

**Report under the  
*Fighting Against  
Forced Labour and  
Child Labour in  
Supply Chains Act***

**By Henvey Inlet Wind LP**

**May 2024**



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## 1 INTRODUCTION

This report is issued by Henvey Inlet Wind GP Inc., in its capacity as general partner of Henvey Inlet Wind LP (“Henvey Inlet Wind”), pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and covers the reporting period from January 1, 2023, to December 31, 2023.

Henvey Inlet Wind is a 300 MW wind power facility on Henvey Inlet First Nation Reserve No. 2 lands in Ontario, Canada. The wind facility generates economic benefits for Henvey Inlet First Nation, while valuing corporate responsibility, human rights, and the safety and well-being of workers on-site and across its supply chain.

The report outlines due diligence and governance processes and measures taken to mitigate the risks of modern slavery across the supply chain as applicable to Henvey Inlet Wind. Per the Act, the report shall describe the entity’s:

- *Structure, activities, and supply chains,*
- *Policies and due diligence processes in relation to forced labour and child labour,*
- *The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk,*
- *Any measures taken to remediate any forced labour or child labour,*
- *Any measures 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,*
- *The training provided to employees on forced labour and child labour, and,*
- *How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.*

### 1.1 Entity Structure

Henvey Inlet Wind LP is a limited partnership formed in Ontario and jointly owned by an indirect subsidiary of Pattern Energy Group LP (“Pattern”) and Nigig Power Corporation, a wholly owned subsidiary of Henvey Inlet First Nation (“HIFN”). HIFN is an Anishinabek community in Robinson Huron Treaty territory.

### 1.2 Activities

Henvey Inlet Wind generates clean, renewable electricity that is sold to the Independent Electricity System Operator. Pattern Operators Canada ULC, an affiliate of Pattern, operates and manages the maintenance of Henvey Inlet Wind and performs certain other services pertaining to the facility. There are Pattern employees on-site to manage facility operations.

### 1.3 Supply Chains

Henvey Inlet Wind and Vestas Canadian Wind Technology, Inc. executed a service agreement whereby Vestas Canadian Wind Technology maintains the wind turbines, employs turbine technicians to perform preventive and corrective maintenance activities, and is the primary supplier of major electrical equipment and parts used to maintain the site.

Henvey Inlet Wind procures various goods and services for the site. Examples of goods procured include fuel for site trucks and backup generators, spare parts, equipment rentals, and office supplies. Examples of services include environmental, consulting, insurance, equipment maintenance, cleaning, and waste removal.

## **2 POLICIES AND DUE DILIGENCE**

### **2.1 Policies**

Henvey Inlet Wind is committed to respecting fundamental human rights and demands its suppliers comply with all applicable laws, including but not limited to forced or compulsory labour and minimum age of labour. Suppliers must abide by applicable law through standard terms and conditions and contracts.

Pattern incorporates internationally recognized human rights standards and industry best practices into its policies and practices, which apply to its employees, affiliates, and subsidiaries. Employees must abide by Pattern's Code of Business Conduct and Ethics and Anti-Corruption Policy. Pattern tracks adherence through questionnaires and a controls certification process.

In 2023, Pattern published its [Human Rights Statement](#) to describe how the company and its affiliates and subsidiaries support human rights and incorporate them into their practices, procedures, and systems. The statement summarizes Pattern's human rights management approach, including due diligence, stakeholder engagement and communications, governance, and grievance mechanisms.

Pattern respects workers' rights and has policies and systems to support its obligations and commitments to its workforce. Pattern prohibits modern slavery or human trafficking in its business activities, including any part of its supply chain. Pattern forbids involuntary or forced labour, including labour to be performed by children, bonded labour, indentured labour, and prison labour. Its background check process verifies the eligibility of all workers.

In 2023, Pattern also published a [Supplier Code of Conduct](#) that establishes the minimum standards its suppliers should meet related to ethical business practices and explicitly prohibits forced labour. Pattern incorporated the Supplier Code of Conduct into its standard Terms and Conditions that apply to all manufacturers, distributors, vendors, contractors, and other suppliers who provide goods and services to Pattern and its subsidiaries, including Henvey Inlet Wind.

Suppliers shall not support or engage in slavery or human trafficking in any part of their supply chain. All work shall be voluntary, and employees shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given. A supplier shall not, and shall ensure that its Partners do not, support or engage in, or require any compelled, involuntary, or forced labour, labour to be performed by children, bonded labour, indentured labour, and prison labour. Compelled, involuntary, or forced labour includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labour or services.

## **2.2 Due Diligence Processes**

Pattern and Henvey Inlet Wind perform diligence on suppliers, including using Refinitiv's World Check system. Suppliers performing work deemed to be medium to high risk from a safety standpoint are further vetted through a subscription to ISNetwork. The ESG Assure feature of ISNetwork captures suppliers' responses to an ESG survey, which covers human rights topics.

## **3 RISK ASSESSMENT AND MANAGEMENT**

### **3.1 Risk of Forced or Child Labour**

Henvey Inlet Wind is still in the risk evaluation process and believes forced or child labour in its supply chain is low risk.

### **3.2 Steps Taken to Assess and Manage Risk**

Pattern examines its governance policies annually to determine if updates are needed based on risk assessments and best practices. Its Enterprise Risk Management program identifies and mitigates risks across the enterprise. Risks are categorized, tracked, and analyzed.

## **4 REMEDIATION MEASURES TAKEN**

No instances of forced or child labour have been identified, and therefore, no remediation measures have been taken.

## **5 MEASURES TO REMEDY IMPACT OF REMEDIATION**

No instances of forced or child labour have been identified. Therefore, no remediation measures have been taken and no measures to remediate the impact from such measures are necessary.

## **6 TRAINING PROVIDED TO EMPLOYEES**

Pattern requires its employees to complete training to review the Code of Business Conduct and Ethics and provisions on global compliance, anti-corruption, workplace harassment, and discrimination prevention. The training does not specifically address child or forced labour at this time. Pattern is creating employee training on its Supplier Code of Conduct and its formal grievance mechanism that was expanded to external stakeholders in 2023.

## **7 EFFECTIVENESS ASSESSMENT**

### **7.1 Human Rights Frameworks and Standards**

In 2023, Pattern hired an independent third-party to perform a Human Rights assessment to compare Pattern's corporate policies and practices to four human rights standards and frameworks and concluded Pattern to be in conformance with the standards evaluated. Frameworks and standards evaluated:

- Equator Principles Guidance Note on Human Rights Assessments
- International Finance Corporation Performance Standards
- United Nations Guiding Principles on Business and Human Rights
- Business and Human Rights Resource Center's Renewable Energy and Human Rights Benchmark

## 7.2 Reporting

Henvey Inlet Wind values honest, open communications, and aim to ensure stakeholders, including its workforce and suppliers, feel comfortable and empowered to report instances where they believe violations of policies or standards have occurred directly to their managers or to Henvey Inlet Wind representatives.

In 2023, Pattern expanded its EthicsPoint Hotline to external parties, which includes the stakeholders of Henvey Inlet Wind. The EthicsPoint Hotline contact information is in Pattern's [Human Rights Statement](#) under the Reporting Grievances section. In situations when someone prefers to place a confidential, anonymous report, they are encouraged to use the hotline hosted by EthicsPoint, a third-party vendor. The information provided will be sent to Pattern by EthicsPoint, ensuring confidentiality and anonymity.

Suppliers shall not retaliate or take disciplinary action against any worker who has, in good faith, reported violations or questionable behavior. Workers reporting violations or questionable behavior in good faith must have their confidentiality and anonymity maintained, unless prohibited by law.

## 7.3 Continuous Improvement

To monitor and continually improve its human rights and supplier due diligence program, Henvey Inlet Wind will conduct periodic benchmarking with industry peers and stakeholder engagement. Its policies and procedures are reviewed and updated in accordance with industry best practices.

## 8 APPROVAL

This report has been approved by the board of directors for Henvey Inlet Wind GP Inc., the general partner for Henvey Inlet Wind LP.

## 9 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 Henvey Inlet Wind LP.*

*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.*

*I have the authority to bind Henvey Inlet Wind GP Inc., in its capacity as general partner for and on behalf of Henvey Inlet Wind LP.*



Daniel Elkort, Authorized Signatory  
May 24, 2024