

Mitsubishi Power Canada, Ltd

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT REPORT

Mitsubishi Power Canada Ltd. makes this report for the financial year ending March 31, 2024, pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c. 9, assented to 2023-05-11 (the “Act”).

This is an Initial Report.

Reporting Entity Identifying Information:

- Corporation Number 923440-3
- Power Generation Equipment Manufacturing and Servicing
- Registered Address: 600, 105-21st Street East, Saskatoon, SK S7K 5Z4

Certain MHI Group companies may make similar attestations each year pursuant to section 54 of the *Modern Slavery Act 2015* (England).

Mitsubishi Power Canada, Ltd is a member of the Mitsubishi Heavy Industries, Ltd (Japan) group of companies, with such group of companies designated herein as the “MHI Group”. Mitsubishi Power Canada Ltd. has adopted the MHI Group policies related to ethics and social governance principles.

Steps Taken to Prevent and Reduce Risks of Forced Labour and Child Labour

The MHI Group is committed to taking effective steps to assess, prevent, and mitigate the risk of modern slavery, forced labour and child labour in our operations and supply chain. We aim to be transparent about these steps and expect the same of our suppliers and contractors.

Structure, Activities and Supply Chains

Policies and Due Diligence Processes

Policies

The MHI Group is committed to taking effective steps to assess, prevent, and mitigate the risk of modern slavery, forced labour and child labour in our operations and supply chain. We aim to be transparent about these steps and expect the same of our suppliers and contractors.

Entities in the MHI Group must adopt the *MHI Group Global Code of Conduct* (the “Code”). The Code prohibits the use of compulsory or forced labour and child labour and requires us to maintain a framework of fair and just remuneration, fair working hours, and benefits.

The Code is available at: <https://www.mhi.com/company/aboutmhi/policy/conduct-html>

In addition to the Code, MHI also has adopted the MHI Group Human Rights Policy which states, in part, that the company recognizes that the human rights of all those affected by the MHI Group’s business activities must be respected. The policy is based upon the United Nations Guiding Principles on Business and Human Rights. MHI is a signatory to the United Nations Global Compact (the “GC 10”). The MHI Group has affirmed its support and respect of core labor standards such as Prohibition of Child Labor, Prohibition of Forced Labor, Elimination of Discrimination, and Freedom of Association and Collective Bargaining Rights.

The MHI Group Human Rights Policy is available at:

https://www.mhi.com/sustainability/social/pdf/mhigroup_human_rights_policy.pdf

We continue to enhance the ways we work with our suppliers and our contractors to ensure we apply common standards and philosophies to help eradicate modern slavery, forced labour and child labour. Entities in the MHI Group must adhere to the MHI Group Procurement Policy and its core values of Openness, Fairness, Partnership and Compliance. The MHI Group Procurement Policy also requires the exclusion of anti-social forces.

The MHI Group Procurement Policy is available at: <https://www.mhi.com/company/procurement>.

In addition to the aforementioned policies, the MHI Groups has put in place Global Policies and Procedures, including global policies and procedures related to procurement activities. There are also Supply Chain CSR (Corporate Social Responsibility) Promotion Guidelines available regarding our business partners at: <https://www.mhi.com/company/procurement/csr>.

As part of these aforementioned policies and procedures we execute self-assessments on compliance within our supply chain and procurement processes based on a company standard checklist. This process assists us to develop a better understanding of the actors in our supply chain.

We ensure consistent communication of the Group Global Code of Conduct throughout our business and management at all levels, including:

- direct and interactive communication to new employees on induction;
- e-learning/training for all employees at in the MHI Group to explain their role and responsibility in complying with our Global Code of Conduct, including discussing issues at regular General Manager meetings;
- through publication of the Code of Conduct on our internal and external websites; and
- the distribution of the Code of Conduct to all our staff who are required annually to declare that they have read and understood the same.

DUE DILIGENCE PROCESS

In order to identify and respond to modern slavery, forced labour and child labour, we adopt a risk assessment-based approach and have put in place the following processes:

- We identify, assess and continually monitor risk areas in our business and supply chains.
- We only work with reputable vendors selected and assessed by supply chain.
- We analyze our supply chain in order to better understand and assess the nature and level of potential risks within our supply chains. We use the outcomes of this work to take more targeted action in respect of any significant risks identified.
- We ensure that our employees know how to identify violations of the MHI Group Code of Conduct and Global Policies and Procedures in general. Further details are provided below under the heading "Training".
- We continue to share information across the MHI Group of any updates to governmental requirements/guidance related to modern slavery, forced and child labour.
- We protect whistle blowers, including on issues related to modern slavery, force labour and child labour. This protection is communicated to all our employees through our employee handbook and through our website as part of our compliance statement. We use a system with Ethics Point (known as our whistleblowing hotline), an external service provider which allows the submission of issues and concerns completely anonymously. The implementation and go-live of this system have been communicated to all our employees.

- Employees are also encouraged to raise any concerns or suspicions they may have regarding human rights, modern slavery, force labour and child labour abuses at the earliest opportunity to the Compliance Manager and General Counsel.

We ensure that any employee with a grievance, including in circumstances which might relate to modern slavery, forced labour and child labour is listened to and treated fairly, according to our workplace grievance mechanism. To ensure transparency and accessibility, this grievance mechanism is integrated into our Compliance function which adheres to processes to investigate and ensure whistleblower protections are offered to the employee raising a grievance.

Forced Labour and Child Labour Risks

Several functions in our company support our measures to assess and manage modern slavery and human trafficking risks. These include amongst others:

- **Corporate Planning**, through their review of budgets and governance activities.
- **Finance, Accounting and Tax**, through their review of financial transactions, budgets and tax governance.
- **Corporate Communications**, through their interactions with internal and external stakeholders support the identification of potential instances of non-compliance.
- **Purchasing**, through the assessment of vendors and self-assessment of procurement activities.
- **Legal**, through interaction with staff and management and with external law firms and legal advisors, ensure that we remain at the forefront of changes in legislation and corporate requirements. In addition to the above steps, we have also undertaken (in conjunction with our external lawyers), an analysis of our existing obligations and trends in relation to existing and proposed business and human rights legislative mechanisms.
- **Human Resources**, through development of the relevant policies that cover our staff's interaction with internal and external parties (e.g. the Code of Conduct and others).

Employees are encouraged to discuss concerns with their supervisors without fear of repercussions. This structure allows us to identify issues quickly when they would occur.

Remediation Measures and Assessing Effectiveness

MHI Group has created a Sustainability Databook which includes information measured and tracked as outlines in the *Sustainability Databook*, which is available at:

<https://www.mhi.com/sustainability/library/pdf/sustainabilitydatabook2023.pdf>

The *MHI Sustainability Databook 2023* details the efforts that the MHI Group has implemented in relationship to Human Rights. The Databook includes a roadmap of the way in which the MHI Group has investigated human rights violation risks and will work to reduce these risk factors in the future, including the use of questionnaire surveys, and onsite surveys to determine the risk of human rights violations. The MHI Group also has a grievance process whereby employees and third parties can report suspected violations of MHI Group policies.

Remediation of Loss of Income

The MHI Group continues to assess the impact of our business on communities and to implement analysis and procedures as outlined in the *MHI Sustainability Databook*.

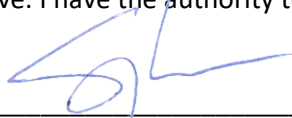
Training

In addition to the training on the Global Code of Conduct, Starting in fiscal year 2022. The MHI Group introduced an e-learning course to promote an understanding of human rights and the MHI Group's commitment to human rights. All members of the MHI Group receive annual training on the MHI Global Code of Conduct and how to report actual or suspected violations. The MHI Group is committed to ensuring that our staff understand and can identify modern slavery, forced labour and child labour risks in our supply chains and business, we continue to develop and provide appropriate training.

Further details on the Mitsubishi Group companies can be found at:

https://www.mhi.com/network/text_version.html

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. I have the authority to bind Mitsubishi Power Canada, Ltd.



Sheldon Myhre
President & CEO

May 28, 2024

Mitsubishi Power Canada, Ltd.