



REPORT PURSUANT TO THE
**Act to enact the
Fighting Against
Forced Labour and
Child Labour in
Supply Chains**



MAY 2024

ABOUT THIS REPORT

This is a joint report (the “Report”) made pursuant to subsection 11(2) of the *Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (the “Act”) and prepared on behalf of and by EDF Renewables Canada Inc. and its applicable subsidiaries (see [Appendix A](#)) for the period covering January 1 to December 31, 2023. EDF Renewables Canada Inc. is indirectly and wholly owned by EDF S.A, a French société anonyme (“EDF”) with activities around the world.

Note that all information, descriptions and policies contained herein are applicable to EDF Renewables Canada Inc. and its applicable subsidiaries (see [Appendix A](#)) as a whole (hereinafter referred to as “EDFR”). Further, the terms “we,” “our,” “us,” “company,” and “EDFR” as used in this document refer collectively to EDF Renewables Canada Inc. and its applicable subsidiaries (see [Appendix A](#)), unless the context suggests otherwise. These terms are used for convenience purposes and do not intend to provide an exact description of any distinct legal entity within EDFR.

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Our Structure and Activities

EDF Renewables Canada Inc. is a company incorporated under the *Canada Business Corporations Act*. EDF Renewables Canada Inc. is the parent company of the subsidiaries covered under this Report.

Canada depends on clean energy to live, work, develop and grow. Our customers depend on us to produce affordable clean energy, and we depend on our people to help us take on new challenges and fulfil our ambitions. Being a sustainable and responsible energy business is an integral part of EDF’s 2030 strategic business vision - to be an efficient, responsible electricity company and a champion of clean energy growth.

For over fifteen years, EDFR has demonstrated this vision by developing, financing, constructing, and operating clean energy projects across Canada. Over this time, EDFR has grown a portfolio of onshore wind and solar projects of over 2 GW - over 1.2 GW MW of which are projects owned in partnerships with local Indigenous

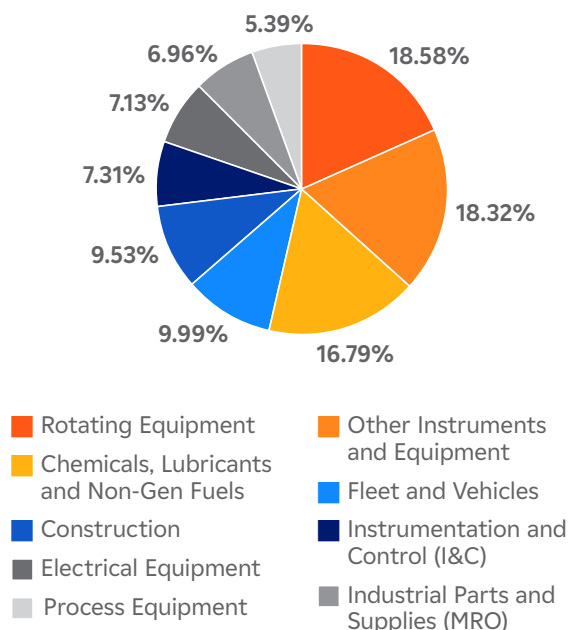
communities and/or municipal partners. EDFR has emerged as a market pioneer and leader in indigenous equity partnerships, demonstrating our commitment to fostering inclusive and mutually beneficial relationships for communities that host our clean energy projects.

EDFR also leverages its technical, operational, and commercial expertise to provide operation and maintenance services to optimize the performance of its own, and third-party generating projects. Our experienced and passionate team of clean energy professionals are committed to finding ways to build high-quality power projects by establishing long-term business relationships with people who share our mission of delivering renewable solutions. As Canada’s challenge of electrifying its diverse and growing economy continues to evolve, EDFR is committed to continue to invest in Canada’s electric grid and support Canada’s net zero goals.

Our Supply Chain

In 2023, the EDFR supply chains consisted of North American (Canada and U.S.) and European suppliers that provided equipment, goods and services to EDFR. The equipment, goods and services that we purchased in 2023 were used to operate wind and solar assets as part of EDFR’s operation and maintenance services.

The following graphic depicts the primary spending categories of expenditures by EDFR in 2023.



At EDFR, our suppliers play an essential role in helping us uphold our commitment to creating a sustainable energy economy through corporate social responsibility. In that regard, we prioritize operational excellence and competitiveness when selecting our suppliers. We have implemented a diligent approach to supply chain risk monitoring that proportionately aligns with our purchasing activities, notably by incorporating additional steps in our procurement process. We seek suppliers who share our mission, core values and, among other things, adhere to EDF's [Ethics and Compliance Code of Conduct](#). For further information on the steps taken to prevent and reduce the risks of forced labour and child labour, as well as our due diligence process, please refer to the relevant sections of this Report.

STEPS TAKEN TO PREVENT AND REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR

EDFR's mission goes beyond the production of clean, renewable energy for today's world. Our commitment lies in providing future generations with the means to power their lives in the most economically, environmentally, and socially responsible ways possible. Guided by our core values of safety, good sense, accountability, transparency, teamwork, respect, and passion, we strive to make a positive impact on both the economic and social fronts. As an industry leader, an exceptional employer, and a responsible corporate citizen, we strive to operate in a safe, ethical, inclusive, transparent, and socially and environmentally responsible manner.

To uphold these values and mitigate the risks of forced labour and child labour, EDFR has implemented a comprehensive range of policies and practices within our operations and in our supply chains. These processes include: confirming with our suppliers that they have in place formal policies on forced labour and child labour; and engaging with them to ensure that they meet minimum standards, including the ten principles of the [UN Global Compact](#) that address forced labour and child labour, as outlined in the due diligence processes section of this Report.

We actively encourage our supply chain to drive positive social impact and environmental change. To reinforce our stance against forced labour and child labour, we have been incorporating anti-forced labour and anti-child

labour clauses into our precedent contracts. As part of our ongoing efforts, we are progressively introducing these clauses to ongoing negotiations with suppliers. By 2024, we aim for all our new contracts with suppliers to include these clauses.

POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

Our Policies and Processes Implemented

At EDFR, we are committed to implementing due diligence practices that align with the risks associated with our activities, supply chains, and business relationships, in order to foster and reinforce responsible conduct by our suppliers.

To ensure all those in EDFR's supply chain comply with our values, we have established a diligent approach to ensuring compliance within our supply chain. Suppliers are requested to adhere to a set of minimum standards that encompass various aspects of responsible business conduct. These standards include the ten principles of the [UN Global Compact](#), a strategic policy initiative developed by the United Nations for businesses committed to aligning their operations and strategies with principles in the areas of human rights, labour, environment, and anti-corruption. EDF S.A., the ultimate parent of EDFR, is a signatory to the [UN Global Compact](#) since 2001. EDFR actively promotes awareness of these [UN Global Compact](#) principles among its suppliers. Our procurement team plays a crucial role in supporting suppliers to understand and meet these expectations.

In addition to the [UN Global Compact](#), we request to our suppliers that they complete a risk-based self-assessment covering areas such as corporate social responsibility, health and safety, environment, quality, supply chain, finance, and risk management insurance. This assessment helps us evaluate the potential risks related to forced labour and child labour within our supply chain. Suppliers are asked to confirm whether they have in place formal policies addressing these issues. By conducting these assessments, we gain valuable insights into the practices and policies of our suppliers, allowing us to identify areas for improvement and provide necessary support and guidance.

To ensure that our commitment to responsible business conduct extends to suppliers, contractors, and subcontractors engaged in work, materials, goods,

and services for EDFR, we require our suppliers and employees involved in the procurement process to operate in a manner that aligns with our sustainability and ethics requirements, as outlined in the [EDFR's Sustainability & Ethics Manual](#). Our [EDFR's Sustainability & Ethics Manual](#) states that our suppliers shall maintain procedures, processes and controls designed to remove any form of child labour and any form of commercial exploitation, including indentured, forced, compulsory, bonded, prison or trafficked labour from their business operations and supply chain. Suppliers are further required to pay wages that comply with the minimum wage legislation in the countries in which they operate or appropriately benchmarked wages where no legal minimum wage exists. More generally, we require that our suppliers operate in full compliance with all applicable labour laws. All our employees in the procurement process are supporting our suppliers in understanding these expectations. This includes demonstrating a clear commitment to sustainable, responsible, and ethical business practices. By setting these expectations and fostering open communication, we strive to create a culture of continuous improvement and accountability throughout our supply chain.

Our Suppliers

At EDFR, we contract with suppliers to ensure that we have the goods and services needed to generate and supply energy to our customers. Our supply chain due diligence processes include defined procedures and monitored onboarding and qualification of new suppliers. These processes help to gather specific data and information points on our suppliers, allowing us to identify any potential risks and areas of focus within our supply chain.

In addition to our general supplier qualification processes, key strategic suppliers undergo additional qualification processes that assess, among other things, forced labour and child labour-related risks, activities, and practices. However, it is important to note that in 2023, EDFR did not have any key strategic suppliers engaged in our activities.

Our Employees

All employees involved in the procurement process are expected to support suppliers in understanding our expectations throughout the procurement process. All employees are required to act in accordance with

[EDF's Ethics and Compliance Code of Conduct](#), which requires and reminds our people that we are a company that acts honestly and ethically. Our employees receive mandatory training on [EDF's Ethics and Compliance Code of Conduct](#), as detailed in the training provided to employees on forced labour and child labour section of this Report.

EDFR is committed to fair employment practices and to ensuring legal and regulatory compliance. This commitment, in addition to the policies and procedures described above, collectively demonstrates our on-going commitment to the elimination of any risk of forced labour and child labour practices.

RISK OF FORCED LABOUR OR CHILD LABOUR IN OUR SUPPLY CHAINS AND STEPS TAKEN TO ASSESS AND MANAGE THE RISK

While EDFR has initiated a process of identifying risks of forced labour or child labour being used in our activities and supply chains, our assessment in 2023 did not reveal any known risks or known cases of forced labour or child labour among our active suppliers within our supply chains. It should be noted that we exclusively dealt with suppliers located in Canada, the U.S., and Europe, and that we used reasonable due diligence processes proportionate to our risk of exposure to forced labour and child labour, as well as our purchases in 2023, to make this assessment.

However, we recognize the importance of remaining vigilant in this regard and implementing any measures reasonably required to properly assess any risks of forced labour and child labour used in our supply chains for any future activities that could present a higher risk of forced labour or child labour being used. We are committed to ensuring ethical sourcing practices throughout our supply chains and will continue to monitor and evaluate potential risks.

Measures Taken to Remediate Forced Labour or Child Labour

Based on our assessment, we are not aware of any known incidents or significant risks of forced labour or child labour being used among our active suppliers within our supply chains. As such, we do not consider the issue of remediation (including the loss of income to vulnerable families resulting from measures taken to

eliminate the use of forced labour or child labour within our supply chains) to be applicable to our activities in 2023.

Training Provided to Employees on Forced Labour and Child Labour

EDFR conducts its business with ethics and integrity, adhering to international conventions, local laws and regulations, as well as its own rules and commitments. In order to ensure the long-term sustainability of our business and uphold our values, legislation, and ethical standards, all employees are required to complete mandatory training on EDF's Ethics and Compliance Code of Conduct. This training aims to raise awareness among our employees about our expectations regarding ethical behaviour and our core business values. Through this training, employees become familiar with the available supporting documents that provide guidance on how to work in an honest and ethical manner. It also equips them with the necessary tools and confidence to report any suspected unethical conduct within the organization. Our EDF's Ethics and Compliance Code of Conduct emphasizes the importance of acting honestly and ethically, and employees are reminded to promptly report any concerns related to potentially illegal activities (including forced labour or child labour), unethical behaviour, or actions that may harm the business, using EDF's confidential reporting hotline.

Employees involved in the procurement process receive additional information on prevention of forced labour and child labour as contracts with suppliers are conditioned upon compliance with our ethical standards and the law.

ASSESSING EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR ARE NOT BEING USED IN OUR BUSINESS AND SUPPLY CHAINS

At EDFR, we have implemented initiatives to assess the effectiveness of our efforts in preventing the use of forced labour and child labour. Moving forward, we remain committed to enhancing these initiatives as reasonably required.

As outlined above, we request to our suppliers that they complete a risk-based self-assessment, where they are asked to confirm whether they have in place

formal policies addressing forced labour and child labour. This assessment helps to gather specific data and information points on our suppliers, allowing us to identify any potential risks and areas of focus within our supply chain for forced labour and child labour. We also have additional qualification processes to evaluate our key strategic suppliers and assess, among other things, forced labour and child labour-related risks, activities and practices. However, since we did not have any key strategic suppliers engaged in our activities in 2023, we have not used these processes in 2023.

EDF has implemented a confidential reporting hotline for all employees to track and address any concerns related to potentially illegal activities, such as forced labour or child labour, unethical behaviour, or actions that may harm the business or the communities in which we do business. This hotline ensures that employees, independent contractors, suppliers, or others with whom we do business have a secure and confidential channel to report any such issues. The reports received through the hotline are thoroughly investigated, and appropriate actions are taken to address and resolve the concerns raised. The confidentiality of the reporting process is strictly maintained to protect the identity of the individuals reporting the concerns.

APPROVAL AND 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.

Signed:



TRISTAN GRIMBERT, PRESIDENT AND CHIEF EXECUTIVE OFFICER, EDF RENEWABLES CANADA INC.

I have the authority to bind EDF Renewables Canada Inc. and its applicable subsidiaries.

APPENDIX A

Subsidiaries of EDF Renewables Canada Inc. Covered Under the Report Dated May 2024

- EDF Renewables Services Inc.
- EEN CA Rivière du Moulin L.P., represented by its general partner, EEN GP Rivière du Moulin Inc.
- EEN CA Blackspring Ridge I Wind Project L.P., represented by its general partner, EEN GP Blackspring Ridge I Wind Project Inc.
- EEN CA Lac Alfred L.P., represented by its general partner, EEN GP Lac Alfred Inc.