

May 31, 2025

## **Southeast Ontario Academic Medical Organization**

### **Modern Slavery Act Report (Fiscal Year 2024)**

This report is prepared by Southeastern Ontario Academic Medical Organization (“**SEAMO**”, “**we**”, “**us**”, or “**our**”) in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “**Act**”). It addresses the reporting period from May 1, 2024, to April 30, 2025 (“**FY2024**”).

## **1. Our Structure, Activities, and Supply Chain**

### **Structure**

SEAMO is an unincorporated association created in 1994 by an agreement between:

- (i) the Clinical Teachers’ Association of Queen’s University (“**CTAQ**”);
- (ii) Kingston Health Sciences Centre (“**KHSC**”);
- (iii) Providence Care Centre (“**Providence Care**”); and
- (iv) Queen’s University at Kingston (“**Queen’s University**”).

SEAMO is governed by two committees that are comprised of representatives from each of SEAMO’s member organizations. SEAMO itself had no employees in FY2024. Further information about the structure/governance of SEAMO can be found on our website at [www.seamo.ca](http://www.seamo.ca).

SEAMO was created to assist in resource allocation and enable the delivery of clinical service, health education, and research under a funding agreement between SEAMO’s members and the Ontario Ministry of Health and Long-Term Care.

SEAMO’s mission is to support the delivery of outstanding health care, foster excellence in research and education, and facilitate the transformation of academic medicine in Southeastern Ontario. SEAMO’s strategic plan is set out on our website at Strategic Plan 2022-2027 | Southeastern Ontario Academic Medical Organization ([seamo.ca](http://seamo.ca)).

### **Activities**

SEAMO provides funding for 13 clinical departments and over 440 physicians practicing in 30 specialties across our member organizations. These departments provide patient care, educate future health professionals, and are actively involved in health-related research and medical leadership. SEAMO also supports its members through the procurement and provision of a broad range of goods. In FY2024, SEAMO’s purchases included information and telecommunication technology, hardware, and software, laboratory supplies, food services, accommodation for staff travelling, and office supplies.

SEAMO operates and shares office space, financial support services (including payroll, procurement, accounting/bookkeeping) IT systems and support, and human resource systems

and policies, and procurement policies with Queen's University. SEAMO operates and shares offices space, IT systems, and IT software with KHSC and Providence Care.

### **Supply Chain**

SEAMO's goods in FY2024 were all procured using Queen's University's procurement system. In FY2024, SEAMO spent approximately \$502,000 on goods (as per SEAMO's audited financial statement) from 50 suppliers. All of SEAMO's first-tier suppliers in FY2024 were located in Canada.

## **2. Policies and Due Diligence Processes**

As SEAMO does not have any employees and exclusively uses Queen's University's procurement system to purchase all of its goods, SEAMO does not have any of its own policies and due diligence processes in relation to forced and child labour. However, all of Queen's University's policies applicable to reducing forced and child labour and its supply chain are applicable to SEAMO's supply chain. Queen's University's procurement system contains only suppliers that Queen's University has approved in compliance with its own policies and due diligence processes.

As a public sector organization in the province of Ontario, Queen's University is required to comply with various legislation including federal trade treaties. Ethical practices are included in Queen's University's procurement processes (e.g. open competition) if there is a known risk of use of forced labour or child labour (e.g. apparel). For example, Queen's University implemented a Social and Sustainable Procurement section to all of its open competitive tendering processes. This requires suppliers to provide Queen's University with information about the organization's pay practices and policies and practices relevant to human rights, forced labour and child labour, animal rights, employee wellbeing, community impact, and fair trade. Queen's University has also adopted the Ontario Broader Public Sector ("BPS") Procurement Directive and the BPS Procurement Code of Ethics, which among other things, requires all supply chain participants to comply with the Code of Ethics and the laws of Canada and Ontario.

Where there are genuine concerns of improper acts within Queen's University's business or supply chains, SEAMO understands that Queen's University employees are encouraged to report under its Improper Acts Reporting Policy. This policy covers improper acts not addressed under other university policies or procedures. This policy permits university community members to raise concerns about a supply chain or an individual who may be at risk.

As of FY2024, Queen's University has improved their procurement system through the development and implementation of a Queen's Supplier Code of Conduct ("Code of Conduct"). This serves as the foundation for promoting ethical behaviour, environmental stewardship, social responsibility, and integrity within Queen's supply chain. The Code of Conduct objectives are to:

- Establish minimum conduct standards for Suppliers, with the expectation that they will surpass industry benchmarks and best practices.

- Foster proactive engagement and collaboration between Queen's and its Suppliers to drive continuous improvement in ethical, social, and environmental performance.
- Enhance transparency, accountability, and trust among all stakeholders involved in Queen's procurement and supply chain process.

### **3. Risk of Forced Labour or Child Labour in our activities and supply chains**

We recognize that we may be indirectly linked to a risk of modern slavery because of our business activities, and that certain sectors in our supply chain (including the procurement of technology, medical and office supplies, food catering, office furniture/equipment) may pose a higher risk of modern slavery. That said, SEAMO's immediate suppliers are all based in Canada, which along with its provinces and territories, generally have pre-existing and robust labour, employment, and human rights legislation that helps to mitigate the risk of modern slavery in our operations and supply chain. SEAMO also relies on Queen's University's policies and due diligence to manage risks of modern slavery in our supply chain.

### **4. Our Remediation Measures in FY2024**

In FY2024, we did not identify any incidents of forced labour or child labour in our supply chains or business, or any loss of income experienced by the most vulnerable families resulting from our prevention and mitigation measures against forced/child labour. We have accordingly not taken any corresponding remedial measures. If a situation of non-compliance is identified in the future, we are committed to implementing remediation measures to correct the situation and improve the enforcement of our prevention measures within our business and supply chain.

### **5. Training**

As SEAMO did not have any employees in FY2024, SEAMO did not provide training on forced labour and/or child labour.

### **Assessment of effectiveness**

As SEAMO exclusively uses Queen's University's procurement system to procure all goods paid for by SEAMO in FY2024, SEAMO relies on Queen's University to assess effectiveness in ensuring that forced labour and child labour are not being used in SEAMO's supply chain. SEAMO itself did not take any independent measures in FY2024 to assess Queen's University's effectiveness.

SEAMO understands Queen's University gathers information on the risk of forced or child labour in its supply chains through the social procurement questions included in its procurement documents. These questions require suppliers to provide Queen's University with information about the organization's pay practices and policies and practices that consider human rights,

animal rights, employee wellbeing, community impact, and fair trade. SEAMO understands that responses to these questions assist Queen's University in taking appropriate steps to manage and mitigate these risks if and as needed.

## **6. Approval of Report**

This Report was approved by SEAMO's Governing Committee on April 7, 2025 pursuant to paragraph 11(4)(a) of the Act and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at [www.seamo.ca](http://www.seamo.ca).

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



\_\_\_\_\_  
Signature

\_\_\_\_\_  
April 8, 2025

Date

I have authority to bind SEAMO

Dr. Stephen Vanner

CEO, SEAMO