



# Report on Fighting Against Forced Labour and Child Labour in Supply Chains Act

Joint Report Pursuant to the Fighting Against Forced  
Labour and Child Labour in Supply Chains Act



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Mont Louis Onshore Wind

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# About This Report

This is a joint report by Northland Power Inc. (“Northland”) and its subsidiaries (see Appendix 1), each of which is directly or indirectly controlled by Northland, in order to comply with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) for the reporting period covering January 1 to December 31, 2023. Note that the contents of this report and the policies described herein are applicable to Northland and its subsidiaries as a whole (hereinafter, collectively, “Northland”, “our” or “we”).

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# Structure, Activities and Supply Chains

## Structure and Activities

Northland is a global power producer dedicated to developing, building, owning and operating clean and green global power infrastructure assets in Asia, Europe, Latin America and North America. Our facilities produce electricity from clean-burning natural gas and renewable resources such as wind and solar.

Established in 1987 and headquartered in Toronto, Canada, today Northland has global offices in ten countries. As of December 31, 2023, Northland owns or has an economic interest in 3.2 GW (net 2.9 GW) of operating generating capacity and a significant inventory of early to mid-stage development opportunities encompassing approximately 12 GW of potential capacity.

Northland has been publicly traded since 1997 and our common shares trade on the Toronto Stock Exchange under the symbol NPI. As of December 31, 2023, Northland has a total of 1,344 employees globally, working out of the Toronto head office and at our various global offices, project sites and operating facilities.

Northland’s business has evolved since it’s origins, from supporting Canada’s transition away from coal with biomass and natural gas to our present portfolio of diversified global renewable assets. In 2023 Northland began to operate under a new structure, comprised of three distinct business units (BUs), each focused on a specific generating technology:

1. Onshore Renewables
  - Solar PV
  - Onshore wind
  - Concentrated solar
  - Battery storage
2. Offshore Wind
3. Natural Gas & Utilities



Nordsee One  
German North Sea  
(photo credit: Ulrich Mertens)

# Northland's Business Units



## Efficient Natural Gas and Utilities

- Type**
- Efficient natural gas generation
  - Electricity distribution

**Gross Capacity<sup>1</sup> 722 MW**

**Generation<sup>1</sup> 3,430 GWh**

- Business Impact**
- Long-term offtake agreements generate predictable cashflows

- Sustainability Impact**
- Supports scaling of renewables by ensuring grid reliability amid fluctuating conditions

## Onshore Renewables

- Onshore wind and utility-scale solar power generation
- Energy storage globally

**1,449 MW**

**Under construction: 250 MW | Under development: 3,327 MW**  
with a 4 hour duration (storage)

**2,302 GWh**

- Long-term offtake agreements generate predictable cashflows
- Energy storage business complements renewables business

- Generates clean power
- Storage facilities support scaling of renewables by ensuring grid reliability amid fluctuating conditions

## Offshore Renewables

- Offshore wind power generation

**1,184 MW**

**Under construction: 2,162 MW | Under development: 6,290 MW**

**4,438 GWh**

- Long-term offtake agreements generate predictable cashflows

- Generates clean power

<sup>1</sup> In 2023



## Governance

The board of directors of Northland (the “Board”) is committed to the highest standards in its governance practices and is focused on overseeing Northland’s vision to be a top clean and green developer, constructor, owner and operator of sustainable infrastructure assets. Northland is constantly evolving its practices with respect to the formulation and implementation of policies, standards and practices regarding its human rights, health, safety, climate change and environment-related risks.

The Board, through its various committees, is responsible for the oversight, review and compliance of many of Northland’s key policies including the Human Rights Policy, Code of Business Conduct and Ethics, Supplier and Partner Code of Conduct, Anti-Bribery and Corruption Policy and Whistleblower Policy. Management of Northland, under the direction of the Board, has undertaken a number of initiatives to help promote ethical behaviour by its employees, including new employee onboarding, email updates regarding new or revised policies, as well as annual training and attestation with respect to key corporate policies



## Supply Chains

Each year, Northland works with suppliers and vendors around the world. It is imperative that we clearly articulate our Environmental, Social and Governance (ESG) values and what we stand for as a company to this entire supplier ecosystem. While our construction efforts are mostly supported by our largest suppliers, we also have long-term contracts for operations, maintenance and corporate services across our value chain.

Northland is a developer, constructor and operator of large-scale power infrastructure assets, and, in practice, many suppliers may change from year to year. Additionally, capital expenditures vary from year to year depending on project needs and phasing, limiting the effectiveness of year-on-year comparisons. Our global supply chain includes suppliers located in Asia, Europe, the United States and Canada. Northland is primarily focused on capital expenditure procurement for the development and operations of sustainable infrastructure assets, including, but not limited to wind turbines, towers, turbine foundations, the use of (installation) vessels, electricity cables, offshore and onshore substations, batteries, solar panels, inverters and trackers. The areas of our business and supply chain that may include risk of forced labour and/or child labour include production and manufacturing processes, construction/installation activities and mineral supply chains.

In 2023, Northland reached financial close for three projects located in Canada (battery storage), Taiwan (offshore wind), and Poland (offshore wind). For these three projects Northland has contracted global suppliers to provide key components for the construction of these assets. In 2023, early-stage construction commenced for these projects, with construction focused on:

- Fabrication of the wind turbine foundations
- Wind turbine fabrication & delivery
- Foundation installation
- Battery & transformer fabrication

Beginning in 2023 and throughout the construction of these assets, the suppliers will manufacture the main components required in the following countries:

- In the case of wind turbine and associated components manufacturing, Germany, United Kingdom, Denmark, Spain, Poland, Slovenia, Belgium, Italy, Turkey, France, Finland, Brazil, United States, Czech Republic, Taiwan, Vietnam, South Korea
- In the case of battery storage manufacturing, China, Mexico

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## Our Vision

At Northland, we are building a sustainable and carbon-neutral world together: Our work is grounded in our vision to become a global leader in developing sustainable infrastructure assets. We are pushing the energy sector forward by creating innovative solutions that build a net-positive business. This translates to driving socio-economic value in the communities where we operate, bringing local markets closer to a carbon-neutral future and preserving our natural resources through renewable power generation. As developers, owners and operators of energy facilities across the globe, we are poised to transform how the world is powered to produce long-term impact for our people and our planet.

For additional information on Northland's business please refer to our [Annual Report](#) and [Sustainability section](#) of our website.

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## Steps taken to prevent and reduce **risk of forced labour and child labour**

In 2023, Northland conducted reasonable due diligence and implemented policies and procedures to identify and understand risks related to our supply chain. Through collaboration amongst various departments and groups across the organization and through engagement with our suppliers, vendors and contractors, we sought to manage and mitigate risks where identified through a variety of methods. In general terms, Northland took the following steps in 2023 to prevent or reduce the risk of forced labour in its supply chains:

- Introduced a new Board-approved Human Rights Policy and Standard Operating Procedure;
- Continued to engage with key suppliers on Environmental, Social and Governance (ESG) performance and onboard suppliers into our EcoVadis network;
- Assessed our two international project-financed developments against international standards, including the Equator Principles;
- Conducted mandatory training on modern slavery and human rights for all Northland employees;
- Conducted mandatory training on our Anti-Bribery and Corruption Policy and Whistleblower Policy for all Northland Employees; and
- Conducted a Social Impact Assessment and implemented project-level policies and mitigation measures when applicable.

Details of these actions are described throughout this Report.



Oneida - Megapack battery arrival on project site

# 5 Policies and Due Diligence

Northland takes a proactive approach to identifying risks within our value chain and thus conducts thorough due diligence of suppliers, vendors and contractors in parallel with negotiating contractual agreements. We also utilize contractual language to ensure continued compliance with Northland's policies and expectations. We conduct reviews throughout the project life cycle, from initial market analysis to supplier due diligence and monitoring. We work with our partners and suppliers to promote greater transparency and minimize the risk of violation of our policies and codes of conduct.

## Key Policies and Documents

Our policies apply to internal activities and conduct, our work with partners in communities where we conduct business, and to activities within our value chain, including, but not limited to, prohibiting the use of forced labour and/or child labour. Our policies maintain that all employees and contractors have the right to equal employment opportunities, freedom of association, dignity, privacy, and the right to safe and fair work without fear of discrimination or violence based on ethnic background, culture, religion, sexual identity or orientation, race, gender, ability or other factors.

When necessary, Northland and its partners also implement project-level policies. In 2023, our Hai Long Offshore Wind project in Taiwan published its own Human Rights Policy, which applies to all project employees, including contractors. The policy outlines the Project's commitment to providing a safe and healthy working environment, promoting equality and diversity, and ensuring fair labour practices including the prohibition or use of forced labour or child labour.

We are also a signatory to the United Nations Global Compact, committed to applying its 10 principles in the areas of human rights, labour, environment and anti-corruption in our strategy, culture and everyday business.

### Human Rights Policy

Introduced in 2023, our Human Rights Policy outlines Northland's governance and due diligence process to identify and mitigate risk of human rights violations within our business and supply chain. This policy states Northland's commitment to upholding human rights in accordance with the United

Nations (UN) Guiding Principles on Business and Human Rights and other international laws and standards.

### Global Code of Business Conduct and Ethics

Northland's global Code of Business Conduct and Ethics (the "Code") applies to employees, officers, directors, consultants and representatives of Northland. It provides guidelines with respect to conflicts of interest, respect in the workplace, social responsibility, human rights, diversity, compliance with laws and Northland's commitment to ethical and honest conduct. All employees sign the Code, during the onboarding process and are informed of changes and updates on an annual basis.

### Global Anti-Bribery and Corruption Policy

Northland's Global Anti-Bribery and Corruption Policy states our zero-tolerance approach to bribery and corruption and complements our Code of Conduct and Business Ethics. This policy reiterates our commitment to conducting business in an ethical manner, with integrity and transparency and includes reporting obligations with respect to gifts, donations / community investments and meetings with public officials.

### Supplier and Partner Code of Conduct

We expect our partners, suppliers and vendors to adhere to our Supplier and Partner Code of Conduct, to comply with applicable laws, to uphold our values in respecting the highest standards of health and safety, environmental management, human rights and labour rights, and to act with transparency, integrity and respect.

Our Supplier and Partner Code of Conduct is both a business agreement and social contract to help guide our partner and supplier relationships. It helps mitigate risks and lays the foundation for honest and transparent relationships built on accountability and shared responsibility.

### Global Whistleblower Policy

Northland's Whistleblower Policy enables employees, other stakeholders and third parties to safely report actual or suspected misconduct or actions that violate the law or our Code of Business Conduct and Ethics.

### Our Commitment to Diversity, Inclusion and Belonging

Our Commitment to Diversity, Inclusion and Belonging describes six key pillars to uphold across the business to ensure diversity and inclusiveness remain at the core of who we are and how we operate. We strive to foster and environment that is inclusive and where people of all backgrounds and abilities are respected and valued.

### Our Commitment to Local Communities and Indigenous People

We take pride in our approach to establishing, building, and cultivating strong, mutually beneficial relationships to garner trust and support from local communities. This enables us to develop, construct and operate our projects while acting as trusted partners to local and Indigenous communities.

## Due Diligence and Risk Management

As we grow and expand into new regions, we analyze any heightened risk of human rights issues, including forced labour and child labour. We are committed to mitigating and managing these risks for our people, our communities and within our business. As described above, our policies guide how we conduct business with our employees, and external groups in which we work with, such as our suppliers, vendors and contractors.

When relevant, Northland completes assessments of potential adverse human rights impacts and social impacts, in accordance with the Equator Principles, International Finance Corporation Performance Standards and World Bank Industry Sector Guidelines. In 2023, two assessments of this nature were undertaken.

The following describes the tools and mechanisms we use to identify and manage ESG-related risks within our supply chains:

### Digital Software

In 2023, Northland's procurement team launched a new digital tool to conduct Requests for Information (RFI) and Requests for Proposals (RFPs) in a consistent manner. This tool supports Northland in conducting pre-qualification screenings for potential suppliers and requesting information on an organization's ESG practices, including but not limited to human rights. This tool is currently being rolled out across the organization for new projects.

### Pre-qualification Questionnaires and Requests for Information

Northland uses a pre-qualification questionnaire to gather information from potential suppliers on ESG programs, including policies and procedures around human rights. These questionnaires or RFI's inform where further due diligence measures may be required, or contractual safeguards may be implemented.

### Human Rights Assessments

Similar to how we conduct Social Impact Assessments, a Human Rights Assessment may be conducted at the project-level when applicable. This type of assessment helps to identify and inform preventative and/or mitigative measures for human rights-related risk within a project, including its supply chain.

### EcoVadis

In 2022, Northland partnered with EcoVadis, a provider of business sustainability ratings, intelligence, and collaborative performance improvement tools for global supply chains. This partnership has become an important part of how we evaluate and onboard our suppliers. EcoVadis provides an actionable sustainability scorecard that arms us with detailed insight into environmental, social and ethical risks including within our global suppliers.

Due to the dynamic nature of our business we can face challenges in building long-term engagement with past suppliers, including incorporating suppliers in the EcoVadis system or obtaining their sign-off on our Supplier and Partner Code of Conduct. We encourage new suppliers to join EcoVadis through sharing our values and contributing to a more sustainable value chain. If EcoVadis is not an option for a potential supplier, we request documentation on sustainability practices, policies and commitments to complete our own screening of ESG performance, including human rights.

Supplier engagement and building longer-term relationships to effect sustainability improvements continues to be a priority for Northland.

### Dow Jones

Northland utilizes the Dow Jones RiskCenter as a tool during our due diligence of suppliers. This tool helps to identify risks associated with a potential supplier as it relates to ethics, antibribery and corruption.

### Social Impact Assessments

Northland works with trusted third-party experts to conduct Social Impact Assessments on development projects to understand the baseline social conditions of a project area and the potential impacts of a project on the local community. These assessments include understanding the labour conditions and the likelihood of forced labour and/or child labour being associated with a project. These assessments are a tool in the due diligence process to help identify and develop mitigation measures for a project as needed.

### Contractual Agreements or Terms and Conditions

Northland's Legal department has developed template terms and conditions which it seeks to implement in agreements with suppliers, vendors and contractors to ensure compliance with our Supplier and Partner Code of Conduct and to impose covenants with respect to any other concerns identified during the due diligent process, including with respect to forced labour and/or child labour.

In 2024, Northland continues to conduct due diligence over our suppliers and potential suppliers through the tools mentioned above, while evaluating opportunities to continue to implement best practices for identifying and understanding the risks associated with our supply chain.



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# Remediation

Northland commits to remediation for any incidents that occur within our operations, the communities where we operate, or through our supply chain. We have local grievance mechanisms at our projects, from construction through operations. We also have a Whistleblower Policy, which applies to all employees, officers, directors, contractors and suppliers of Northland and its affiliates, as well as third party members of the community. Northland will investigate all allegations and protect those reporting in good faith from retaliation and presents all reports made under the Whistleblower Policy to the Audit Committee of the Board. Supporting and protecting those who report wrongdoing encourages all employees to observe the highest standards of business and personal ethics in accordance with our principal business and practices. At this time, Northland has not identified instances of forced or child labour in its activities or supply chains nor the loss of income for vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour within our supply chains. Therefore, no remediation measures have been taken to date. Northland continues to assess its activities and supply chains and consider appropriate means of remediation for forced or child labour should they arise.

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# Training

## Modern Slavery Training

To support further awareness and accountability for our commitment, in 2022, we launched our first mandatory training on Modern Slavery and Human Rights developed by an external provider. This training focuses on providing Northland employees with an overview of modern slavery, its global prevalence and how to combat it through proper business practices. The mandatory training includes an overview on supplier due diligence, highlighting the importance of early detection of human rights risks within the supply chain. In 2023, we continued this training with updates including translations into seven languages and adding reference to Fighting Against Forced Labour and Child Labour in Supply Chains Act.

In 2024, we seek to increase from one training to two mandatory trainings per year focused on human rights and modern slavery.

## Anti-Bribery and Corruption Policy

In 2023, we conducted mandatory training on our Anti-Bribery and Corruption Policy for all Northland employees.

## Whistleblower Policy

In 2023, we conducted mandatory training on our Whistleblower Policy for all Northland employees.

## EcoVadis Training

Since partnering with EcoVadis, Northland has worked with their team to conduct training for our Procurement employees globally. This training is led by an EcoVadis employee and describes how and why EcoVadis is a valuable tool and how to engage suppliers on joining this platform.



Northlanders brainstorming ideas

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## Measuring Effectiveness

Northland's policies are reviewed on an annual basis and if appropriate, modifications are recommended by the Governance and Nominating Committee of the Board to ensure compliance with best corporate governance practices and legislative and policy requirements.

At the project-level, our international projects under construction (Hai Long & Baltic Power) are audited bi-annually for environmental and social compliance during construction. These audits help to identify any non-conformance or areas for improvement in managing our commitments to upholding the highest standards for the environment and our people.

Beyond the mentioned above, no further actions have been taken to assess the effectiveness in preventing and reducing risks of forced labour and child labour in our supply chains.

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## Forward-Looking Information

This report contains statements that constitute forward-looking information within the meaning of applicable securities laws ("forward-looking statements"), including, in particular, statements regarding Northland's operations and operating capacity, human rights commitments, policy development and governance practices, statements with respect to suppliers, vendors and/or contractors and their continued compliance with Northland's codes, policies and contract terms, Northland's ability to meet its proposed objectives and any other statements regarding events or developments that Northland believes or anticipates will or may occur in the future. Northland's actual results could differ materially from those expressed in, or implied by, these forward-looking statements and, accordingly, the events anticipated by the forward-looking statements may or may not transpire or occur. Forward-looking statements include statements that are not historical facts and are predictive in nature, depend upon or refer to future events or conditions, or include words such as "expects," "anticipates," "plans," "predicts," "believes," "estimates," "intends," "targets," "projects," "forecasts" or negative versions thereof and other similar expressions or future or conditional verbs such as "may," "will," "should," "would" and "could."

These statements are based upon certain material factors or assumptions that were applied in developing the forward-looking statements, including the provisions of contracts to which Northland or a subsidiary is a party, management's current plans and its perception of historical trends, current economic conditions and expected future developments, as well as other factors, estimates and assumptions that are believed to be appropriate in the circumstances. Although these forward-looking statements are based upon management's reasonable expectations and assumptions as of the date of this report, they are subject to numerous risks and uncertainties. Some of the factors that could cause results or events to differ from current expectations include, but are not limited to the risk of receiving untruthful or deceptive information from suppliers, vendors and/or contractors, the risk of changes to Northland's supply chain as a result of changes to project needs or the availability of materials or inputs, regulatory or policy changes, and the other factors described in the "Risks Factors" section of Northland's Management's Discussion and Analysis and Annual Information Form for the year ended December 31, 2023, which can be found at [www.sedarplus.ca](http://www.sedarplus.ca) under Northland's profile and on Northland's website at [northlandpower.com](http://northlandpower.com).

The forward-looking statements contained in this release are, unless otherwise indicated, stated as of the date hereof and are based on assumptions that were considered reasonable as of the date hereof. Other than as specifically required by law, Northland undertakes no obligation to update any forward-looking statements to reflect events or circumstances after such date or to reflect the occurrence of unanticipated events, whether as a result of new information, future events or results, or otherwise.

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## 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.



John Brace,  
Executive Chair of the Board of Directors



Spain - Concentrated Solar Plant

# Appendix

- Oneida Store LP, by its managing general partner, Oneida Storage GP Inc.
- Northland Power Services Inc.
- Northland Power Renewable Energy Centre Inc.
- NP Development Holdings Inc.
- Northland Power Properties Inc.
- Northland Power Construction Services Inc.
- Northland Power Development Services Inc.
- Southwest Energy Storage, by its general partner, Southwest Energy Storage GP Inc.
- Marmora Power L.P., by its general partner, Marmora Power GP Inc.
- 2539613 Ontario Inc.
- McLean's Mountain Wind Limited Partnership, by its managing general partner, Northland Power Inc.
- Grand Bend Wind Limited Partnership, by its managing general partner, Grand Bend Wind GP Inc.
- Saint-Ulric Saint-Leandre Wind L.P. / Eoliennes Saint-Ulric Sain Leandre S.E.C., by its managing general partner, NPI Wind Power GP I Inc.
- Mont-Louis Wind L.P. / Eoliennes Mont-Louis S.E.C., by its managing general partner, NPI Wind Power GP II Inc.
- Thorold Cogen L.P., by its managing general partner, Northland Power Thorold Cogen GP Inc.
- Spy Hill Power L.P., by its managing general partner, Spy Hill Power GP Inc.
- North Battleford Power L.P., by its managing general partner, North Battleford Power GP Inc.
- Kirkland Lake Power Corp.
- Northland Power solar Crosby L.P., by its managing general partner, Northland Power Solar Crosby GP Inc.
- Northland Power Solar McCann L.P., by its managing general partner, Northland Power Solar McCann GP Inc.
- Northland Power Solar Rideau Lakes L.P., by its managing general partner, Northland Power Solar Rideau Lakes GP Inc.
- Northland Power Solar Burks Falls East L.P., by its managing general partner, Northland Power Solar Burks Falls East GP Inc.
- Northland Power Solar Belleville North L.P., by its managing general partner, Northland Power Solar Belleville North GP Inc.
- Northland Power Solar Belleville South L.P., by its managing general partner, Northland Power Solar Belleville South GP Inc.
- Northland Power Solar Glendale L.P., by its managing general partner, Northland Power Solar Glendale GP Inc.
- Northland Power Solar North Burgess L.P., by its managing general partner, Northland Power Solar North Burgess GP Inc.
- Northland Power Solar Burks Falls West L.P., by its managing general partner, Northland Power Solar Burks Falls West GP Inc.
- Northland Power Solar Abitibi L.P., by its managing general partner, Northland Power Solar Abitibi GP Inc.
- Northland Power Solar Empire L.P., by its managing general partner, Northland Power Solar Empire GP Inc.
- Northland Power solar Long Lake L.P., by its managing general partner, Northland Power Solar Long Lake GP Inc.
- Northland Power Solar Martin's Meadows L.P., by its managing general partner, Northland Power Solar Martin's Meadows GP Inc.
- 1000380886 Ontario Ltd.
- Jurassic Solar LP, by its general partner, Jurassic Solar GP Ltd.
- Northland Power Luna I Limited Partnership, by its general partner, Northland Power Luna I GP Inc.
- Northland Power Luna II Limited Partnership, by its general partner, Northland Power Luna II GP Inc.



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