

# Public Safety Canada – Forced Labour in Canadian Supply Chains Report

Prepared by: Canadian Orthodontic Partners Corp.

May 31, 2024

## **Overview of the Report**

---

This report was prepared for the minister of Public Safety in response to the requirements set out in [Bill S-211, \*An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act.\*](#)

The report questionnaire asks for the following identifying information about the entity and about the report:

- Reporting entity's legal name: Canadian Orthodontic Partners
- Financial reporting year: 2023
- Business numbers: 744869322RT0001
- Entity categorization according to the Act: Practice Management  
(Healthcare, Dental) Sector/industry
- Location: Canada
- Number of employees in Canada: 520

## **Abstract of Company**

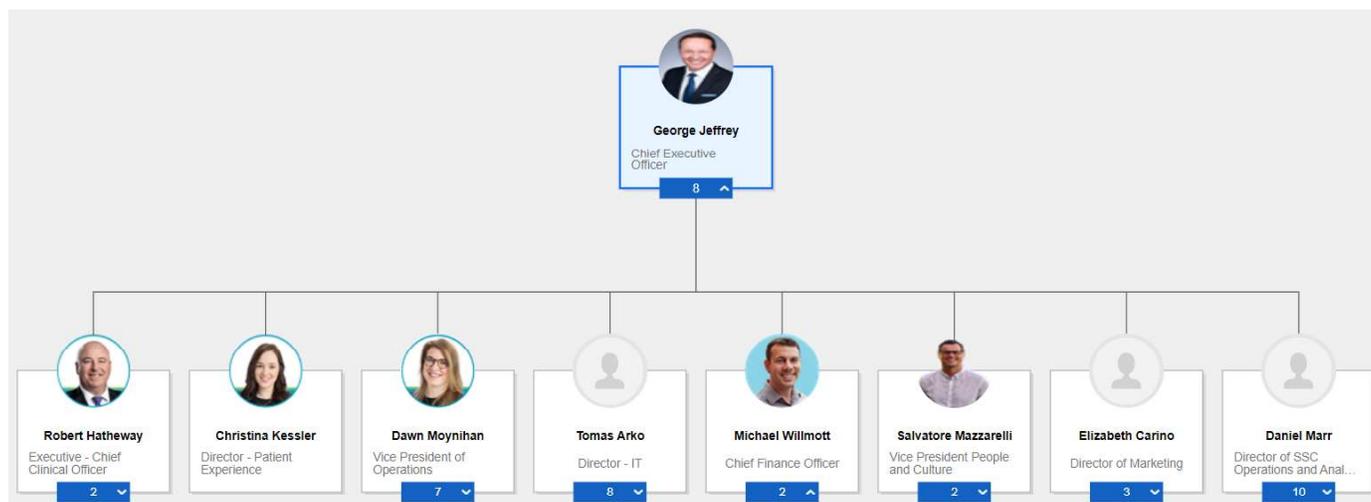
**Canadian Orthodontic Partners (COP)** operates support services for its national network of community-based orthodontic clinics — so the clinic teams can focus on delivering world-class orthodontic care and beautiful, confident new smiles. Being in the confidence business means actively building confidence in every patient through personalized care, and amongst teammates through knowledge sharing and collaboration. Every day is an opportunity to learn and grow, and COP intends to make the most of it. The Canadian Orthodontic Partners Vision is to become the icon of orthodontic excellence in Canada.

### 3.0 Supplementary Information (a) – Structure, activities, and supply chains

#### Legal Structure

	Province	Provincial Entity	Business Number
Canadian Orthodontic Partners Corp. COP/head office - 744869322			
	AB	John E. McManaman Professional Corporation	742023690
	BC	Dr. John McManaman Dental Corporation	756558714
	MB	Dr. McManaman Dental Corporation	724151089
	NB	Dr. John McManaman NB PC	795755743
	NS	Dr. McManaman Dental Inc.	786768143
	ON	Dr. John Edward McManaman Dentistry PC	745663898
	PEI	Dr. John McManaman (PEI) PC	794936542
	YK	Robert Hatheway (Yukon) Professional Corporation	742144488

#### Organizational Structure



COP’s supply chain encompasses suppliers of goods and services integral to the production, sale, distribution, and importation of goods by COP, spanning from the procurement of final product. This encompasses both direct and indirect suppliers and service providers, operating within and outside Canada. Notably, an entity’s supply chain excludes end users or customers who procure its products or services.

COP’s supply chain consists of core suppliers directly engaged in providing essential goods and services vital to the operational functions of the orthodontic dental practice. These primary

suppliers typically encompass distributors, and service providers with a few direct manufacturers.

Within the Tier 1 supply chain, orthodontic dental practices interface directly with suppliers responsible for furnishing a broad spectrum of goods and services, ranging from dental materials and instruments to equipment maintenance and repair services. These suppliers play a pivotal role in ensuring the seamless flow of essential resources, thereby enabling the efficient delivery of dental care services.

Characterized by close partnerships and strategic collaborations, the Tier 1 dental practice supply chain operates within a framework of reliability, responsiveness, and quality assurance. Through effective management and collaboration with Tier 1 suppliers, orthodontic dental practices optimize operational efficiency, uphold clinical standards, and enhance patient care outcomes.

COP's top Tier 1 suppliers are listed below;

Align Technology Inc.	Align Technology, Inc. is an American manufacturer of 3D digital scanners and Invisalign clear aligners used in orthodontics. It was founded in 1997 and is headquartered in Tempe, Arizona. The company manufactures the aligners in Juarez, Mexico, and its scanners in Israel and China.	Manufacturer, America	<a href="https://www.aligntech.com/">https://www.aligntech.com/</a>
American Orthodontics	AO is registered with the FDA and its quality systems are certified to ISO 13485:2016, European Union MDR 2017/745, and Medical Device Single Audit Program (MDSAP), a program that demonstrates compliance in Australia, Brazil, Canada, Japan and the United States. AO manufactures brackets, wires, elastomers, adhesives and instruments	Manufacturer, American	<a href="https://www.americanortho.com/">https://www.americanortho.com/</a>
Orthodontic Supply of Canada Inc (OSC)	Since beginning operations in 1983, Orthodontic Supply of Canada (OSC) is one of Canada's largest independent distributor of orthodontic product. OSC distributes brackets, wires	Distributor, Canadian	<a href="https://www.orthosupply.ca/en/">https://www.orthosupply.ca/en/</a>
3M Unitek Corporation	3M is one of COP's partnered manufacturer and distributor of orthodontic product. 3M manufactures and distributes brackets, wires, elastomers, adhesives, restorative products and lab materials	Manufacturer, American	<a href="https://www.3mcanada.ca/3M/en_CA/orthodontics-ca/">https://www.3mcanada.ca/3M/en_CA/orthodontics-ca/</a>
Sinclair Dental	Supplying over 20,000 items Sinclair is a one stop company for our networks most commonly used items. Sinclair supplies adhesives, bonds, restoratives, disposables, infection control, instruments and tools.	Distributor, Canadian	<a href="https://www.sinclairdental.com/">https://www.sinclairdental.com/</a>
Maxill	Maxill is a manufacturer direct business model that offers a solid range of top volume usage products in key dental categories such as: Oral care, hygiene, infection control, disposables, instruments, PPE, sterilization and restoration products	Manufacturer, Canadian	<a href="https://www.maxill.com/ca/">https://www.maxill.com/ca/</a>
Henry Schein	Henry Schein, Inc. is an American distributor of health care products and services with a presence in 32 countries. Oral care, hygiene, infection control, disposables, instruments, PPE, sterilization and restoration products	Distributor, American	<a href="https://www.henryschein.ca/">https://www.henryschein.ca/</a>
Cerum Ortho Organizers	Cerum Ortho are leaders in the areas of Class II correction, Self-Ligation Brackets and Metal injection mold technology	Manufacturer, Canadian	<a href="https://www.aurumgroup.com/brands/cerum-ortho-organizer">https://www.aurumgroup.com/brands/cerum-ortho-organizer</a>

### **Supplementary Information (b) – Policies and due diligence process**

---

COP adopts responsible business practices in their operations to mitigate risks and use their influence to reduce risks throughout their supply chains. Examples include;

- COP uses a diversified supplier base
  - Building strong supplier relationships
  - Request supplier attestations on their products conformity to Bill S-211
- 

### **Supplementary Information (c) – Forced labour and child labour risks**

---

COP strongly relies on the network to only procure from our approved supplier master. Suppliers of direct materials and services to our network meet the requirements of COP standards and policies. These requirements are in addition to any purchase order terms and conditions.

COP suppliers of medical devices meet Health Canada *Medical Devices Regulations*.

Many of the medical devices we use in dentistry require authorization by Health Canada (by way of a device licence) before they can legally be sold in Canada. The *Medical Devices Regulations* prohibit dental laboratories or dental health care practitioners from importing certain types of medical devices (i.e., Class II, III and IV devices) that are not licensed in Canada. Dental tools, including dental instruments and equipment, dental restoratives and dentures are considered to be medical devices.

---

### **Supplementary Information (d) – Remediation measures**

---

COP has assessed that their activities and supply chains do not carry a risk of forced labour or child labour being used, remediation is considered not applicable.

---

### **Supplementary Information (e) – Remediation of loss of income**

---

COP has judged that vulnerable families have not experienced loss of income as a result of steps the entity has taken to eliminate forced labour or child labour risks.

---

### **Supplementary Information (f) – Training**

---

COP has not provided formal training to employees on forced and child labour, to date.

---

### **Supplementary Information (g) – Assessing effectiveness**

---

COP has confidence that we've fully reduced the risk of forced labour and child labour within our supply chains.

## Governing Body Attestation Form

1. 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.”

This attestation statement  
is made by



---

George Jeffrey, I have the authority to bind Canadian  
Orthodontic Partners Corp.

---

*Name of office holder/member of Governing Body*

Holding the  
position/office on the  
Governing Body

Chief Executive Officer

---

*Title of officeholder/member of Governing Body*

For and on behalf of the  
governing body titled

The Board of Directors of Canadian Orthodontic Parnters Corp.

---

*Governing body's title (the Governing Body)*

1. The Governing Body has fully complied with the requirements of Bill S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act
2. I have the full authority of the Governing Body to make this statement.
3. All other members of the Governing Body support the making of this attestation statement on its behalf.