and Supply Chain department to sign a Supply Chain Code of Ethics, which applies to all procurement policies and procedures related to their procurement activities.

HRH's Managed Equipment Services Provider (MESP) is contractually obligated to comply with the Act. This includes adding compliance attestations to RFPs and vendor contracts and supporting related annual training efforts.

For this past financial year, HRH's Policy and Procedure Management Department reviewed and examined all pertinent policies as it relates to the "Act". As part of our commitment to ensuring an ethical, professional, and accountable supply chain, for the upcoming financial year, HRH plans to develop and implement a Supplier Code of Conduct and supporting Conflict of Interest policies. Additionally, HRH introduced updates to the Request for Proposal template (effective April 2024), to include a section on Compliance with Applicable Laws (refer to "Excerpt - HRH's RFP template") and added a section to Contract templates related to *Service Provider's Representations and Warranties* (refer to "Excerpt - HRH's Service Provider contract template").

Currently, HRH's Policy and Procedure Management Department is undertaking an internal assessment to identify if new policies, agreements or amendments to existing agreements will be required for compliance. This comprehensive assessment spans the following contract categories: equipment, services, consumables or extended warranties agreements, affiliation, memorandum of understanding (MOU) agreements, lease agreements and partnership agreements with other hospitals.

### 1.3 Compliance with Applicable Laws

This RFP is subject to the Canadian Free Trade Agreement signed on July 1, 2017 and the Canada-European Union Comprehensive Economic and Trade Agreement (CETA) signed September 21, 2017, which eliminates certain barriers to trade, investment, and labour mobility within Canada and facilitates the free movement of persons, goods, services and investments within Canada.

The successful Proponent shall be required to comply with all laws applicable to purchase and support services in Ontario and the federal laws applicable therein, including but not limited to the Ontario *Occupational Health and Safety Act*, the Ontario *Workplace Safety and Insurance Act*, the Ontario *Human Rights Code*, the Ontario *Pay Equity Act*, the *Personal Health Information Protection Act*, the *Canada Personal Information Protection and Electronic Documents Act*, the *Ontarians with Disabilities Act, 2005* and the *Canada Food and Drugs Act*.

The successful Proponent shall warrant that the goods and services that the proponent is proposing to provide to the HRH are not the result of, and in no way involve, forced labor or child labour (as such terms are defined in Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*—Bill S-211 Act C-9).

### 9.1 Supplier's Representations and Warranties

The Supplier represents and warrants to the Hospital as follows, and acknowledges that the Hospital is relying on such representations and warranties:

- (a) The Supplier has full power and legal right to enter into this Agreement and To fulfill all of its obligations hereunder;
- (b) No bankruptcy, insolvency or receivership proceedings have been instituted or are pending against the Supplier, and the Supplier is able to satisfy its liabilities as they become due;
- (c) Neither the execution and delivery of this Agreement by the Supplier, nor the performance of the Supplier's obligations hereunder, will conflict with, or result in a breach of, or constitute a default under any provision of its incorporating documents or by-laws, any Law, any decree of any court, arbitrator or governmental agency, or any contract, agreement or instrument to which it is a party or subject to, or by which its property is bound or affected;
- (d) There is no proceeding in progress, or pending or threatened against, related to or affecting the Supplier which might be expected to have a materially adverse effect on the Services or impact the Supplier's ability to meet its obligations under this Agreement;
- (e) No authorization, approval or consent of any person is required in connection with the Supplier's execution and delivery of this Agreement and performance of its obligations hereunder;
- (f) The Supplier has the financial capacity to fulfill the terms of this Agreement and has never sought bankruptcy or insolvency protection or had a receiver appointed over its respective assets, has never failed to complete a contractual services/licensing/support agreement to which it was a party because of its lack of financial or human resources, has never been denied credit, has never been in breach of a loan or credit agreement to which it was a party, and has never been denied liability insurance or a business permit; and
- (g) The Supplier has the expertise to perform the Services capably and efficiently.
- (h) The Services and Goods provided by the Service Provider 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*—Bill S-211 Act C-9).

(Above: Excerpt – HRH's RFP template)

(Above: Excerpt – HRH's Service Provider contract template)

## Hospital Code of Conduct

To realize HRH's mission, all employees and physicians are required to perform their duties and functions compassionately, impartially, diligently, efficiently with integrity and in a manner that must always bear public scrutiny.

The Hospital Code of Conduct establishes principles that guide the decision of all Hospital employees and vendors and is intended to promote and maintain respect, dignity, compassion, caring, teamwork, communication, professional accountability, and continuous improvement within an inclusive workplace.

As leaders, Management staff, will counsel individuals promptly when their conduct or behaviour is inconsistent with the intent of the Hospital Code of Conduct. All staff, physicians, vendors, and volunteers are responsible to practice the behaviours described in the Code of Conduct and are accountable to report violations when they occur.

### Additional Measures

In addition to ongoing internal reviews of company policies and contractual relationships across its supply chain, HRH's Procurement team continues to conduct vendor outreach to obtain the following information in writing:

- Vendor attestations confirming compliance with the Act and alignment with current requirements following its implementation;
- Disclosure of any known manufacturers or suppliers that may be non-compliant with their own supply chains, and;
- Country-of-origin for all goods and products procured by HRH.

As responses are received, HRH reviews the information to identify any gaps or areas requiring follow-up within the supply chain.

This work is based on a review of supplier information and findings from vendor outreach activities, helping to identify potential risks, opportunities, and areas for continuous improvement within supply chain processes.

As HRH embarks on the implementation of a new ERP back-office system, it will further develop and integrate procedures to track relevant performance indicators, including employee awareness levels, number of reported cases, and the number of contracts incorporating anti-forced and child labour provisions. In parallel, HRH continues to engage with supply chain partners, subject matter experts, and other stakeholders to support ongoing efforts to address risks related to forced and/or child labour.

### 3. Identification of Forced and Child Labour Risk

To understand where in the supply chain forced or child labour risks may exist, HRH recently carried out a risk assessment process. This process was guided by insights provided by the Walk Free Global Slavery Index, the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct, and by the U.S. Department of Labour's List of Goods Produced by Child Labour or Forced Labour. In conducting our supply chain forced and child labour risk analysis, HRH was able to highlight potential risks of forced or child labour associated with certain goods and certain countries.

This risk identification exercise does not presuppose the actual use of forced or child labour within HRH operations or supply chains, rather, it is aimed at recognizing potential scenarios where such risks might arise, thereby further enabling HRH to implement effective preventative measures. HRH's assessment acknowledges that no industry is entirely exempt from the risks of forced and child labour and there are inherent vulnerabilities within certain sectors of our supply chain, particularly in regions where regulatory frameworks and enforcement mechanisms might not be robust.

HRH's analysis considered specific geographic regions that, according to the Walk Free Global Slavery Index and other credible sources, present a higher risk of forced and child labour practices. This geographic risk assessment, was

combined with an assessment of at-risk-goods categories, further enabling HRH to apply a targeted lens to our risk assessment.

### **Risk Assessment Findings**

Through the application of the analysis, HRH identified suppliers with products in the following countries — China, Mexico, Malaysia, Thailand, India, Dominican Republic, Indonesia, Lithuania, Lao People’s Democratic Republic, Colombia and Poland — as having a heightened risk of forced or child labour. The exercise was conducted using the best available information at the time of the assessment, and Humber River Health acknowledges that the proportion of expenditure by country may change as HRH continues to work with suppliers to improve transparency and sourcing information. Nonetheless, HRH is committed to thoroughly assessing these risks and addressing them with the appropriate level of diligence and responsibility.

In contrast, the majority (approximately 95 percent) of identifiable procurement is associated with countries that have a significantly lower estimated prevalence of forced or child labour. Canada and the United States, for instance, together account for approximately 90 percent of identifiable spend.

HRH also considered the data from the U.S. Department of Labour’s List of Goods Produced by Child Labour or Forced Labour. This is an important step in isolating specific goods from our import portfolio that may be susceptible to forced or child labour. By considering this data alongside the products that HRH imports, it was identified that certain imports from China, India, Mexico, and Malaysia may be associated with an elevated risk of forced or child labour practices. Although the spend associated with these products was approximately 3.5 percent of the identifiable spend, this estimate is based on a high-level mapping and may be refined as additional product-level and supplier-specific information becomes available.

Overall, the findings from the risk assessment indicate that there is exposure to forced and child labour risks within the supply chain in the context of overall expenditures. As it relates to addressing the specific risk identified, please refer to Section 2 of this report which outlines the improvement efforts by HRH’s Policy and Procedure Department and Procurement staff to mitigate these risks, as well as related efforts to enhance and update applicable policies or procedures.

## **4. Remediation of Forced and Child Labour**

HRH has not identified any instances of child or forced labour within its operations or supply chain based on the information available at the time of the assessment. As such, no specific remediation measures were required during the reporting period.

HRH continues to mitigate the potential risk of forced and child labour through the ongoing implementation and enhancement of policies, procedures and due diligence activities outlined in Section 2. These measures are integrated into HRH’s procurement and risk management practices and are subject to regular review and continuous improvement. HRH maintains ongoing monitoring of its supply chain and continues to strengthen its risk assessment processes to support identification, prevention, and mitigation of potential risks.

## **5. Remediation of Loss of Income**

HRH has not identified any instances of child or forced labour in its supply chain or operations and therefore no measures have been taken to remediate the loss of income to vulnerable families.

Following ongoing internal assessments of existing policies, procedures, and our supply chain, if further risk is identified, HRH will take measures to address the impact identified on the hospital and to those who may be affected.

## 6. Employee Training

For the last reporting period, Supply Chain staff were provided with an overview and refresher training on forced labour and child labour as defined in the Act, supporting ongoing awareness and understanding of related risks and responsibilities.

This targeted training is complemented by HRH's broader training framework for procurement staff, which reinforces expectations related to ethical conduct, compliance, and risk management. In this context, HRH provides the following training to all procurement staff:

- Annual mandatory training (Hospital Code of Conduct, Supply Chain Code of Ethics, anti-stigma training, Bariatric sensitivity training, peer-to-peer effective communication training, prevention of workplace violence and harassment training, worker and health and safety awareness training, corporate support staff safety/de-escalation training, confidentiality and privacy training, Cybersecurity training, emergency code training, six IPAC training sessions, WHMIS training)
- Functional or role-based training (orientation for new staff (two days), Department Policy and Procedure Manual (PPM) review, role-specific job shadowing, one-on-one training from supervisor (if required) and refresher training when training content was updated, or system or technology upgrades occurred)

HRH uses a Learning Management System (LMS) to deliver training which will record employee attendance, completeness of training and any attestations that inform HRH's performance review process and staff development.

Going forward, and in alignment with the implementation of the new Supply Chain ERP system, HRH will develop and roll out a training program and acknowledgement process for all staff involved in procurement and requisition activities. This training will be integrated into system onboarding and usage to reinforce expectations related to ethical procurement practices, including considerations related to forced and child labour as defined in the Act.

The training will be supported by HRH's existing policies and procedures and will be designed to promote consistent application of ethical and risk-based decision-making within procurement processes.

Planned outcomes for this specific training include:

- Enhancing awareness and understanding of forced and child labour risks within the procurement process
- Strengthening accountability and compliance through required acknowledgement of procurement-related responsibilities within the ERP system
- Supporting consistent and informed decision-making by integrating ethical considerations into day-to-day procurement activities
- Improving visibility and traceability of procurement practices through system-enabled controls and user engagement

HRH reviews all policies and procedures every two years or as standards or applicable laws change, and annually if it involves occupational health and safety parameters.

## 7. Assessing Effectiveness

HRH has implemented a set of mechanisms to assess the effectiveness of the actions taken to identify, mitigate, and prevent forced labour and child labour risks within its operations and supply chain. These mechanisms continue to be applied and refined in FY 2025-2026 to support ongoing compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Key elements of the effectiveness assessment framework include:

- Annual Monitoring and Audits: HRH conducts annual audits of procurement-related policies, procedures, and contract templates to ensure alignment with legislative requirements. These audits assess adherence to updated practices and identify areas for continuous improvement.
- Performance Indicators Tracking: HRH tracks key performance indicators such as:
  - Number of procurement staff trained on forced and child labour regulations;
  - Percentage of vendor contracts containing anti-forced and child labour clauses;
  - Rate of vendor attestation returns;
  - Number of identified supply chain risks requiring follow-up.
- Vendor Compliance Reviews: All vendors are required to complete an annual attestation regarding their compliance with the Act. Vendor responses, including the identification of country-of-origin for products and any links to high-risk jurisdictions, are reviewed and analyzed to inform risk mitigation strategies.
- Policy Compliance Verification: HRH conducts monthly checks as part of its internal accreditation compliance practices to verify that supply chain-related policies are followed across departments.
- Incident Tracking and Reporting: HRH is implementing procedures to capture and investigate any reported concerns related to forced or child labour. These will inform future remediation and prevention measures.

HRH recognizes that measuring effectiveness is an ongoing process and remains committed to refining its monitoring systems and performance evaluations as new insights and standards evolve. HRH is focused on continuous improvement to ensure transparency, accountability, and integrity in its supply chain.

## 8. Approval and Attestation of the Report

In accordance with the requirements of the Act, and in particular Section 11, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable due 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.

Full Name: Barbara Collins

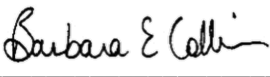
Full Name: Serge Gattesco

Title: President & CEO

Title: Chair, Board of Directors

Date: May 27, 2026

Date: May 27, 2026

Signature: 

Signature: 

"I have the authority to bind Humber River Health."

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