

Joint Report – Fighting Against Forced Labour and Child Labour in Supply Chains Act

May 30, 2024

Prepared as a joint report for:

Clearpoint Health Network Inc.

Canadian Surgery Solutions Ltd.

Chirurgie Dix30 Inc.

Clearpoint Health Quebec Inc./Sante Clearpoint Health Quebec Inc.

Clearpoint Quebec Brossard Holdings Inc.

Don Mills Surgical Centres Ltd.

Don Mills Surgical Unit Limited

False Creek Health Care Centre Inc.

Surgical Centres Inc.

Surgical Partners of Ontario Inc.

Surgical Solutions Network Inc.

The Surgical Weight Loss Centre Inc.

Vancouver Urgent Care Centre Inc.

Winnipeg Surgery Centre Ltd.

This Report on Modern Slavery (the “**Report**”) has been prepared as a joint report by Clearpoint Health Network Inc.’s (“**Clearpoint**”) group of companies pursuant to the reporting requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Act**”). This Report describes the steps Clearpoint has taken during the period beginning on January 1, 2023, and ending on December 31, 2023 (“**Fiscal 2023**”) to prevent the use of forced labour and child labour in its activities and supply chains. In this Report, “we”, “us”, “our”, “Clearpoint” and “the company” means collectively the Clearpoint group of companies. This joint report has been prepared for the following entities:

- Clearpoint Health Network Inc.
- Canadian Surgery Solutions Ltd.
- Chirurgie Dix30 Inc.
- Clearpoint Health Quebec Inc./Sante Clearpoint Health Quebec Inc.
- Clearpoint Quebec Brossard Holdings Inc.
- Don Mills Surgical Centres Ltd.
- Don Mills Surgical Unit Limited
- False Creek Health Care Centre Inc.
- Surgical Centres Inc.
- Surgical Partners of Ontario Inc.
- Surgical Solutions Network Inc.
- The Surgical Weight Loss Centre Inc.
- Vancouver Urgent Care Centre Inc.
- Winnipeg Surgery Centre Ltd.

Corporate Structure & Activities

Clearpoint is Canada’s largest independent surgical partner that conducts select elective and non-emergency surgeries to help alleviate pressure on the public health system.¹ Clearpoint is incorporated under the *Business Corporations Act (British Columbia)* and its head office is located at 1599 Hurontario Street Suite 302 Mississauga ON L5G 4S1.

We continue to evaluate the creation of a program to work with our partners to ensure that they continually evolve and strengthen their broad-based human rights due diligence processes. As part of our Vendor Code of Conduct, our partners are required to create their own standards for suppliers with guidance on how its suppliers should establish policies and management systems to identify and address human rights impacts, and metrics to measure and audit its supply chain for human right and forced labour violations. The policies are intended to prohibit the use of any forced or bonded labour in the manufacture of any product, or any component of a product and is compliant with the Act.

¹ Further information about Clearpoint Health Networks can be found at the following link:
<https://www.clearpointhealth.ca/about/>

Policies and Processes Relating to Forced Labour and Child Labour

Clearpoint is committed to supporting and working with qualified organizations (e.g. suppliers) that have robust Environmental, Social and Governance (ESG) programs in place. Clearpoint's ESG program focuses on several key areas including:

- **Environmental:** how the supplier and its supply chain are reducing its impact on the environment.
- **Social:** the supplier's policies and reporting on socially responsible sourcing.
- **Community Advancement:** How the organization is working to better the communities that it manufactures in.

We are committed to ensuring that our supply chain reflects our core values and our ESG priorities. The vendor partners that we work with must align with Clearpoint's ESG program structure. This includes having processes in place by the vendor to meet Clearpoint's Vendor Code of Conduct Requirements ("Code of Conduct") which specifically addresses the use of forced labour and child labour by the vendor. This document sets forth the expectation of vendors that do business with Clearpoint.

To help us deliver on the high-quality standards that our patients expect from Clearpoint Health Network, we seek relationships with supply partners who commit to the principles outlined in our Vendor Code of Conduct which would include a commitment for adhering to the USA denied Supplier list.² These Standards outline our expectations on several important topics and are integral to our supplier-selection process, helping us build a supply base that shares our commitment to strong ethics, quality, and global citizenship. This Code of Conduct will be updated periodically to align with current best practices, market trends and our own internal advances.

Areas of Risk

Clearpoint's supply chain practices are low risk with respect to forced labour or child labour being used in its supply chain. We do not directly manufacture any goods that are used within our facilities and all products are purchased from partners that include distributors, retailers, and direct vendors. Almost all of Clearpoint's vendor partners are in Canada and the remainder in the U.S. Clearpoint vendor partners are large distributors and retailers that would likely have implemented ESG procedures to evaluate compliance and regulatory risk. Clearpoint primarily purchases products from distributors and retailers in Canada, and a small number of direct vendors in Canada. Clearpoint has taken steps to reach out to its largest vendor partners to determine the type of ESG practices that are currently being practiced and whether these practices evaluate the use of forced labour or child labour risk in the vendors' supply chain. Clearpoint will continue to improve its ESG practices and implement procedures to reduce the risk of the forced labour or child labour in its supply chain. We generally consider the risk of forced labour and/or child labour in our operations and supply chains to be low.

² For more information on denied party screening please refer to the following article:
<https://www.descartes.com/resources/knowledge-center/what-is-denied-party-screening>

Remediation

During Clearpoint's most recently completed Fiscal Year, no forced labour or child labour circumstances arose that require the implementation of remediation measures. As Clearpoint has not undertaken any such remedial measures, its activities have not impacted or otherwise resulted in loss of income for such families.

Training

Each new employee must sign an acknowledgement upon joining our organization that they have read and understood our code of conduct; complete mandatory "Respect in the Workplace" training, including our values and policies. Our Code of Conduct and Respect in the Workplace training informs employees on what acceptable forms of behaviour is and how to report wrongdoing within our organization. This also includes how to interact with our suppliers and contractors that work with our organization. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge on topics relevant to our business. Our employee handbook is housed on the Intranet, which is the first page that all employees land when they log into our IT network. The employee handbook is also reviewed with new hires and current employees. The code of conduct is also available in the employee handbook.

Effectiveness of Our Approach

As part of our governance processes, we monitor compliance with our policies on an ongoing basis. We also review any concerns raised through our employee feedback mechanisms. To date, no significant concerns have been identified.

We continue to evaluate the effectiveness of our program by:

- Identifying risks: communicating directly with our vendors to identify risk (i.e. is the vendor aware for the Forced Labour or similar legislation, what are vendors processes for identifying, assessing and addressing unethical practices such as forced labour and child labour;
- Perform due diligence: for individual vendors, request vendor code of conducts, and third party risk management policies and practices where available; and
- Vendor Code of Conduct – Written policies for suppliers that clearly outline standards and expectations for ethical behavior regarding labor, health and safety and the environment.

Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of Directors of Clearpoint Health Networks Inc. which controls the Clearpoint group of companies, including Clearpoint Health Network Inc., Canadian Surgery Solutions Ltd., Chirurgie Dix30 Inc., Clearpoint



Health Quebec Inc./Sante Clearpoint Health Quebec Inc., Clearpoint Quebec Brossard Holdings Inc., Don Mills Surgical Centres Ltd., Don Mills Surgical Unit Limited, False Creek Health Care Centre Inc., Surgical Centres Inc., Surgical Partners of Ontario Inc., Surgical Solutions Network Inc., The Surgical Weight Loss Centre Inc., Vancouver Urgent Care Centre Inc., and Winnipeg Surgery Centre Ltd.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for Fiscal 2023.

I make the above statement in my capacity as a member of the Board of Directors of Clearpoint for and on behalf of the Board of Directors.

Dated this 30th, day of May, 2024.

Clearpoint Health Networks Inc.

Per: "Kirk Hamilton"

Name: Kirk Hamilton

Title: Director

I have the authority to bind
Clearpoint Health Network Inc.