

Forced Labour in Canadian Supply Chains

Amp Solar Group Inc. 2023 Report

Adhering to Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (formerly known as Bill S-211), this report aligns with the published questionnaire and includes the required attestation with the necessary signature(s).

If you have any questions or require further clarification on any of the information presented below, please do not hesitate to contact us at info@amp.energy.

Questionnaire

1. This report is for which of the following?

☒ Entity

☐ Government Institution

2. Legal name of reporting entity or government institution: Amp Solar Group Inc.

3. Financial reporting year: 2023

4. Is this a revised version of a report already submitted this reporting year?

☐ Yes

☒ No

5. Business number(s) (if applicable): Ontario Corporation Number: 1000063342

6. Is this a joint report?

☐ Yes

☒ No

7. Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?

☐ Yes

☒ No

8. Which of the following categorizations applies to the entity? Select all that apply.

☐ Listed on a stock exchange in Canada

☒ Has a place of business in Canada

☐ Canadian business presence
(select all that apply):

☒ Does business in Canada

☒ Has assets in Canada

Meets size-related thresholds (select all that apply):

☒ Has at least \$20 mil in assets for at least one of its two most recent financial years

☒ Has generated at least \$40 mil in revenue for at least one of its two most recent financial years

☐ Employs an avg of at least 250 employees for at least one of its two most recent financial years

9. Which of the following sectors or industries does the entity operate in?

Select all that apply.

☐ Agriculture, forestry, fishing, and hunting

☐ Management of companies & enterprises

☐ Mining, quarrying, and oil & gas extraction

☐ Administrative and support, waste management and remediation services

☒ Utilities

- | | |
|---|--|
| <input type="checkbox"/> Construction | <input type="checkbox"/> Educational services |
| <input type="checkbox"/> Manufacturing | <input type="checkbox"/> Health care and social assistance |
| <input type="checkbox"/> Wholesale trade | <input type="checkbox"/> Arts, entertainment, and recreation |
| <input type="checkbox"/> Retail trade | <input type="checkbox"/> Accommodation and food services |
| <input type="checkbox"/> Transportation and warehousing | <input type="checkbox"/> Other services (except public administration) |
| <input type="checkbox"/> Information and cultural industries | <input type="checkbox"/> Public administration |
| <input type="checkbox"/> Finance and insurance | <input checked="" type="checkbox"/> Other, please specify:
Renewable Energy Development |
| <input type="checkbox"/> Real estate and rental and leasing | |
| <input checked="" type="checkbox"/> Professional, scientific & technical services | |

10. In which country is the entity headquartered or principally located? Ontario, Canada

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.

- ☒ Mapping activities
- ☒ Mapping supply chains
- ☒ Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- ☐ Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- ☐ Developing and implementing an action plan for addressing forced labour and/or child labour
- ☐ Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- ☐ Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour
- ☒ Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- ☐ Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- ☒ 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
- ☒ Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists

- ☐ Auditing suppliers
- ☒ Monitoring suppliers
- ☐ Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
- ☐ Developing and implementing grievance mechanisms
- ☒ Developing and implementing training and awareness materials on forced labour and/or child labour
- ☐ Developing and implementing procedures to track performance in addressing forced labour and/or child labour
- ☒ Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
- ☐ Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour
- ☐ Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks
- ☐ Information not available for this reporting period
- ☐ Other, please specify:

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

In 2022, Amp officially rolled out a sustainability-focused procurement policy in the US, with the subsequent goal of expanding it globally. This policy endorses transparent, objective, and ethical purchasing processes that comply with local laws and support economic, social and environmental progress. Labour and Human Rights are fundamental pillars of this policy, encompassing commitments such as refraining from actions that undermine universal human rights, ensuring a discrimination-free work environment, rejecting all forms of forced labour and harassment, and complying with labour laws that prohibit forced or child labour in operational activities across different countries.

To comply with our new policy, we mapped all our major service and equipment providers. We then sent each provider a detailed questionnaire, seeking assurances regarding their labour practices and material sourcing. Specifically, we inquired about the measures taken to prevent unethical practices such as child labour, prison labour, and coercion, as well as to avoid materials sourced from regions associated with forced labour. We are pleased to report that these questionnaires identified no exposure to forced labour within our supply chain.

3. Which of the following accurately describes the entity's structure?

- ☒ Corporation
- ☐ Partnership
- ☐ Trust
- ☐ Other unincorporated organization

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

- ☐ Producing goods (including manufacturing, extracting, growing and processing)
 - ☐ in Canada
 - ☐ outside Canada
- ☐ Selling goods
 - ☐ in Canada
 - ☐ outside Canada

- ☐ Distributing goods
- ☐ in Canada ☐ outside Canada
- ☐ Importing into Canada goods produced outside Canada
- ☒ Controlling an entity engaged in producing, selling or distributing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

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

Amp is a clean energy developer, owner, and operator committed to accelerating the global energy transition. Our portfolio includes solar photovoltaic (PV), wind, battery storage, and hydrogen projects, supported by our advanced AI-enabled grid flexibility technology platform. We have deployed over \$5 billion in power markets worldwide and constructed or secured contracts for over seven gigawatts (GW) of energy capacity across regions such as Canada, the US, Japan, Australia, Spain, and the UK.

To manage our value chain effectively, Amp uses a strategic approach that seeks to establish master service agreements with our supply chain partners. By curating a select number of suppliers across our global operations, we can build on existing relationships, leverage economies of scale, and maintain close oversight of our supply chain management. This strategy enables us to optimize efficiency and maintain high standards throughout our operations.

Amp is committed to sustainability and ensuring our supply chain management processes adhere to strict operating standards. We also closely monitor our suppliers' business practices to ensure they align with our policies, helping to promote human rights and ethical conduct throughout our global value chain.

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

- ☒ Yes ☐ 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.

- ☒ Embedding responsible business conduct into policies and management systems
- ☒ Identifying and assessing adverse impacts in operations, supply chains and business relationships
- ☒ Ceasing, preventing or mitigating adverse impacts
- ☐ Tracking implementation and results
- ☐ Communicating how impacts are addressed
- ☐ Providing for or cooperating in remediation when appropriate

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)

Amp's policies and due diligence processes regarding forced and child labour are founded on a robust framework centred on human rights and ethical business practices. Our Code of Conduct and Human Rights Policy serve as pillars of our commitment to fostering a workplace that respects the dignity of all individuals. These documents lay out clear guidelines and expectations for our employees and partners, emphasizing our opposition to any form of exploitation, including slavery, human trafficking, forced labour, and child labour.

Amp unequivocally prohibits any involvement in practices encompassing indentured labour, bonded labour, prison labour, or any other coercive working arrangements. We also adamantly reject physical punishment, threats, or any form of physical or mental abuse within our operations or supply chains. Our stance on child labour is equally uncompromising: we adhere to all legal minimum working age requirements to ensure no individuals under 16 are employed within our organization or by our suppliers. To reinforce these principles, we prioritize comprehensive training initiatives. For example, we conduct mandatory annual training for all employees, with specific modules dedicated to topics such as human trafficking and modern slavery.

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

- ☐ Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.
- ☒ Yes, we have started the process of identifying risks, but there are still gaps in our assessments.
- ☐ No, we have not started the process of identifying risks.

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)

- ☐ The sector or industry it operates in
- ☐ The types of products it produces, sells, distributes or imports
- ☐ The locations of its activities, operations or factories
- ☐ The types of products it sources
- ☒ The raw materials or commodities used in its supply chains
- ☒ Tier one (direct) suppliers
- ☐ Tier two suppliers
- ☐ Tier three suppliers
- ☐ Suppliers further down the supply chain than tier three
- ☐ The use of outsourced, contracted or subcontracted labour
- ☐ The use of migrant labour
- ☒ The use of forced labour
- ☐ The use of child labour
- ☐ None of the above
- ☐ Other, please specify

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.

- | | |
|--|--|
| <input type="checkbox"/> Agriculture, forestry, fishing and hunting | <input type="checkbox"/> Management of companies & enterprises |
| <input type="checkbox"/> Mining, quarrying, and oil & gas extraction | <input type="checkbox"/> Administrative and support, waste management and remediation services |
| <input type="checkbox"/> Utilities | |
| <input type="checkbox"/> Construction | <input type="checkbox"/> Educational services |
| <input type="checkbox"/> Manufacturing | <input type="checkbox"/> Health care and social assistance |

- | | |
|--|--|
| <input type="checkbox"/> Wholesale trade | <input type="checkbox"/> Arts, entertainment, and recreation |
| <input type="checkbox"/> Retail trade | <input type="checkbox"/> Accommodation and food services |
| <input type="checkbox"/> Transportation and warehousing | <input type="checkbox"/> Other services (except public administration) |
| <input type="checkbox"/> Information and cultural industries | <input type="checkbox"/> Public administration |
| <input type="checkbox"/> Finance and insurance | <input checked="" type="radio"/> None of the above |
| <input type="checkbox"/> Real estate and rental and leasing | <input type="checkbox"/> Other, please specify: |
| <input type="checkbox"/> Professional, scientific & technical services | |

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)

Across the intricate value chains of solar PV, wind, and battery storage, several components and materials carry potential risks relating to forced or child labour. However, it is essential to note that these risks are not necessarily present within Amp's value chain. Solar PV components, wind turbines, and battery storage systems all involve materials like silicon wafers, rare earth metals, and minerals such as cobalt, lithium, and nickel, sourced from regions where labor practices may not meet international standards, posing inherent risks in their mining and manufacturing processes. Amp manages these risks through a detailed, multifaceted approach. First, we actively avoid sourcing from high-risk areas where forced or child labour is prevalent. This diligence minimizes our exposure to suppliers operating in regions with known labour abuses, reducing the likelihood of inadvertently supporting unethical practices. Second, we have started establishing master service agreements with our suppliers, outlining our expectations regarding labour standards and ethical conduct. These agreements serve as mechanisms to enforce compliance and hold suppliers accountable for maintaining ethical practices throughout their operations. Finally, starting last year in the US, we distributed questionnaires to our suppliers to assess various aspects of their labour practices, including recruitment procedures, working conditions, and adherence to international labour standards.

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

- ☐ Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.
- ☐ Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- ☐ No, we have not taken any remediation measures.
- ☒ 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)

- ☐ Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support
- ☐ Compensation for victims of forced labour or child labour and/or their families
- ☐ Actions to prevent forced labour or child labour and associated harms from reoccurring
- ☐ Grievance mechanisms

- ☐ Formal apologies
- ☐ Other, please specify.

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. As of our latest assessments and monitoring efforts, we have not identified any instances of forced labour or child labour within our operations or supply chains. Therefore, remediation measures have not been necessary.

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?

- ☐ Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.
- ☐ Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- ☐ No, we have not taken any remediation measures.
- ☒ 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. As of our latest assessments and monitoring efforts, we have not identified any instances of forced labour or child labour within our operations or supply chains. Therefore, remediation measures have not been necessary.

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

- ☒ Yes ☐ No

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

- ☒ Yes, the training is mandatory for all employees.
- ☐ Yes, the training is mandatory for employees making contracting or purchasing decisions.
- ☐ Yes, the training is mandatory for some employees.
- ☐ No, the training is voluntary.

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)

Amp's Code of Conduct and Human Rights Policy underscores our commitment to fostering a workplace that respects the rights and dignity of every individual. To ensure compliance, during onboarding, all new employees are trained on these policies, providing the knowledge and tools necessary to uphold our standards.

In 2023, we introduced an online platform offering comprehensive training on all our policies. Starting in 2024, all employees will be required to attend an annual mandatory training session. This training includes modules on the Code of Conduct and Human Rights Policy, focusing on critical topics such as human trafficking and modern slavery. In these modules, participants learn how to identify and address potential abuses and must complete quizzes to demonstrate their understanding. This approach ensures our entire workforce is well-equipped to uphold and promote our company values.

We also recognize the importance of providing our employees with avenues to report violations and express concerns. That is why we have proactively established an anonymous reporting hotline, through which employees can raise any suspicions or evidence of violations without fear of reprisal. Empowering our employees to speak up reinforces our commitment to accountability and transparency, cementing our stance against all forms of exploitation and injustice.

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?

☐ Yes

☒ No

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

- ☐ Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour
- ☐ Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
- ☐ Partnering with an external organization to conduct an independent review or audit of the organization's actions
- ☐ Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators
- ☐ Other, please specify:

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)

We use a range of measures to assess our effectiveness in preventing forced and child labour. For example, we have started integrating questionnaires into our procurement processes and service agreements to ensure our suppliers meet strict and ethical labour standards. Additionally, we maintain continuous communication with suppliers to monitor compliance. Presently, we are in communication with suppliers to obtain third-party certifications to demonstrate compliance with international laws on forced labor and child labor.

Signed Attestation

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.

A handwritten signature in blue ink, appearing to read "D. Rogers", is written over a horizontal line.

I have the authority to bind Amp Solar Group Inc.

Full name : **David Rogers**

Title: **President and Chief Executive Officer**

Date: **24th of may 2024**