

Public Safety Canada – Forced Labour in Canadian Supply Chains Report

Prepared by: Canadian Orthodontic Partners Corp.

May 31, 2025

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: 2024
- Business numbers: 744869322RT0001
- Entity categorization according to the Act: Practice Management (Healthcare, Dental) Sector/industry
- Location: Canada
- Number of employees in Canada: 559

Abstract of Company

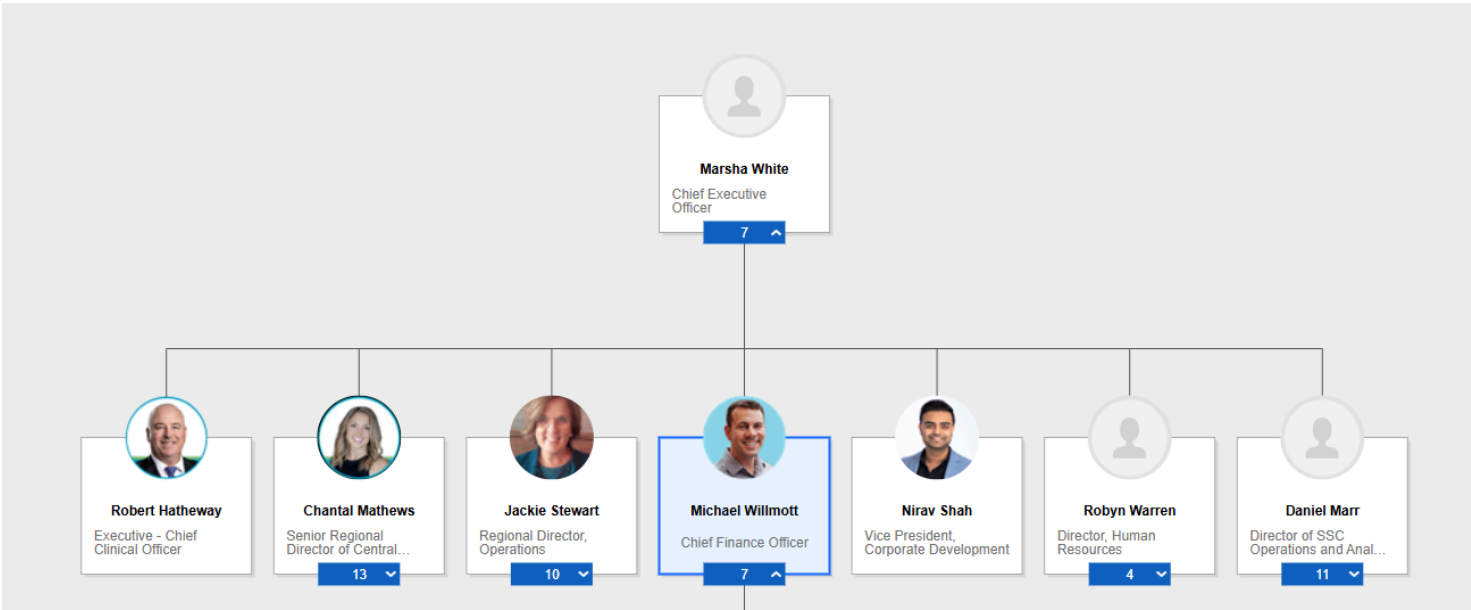
Canadian Orthodontic Partners (COP) operates support services for its national network of community-based orthodontic clinics — so the clinic teams can focus on delivering world-class orthodontic care and beautiful, confident new smiles. Being in the confidence business means actively building confidence 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

Provincial Entity	Business Number
ON Canadian Orthodontic Partners Corp. (COP head office)	744869322
BC Dr. Robert Hatheway Dental Corporation	756558714
AB Robert Hatheway Professional Corporation	742023690
MB Dr. Robert Hatheway (Manitoba) Dental Corporation	724151089
ON Dr. Robert Hatheway Dentistry Professional Corporation	745663898
NB Dr. Robert Hatheway NB Professional Corporation	795755743
NS Dr. Hatheway Dental Inc.	786768143
PEI Dr. Robert Hatheway PEI Professional Corporation	794936542
YK Robert Hatheway 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	https://www.aligntech.com/
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	https://www.americanortho.com/
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	https://www.orthosupply.ca/en/
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	https://www.3mcanada.ca/3M/en_CA/orthodontics-ca/
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	https://www.sinclairdental.com/
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	https://www.maxill.com/ca/
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	https://www.henryschein.ca/
Cerum Ortho Organizers	Cerum Ortho are leaders in the areas of Class II correction, Self-Ligation Brackets and Metal injection mold technology	Manufacturer, Canadian	https://www.aurumgroup.com/brands/cerum-ortho-organizers/

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.

COP is developing language to be included in its requests for proposals and forms of vendor contracts for new suppliers to confirm that potential suppliers do not engage in forced labour and or child labour. COP is also requesting supplier attestation of Bill S-211 from our Tier 1 existing suppliers.

Additional Questions

Questions marked with an asterisk (*) are mandatory.

1. *This report is for which of the following? (Required)

Entity

2. *Legal name of reporting entity or government institution (Required)

Canadian Orthodontic Partners

3. *Financial reporting year (Required)

2024

4. *Is this a revised version of a report already submitted this reporting year? (Required)

No

4.1 *If yes, identify the date the original report was submitted. (Required)

Not applicable

4.2 *Describe the changes made to the original report, including by listing the questions or sections that were revised (1,500 character limit). (Required)

Not applicable

5. For entities only: Business number(s) (if applicable):

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6. For entities only: *Is this a joint report? (Required)

Yes

6.1 *If yes, identify the legal name of each entity covered by this report. (Required)

Canadian Orthodontic Partners Corp. COP/head office

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MB	Dr. Robert Hatheway (Manitoba) Dental Corporation
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PEI	Dr. Robert Hatheway PEI Professional Corporation
YK	Robert Hatheway Professional Corporation

6.2 Identify the business number(s) of each entity covered by this report (if applicable).

ON	Canadian Orthodontic Partners Corp. (COP head office)	744869322
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7. For entities only: *Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Required)

No

7.1 *If yes, indicate the applicable law(s). Select all that apply. (Required)

Not applicable

8. For entities only: *Which of the following categorizations applies to the entity? Select all that apply. (Required)

Canadian business presence (select all that apply):

Listed on a stock exchange in Canada:	Not applicable to COP
Has a place of business in Canada:	Applicable to COP
Does business in Canada:	Applicable to COP
Has assets in Canada:	Applicable to COP

Meets size-related thresholds (select all that apply): Has at least \$20 million in assets for at least one of its two most recent financial years Has generated at least \$40 million in revenue for at least one of its two most recent financial years. Employs an average of at least 250 employees for at least one of its two most recent financial years

9. For entities only: *Which of the following sectors or industries does the entity operate in? Select all that apply. (Required)

Practice Management (Health Care, Dental)

10. For entities only: *In which country is the entity headquartered or principally located?(Required)

Canada

10.1 If in Canada: *In which province or territory is the entity headquartered or principally located? (Required)

Ontario

11. For government institutions only: *Is this a report for a federal Crown corporation or a subsidiary of a federal Crown corporation? (Required)

Not applicable

11.1 *If yes, which of the following sectors or industries does the Crown corporation or subsidiary operate in? Select all that apply. (Required)

Not applicable

11.2 *If yes, in which province or territory is the Crown corporation or subsidiary headquartered or principally located? (Required)

Not applicable

Annual Report

Reporting for entities

1. *What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Required)

Mapping supply chains

Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
Developing and implementing child protection policies and processes

Developing and implementing anti-forced labour and/or child labour contractual clauses

Monitoring suppliers through contract review

2. Please provide additional information describing the steps taken (if applicable) (1,500 character limit).

Requesting supplier attestation of Bill S-211 of our Tier 1 and Tier 2 suppliers

3. *Which of the following accurately describes the entity's structure? (Required)

Corporation

4. *Which of the following accurately describes the entity's activities? Select all that apply. (Required)

Selling goods & services in Canada

5. Please provide additional information on the entity's structure, activities and supply chains (1,500 character limit).

No additional relevant information not previously stated

6. *Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

No

6.1 *If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

Not applicable

7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500 character limit).

Assessing our supply chains;

Prioritize, with the help of our key suppliers we identify general areas in our supply chain where the risk is most significant. We consider which products we buy, where they are coming from and the associated risk profile.

Mapping our supply chains by identifying our relevant suppliers / vendors and speaking to these suppliers, regarding the mapping of their supply chain. Our Tier 1 suppliers are the manufacturer, we source directly from our Tier 1 suppliers.

8. *Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)

Not applicable

8.1 *If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Required)

Not applicable

9. *Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Required)

No

10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit).

Not applicable

11. *Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

11.1 *If yes, which remediation measures has the entity taken? Select all that apply. (Required)

Not applicable

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).

Not applicable

13. *Has the entity 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? (Required)

Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

14. Please provide additional information on any measures the entity has taken 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 (if applicable) (1,500 character limit).

Not applicable

15. *Does the entity currently provide training to employees on forced labour and/or child labour? (Required)

No

15.1 *If yes, is the training mandatory? (Required)

Not applicable

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit).

Not applicable

17. *Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Required)

No

17.1 *If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Required)

Not applicable

18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).

Not applicable

At COP we've established a supply network that relies on key supplier relationships between buyers and suppliers. Knowing our suppliers gives us the confidence and reliability that we've grown to rely upon. Our Tier 1 supply base agreements are formed only with suppliers compliant to Canada's Bill S-211 monitored through submission of attestations.

Some of the key attributes to selecting the right supply partners includes;

Quality control - The further removed a supplier is from your organization, the harder it is to maintain quality if you don't have the right controls in place. We rely on several Tier 1 orthodontic suppliers to keep quality as our main focus.

Ethics concerns - Working with the top supplies in the industry we gain confidence that our suppliers are not involved with inhumane working conditions, human trafficking, or other unethical behaviors.

Legal ramifications - Working with ethical companies reduces our exposure to any liability for our contractors, we are confident our contractors work within current labor laws.

Social Responsibility - Our suppliers are chosen and valued for their commitment to environment, social and governance programs.

Cybersecurity - COP has a strict level of digital security protocols, and utilizes third party support to ensure cybersecurity.

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

Marsha White

Marsha White, 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 Partners 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.