



Fighting Against Forced Labour and Child Labour in Supply Chains Act

Annual Report 2023
Halifax Port Authority



Executive Summary

The purpose of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* as it relates to government institutions is to contribute to the international fight against forced labour and child labour by enacting reporting obligations on producing, purchasing, or distributing goods in Canada or elsewhere.

The Halifax Port Authority (HPA) is taking steps to taking steps to reduce and eliminate instances of modern slavery in its supply chains. This first report outlines measures taken to increase awareness and transparency to prevent and reduce the risk that forced labour or child labour was used at any step in the production of goods produced, purchased, or distributed by HPA for the financial year ending December 31, 2023.

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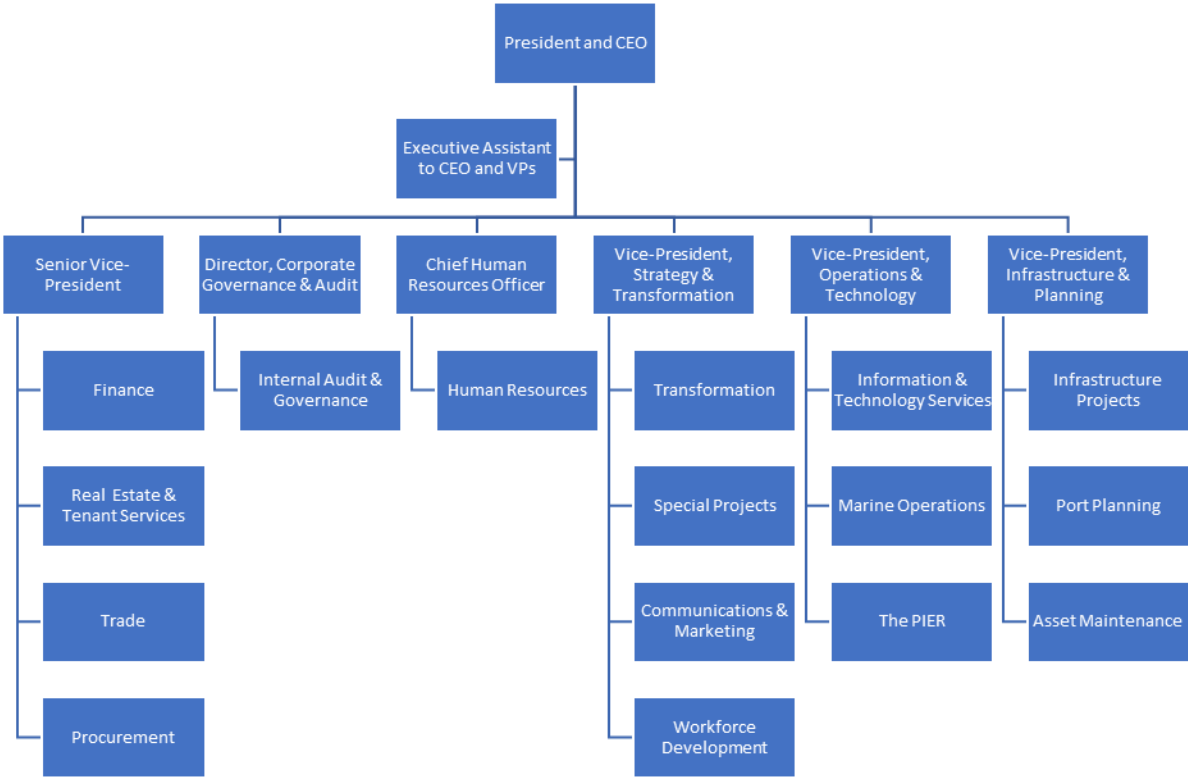
HPA Structure, Activities, and Supply Chains

The Halifax Port Authority (HPA) was created on May 1, 1999 by letters patent issued by the Minister of Transport pursuant to Section 8 of the *Canada Marine Act*. HPA is a Canadian Port Authority operating as a federal agent of the Crown, in accordance with the *Canada Marine Act*. HPA is governed by a Board of Governors, and reports to Parliament through the Minister of Transport.

HPA is responsible for administering Halifax Harbour and has a mandate to develop, market and manage 265 acres of federally owned marine industrial land in the harbour and all adjacent federal waters for regional and national economic benefit. HPA is committed to driving economic growth through the development and promotion of the three lines of business which are cargo, cruise and real estate.

HPA employs approximately 100 people from its location in Halifax, Nova Scotia.

Organizational Chart



Current as of December 31, 2023

Parts of HPA Business and Supply Chains that Carry a Risk and Mitigation Measures

The Halifax Port Authority does not produce or distribute goods. Materials that are purchased are related to the construction, maintenance, development and administration of industrial marine assets and lands under administration.

- Building and construction
- Technology equipment and services
- Office supplies
- Operational supplies and services

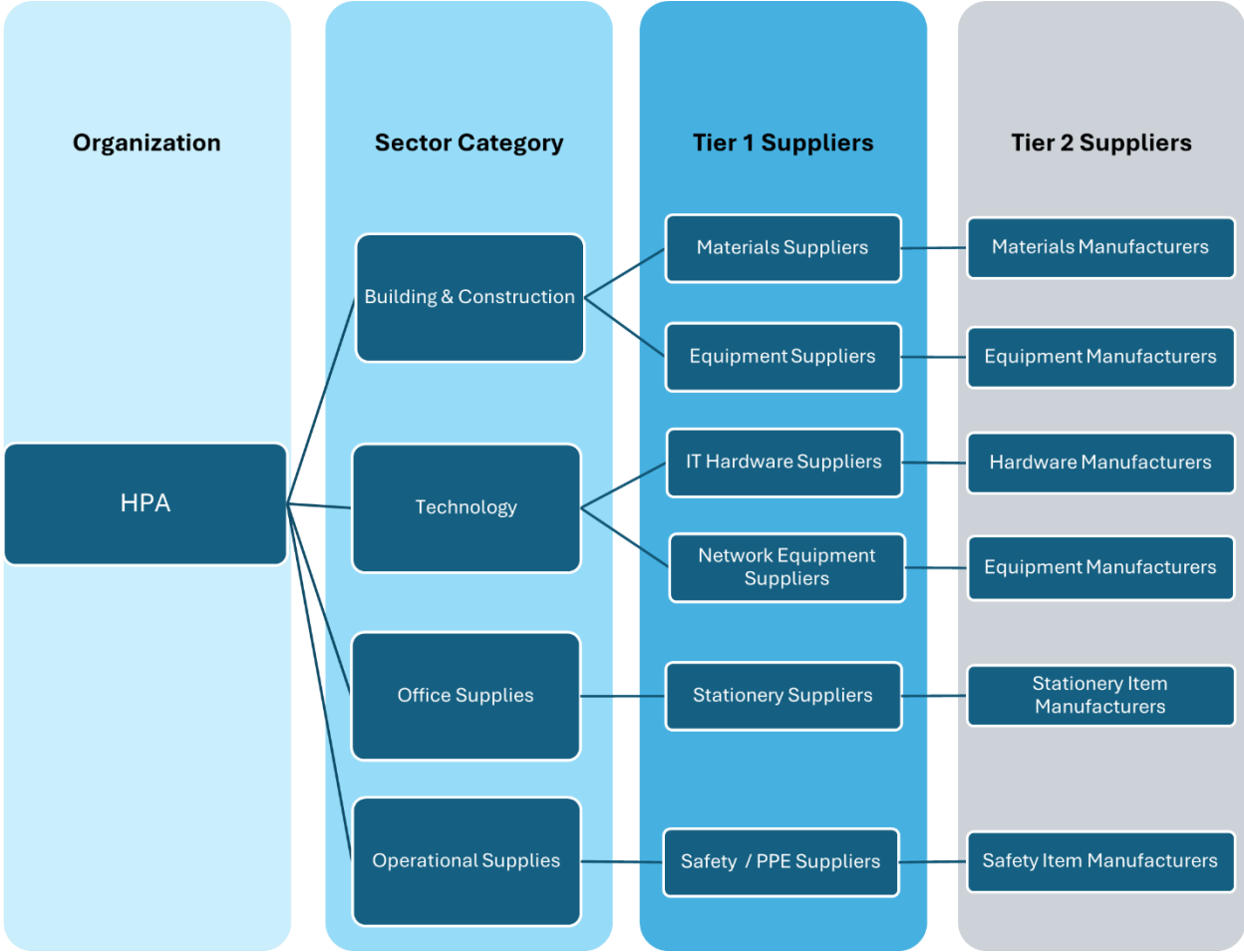
The majority of Tier 1 suppliers providing goods for HPA are Canadian companies which carry a lower risk of child labour and forced labour being used in the production of goods and materials. Generally, the higher risk for child labour and forced labour is found within Tier 2 suppliers.

Actions Taken to Reduce Risk Associated with Forced Labour or Child Labour

HPA took the following steps to identify and reduce the risk of forced labour or child labour in its business and supply chains:

- Developed and approved a Procurement Policy and supporting framework which integrates respect for human rights, the environment, and social and responsible corporate behaviour into procurements by including measures to identify, mitigate and disclose risk that human trafficking, forced or child labour, or any other unethical business practice is occurring in HPA supply chains.
- Supply chain mapping of Tier 1 suppliers as part of the development and implementation of the Procurement Policy.
- Formed a cross departmental internal working group with representatives from Corporate Governance and Audit, Internal Audit, Procurement, and Strategy and Transformation to review the Act, assess HPA's policies and procedures, and take steps to increase awareness of the risks associated with forced labour and child labour.

Supply Chain Map

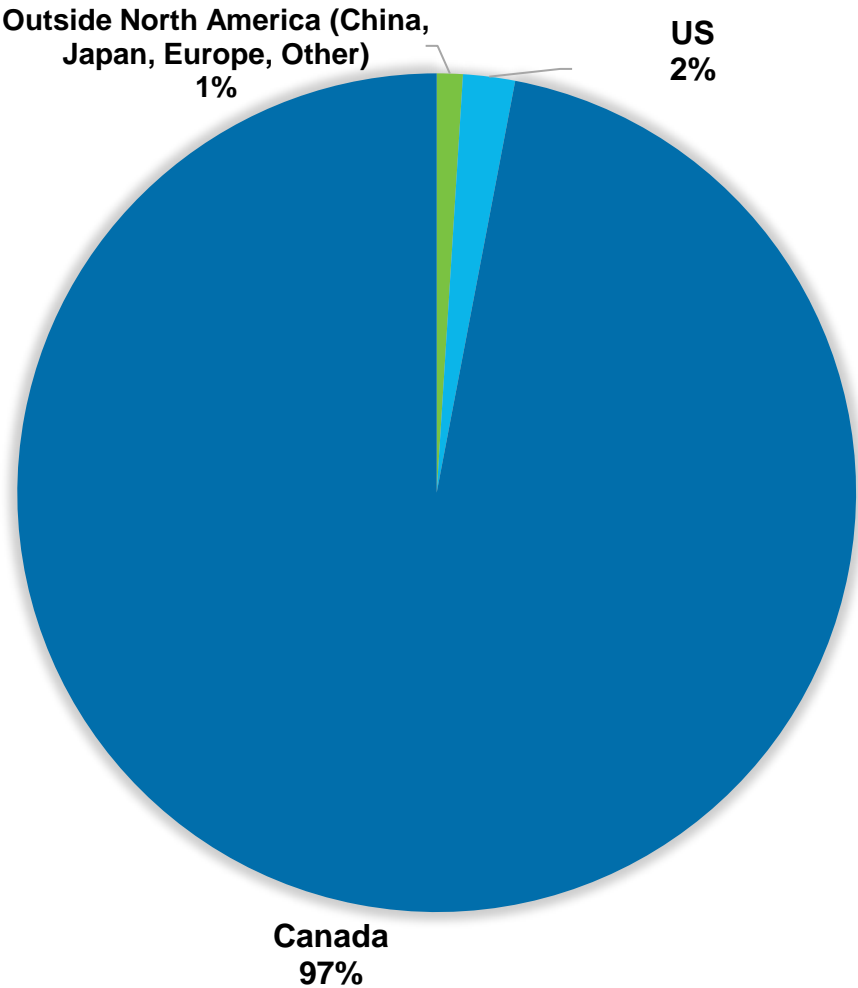


HPA's Approach to Procurement

HPA sources its suppliers through both competitive and non-competitive procurement processes and in accordance with its Procurement Policy. HPA is committed to supporting enterprises whose core objectives include advancing equity, diversity, inclusivity, socio-economic interests and/or building healthy communities. This includes a commitment to supporting Nova Scotia businesses as much as possible.

As shown by the chart below, 97% of HPA's supply chain resides within Canada, with over 76% of its Canadian suppliers located in Nova Scotia.

Tier 1 Suppliers – By Country of Origin



Current as of December 31, 2023

Policies and Due Diligence Processes

HPA has corporate and management level policies in place to provide all levels of the organization with transparent guidance on how to achieve corporate objectives and reduce risk. The content below provides an overview of the policies at HPA related to reducing the risk of forced labour and child labour being used in supply chains.

Procurement Policy

HPA's Procurement Policy integrates respect for human rights, the environment, and social and responsible corporate behaviour into procurements by including measures to identify, mitigate and disclose risk that human trafficking, forced or child labour, or any other unethical business practice is occurring in HPA supply chains.

It includes a risk-based system of internal controls that are maintained, monitored, and reviewed to provide reasonable assurance that procurement transactions are carried out in accordance with the framework, and applicable laws, regulations, and policies. It also provides guidance on contract management with clearly defined roles, responsibilities, and accountabilities, and clearly defines procurement exceptions.

Conflict of Interest/Code of Conduct and Post-Employment Policy

The ethical conduct of business is critical to the success of the HPA. Ethical business conduct at the HPA goes beyond compliance with the law; it means a commitment to integrity in all business operations. The Halifax Port Authority Conflict of Interest/Code of Conduct and Post-Employment Policy is reviewed and signed by all employees at the start of their employment.

Whistleblower Policy

HPA is committed to ensuring it carries out its mandate and responsibilities in accordance with the highest standards of professional ethics, and in compliance with the law. HPA has adopted this Whistleblower Policy to help maintain these standards and promote a culture of accountability.

It is the responsibility of department managers and executive members to take all appropriate steps to prevent improper conduct in their respective areas of responsibilities. The HPA expects any employee, executive member, or board member who has knowledge of or believes that they have witnessed an act of improper conduct to report the incident immediately.

HPA will take all necessary steps to protect the identity of the whistleblower unless the whistleblower consents to being identified, the HPA is legally required to identify the whistleblower, or it is necessary for the HPA to effectively investigate or respond to the complaint or matters disclosed in the investigation.

Actions Taken to Remediate Forced Labour or Child Labour

HPA has not identified any forced labour or child labour in its supply chains. No action was taken to remediate forced labour or child labour in 2023.

Actions Taken to Remediate the Loss of Income for Those Affected by Mitigation Measures

HPA has not identified any forced labour or child labour in its supply chains. No actions taken in 2023 to remediate the loss of income for those affected by mitigation measures.

Training Provided to Employees

Members of the cross departmental working group attended several training sessions in the development of this report. This includes industry association calls and consultation with other Canadian Port Authorities. A company-wide training program to identify and mitigate risks associated with forced labour and child labour in supply chains for all management and employees is being developed.

How HPA Assesses its Effectiveness

Our procurement processes include a risk-based system of internal controls that are maintained, monitored, and reviewed to provide reasonable assurance that procurement transactions are carried out in accordance with the framework, and applicable laws, regulations, and policies. From this, our procurement department is developing an annual compliance analysis.