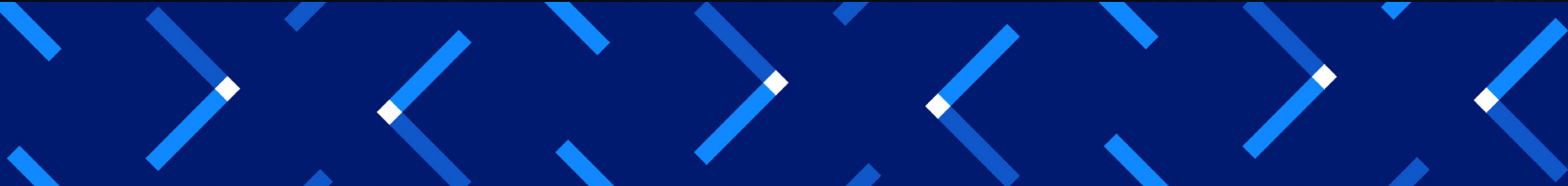




REPORT PURSUANT TO THE
**Act to enact the
Fighting Against
Forced Labour and
Child Labour in
Supply Chains**

PARC ÉOLIEN
NICOLAS-RIOU S.E.C.



MAY 2024

ABOUT THIS REPORT

This is a 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 by Parc éolien Nicolas-Riou S.E.C., represented by its general partner, Parc éolien Nicolas-Riou Commandité inc. (together, “Nicolas-Riou”) for the period covering January 1 to December 31, 2023.

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Our Structure and Activities

Parc éolien Nicolas-Riou S.E.C., represented by its general partner, Parc éolien Nicolas-Riou Commandité inc., is a limited partnership governed under the *Civil Code of Quebec*. Nicolas-Riou is 50-percent owned by Investissement Eolien 1 Inc., a corporation indirectly and wholly-owned by EDF S.A, a French société anonyme (“EDF”) with activities around the world; 33,33-percent by Régie intermunicipale de l’énergie du Bas-Saint-Laurent; and 16,67-percent Régie intermunicipale de l’énergie Gaspésie-Îles-de-la-Madeleine.

Since 2018, Nicolas-Riou has been operating a 224.25 MW onshore wind project that generates and supplies power to Hydro-Québec’s grid. The [Nicolas-Riou wind project](#) is situated in the Bas-Saint-Laurent region, on the private and public lands of TNO Boisbouscache and the municipalities of Sainte-Françoise, Saint-Mathieu-de-Rioux, Saint-Médard (RCM of Basques) and Saint-Eugène-de-Ladrière (RCM of Rimouski-Neigette). Annually, the Nicolas-Riou wind project contributes over \$1.1 million Canadian dollars to the RCMs of Basques and Rimouski-Neigette, for the expected lifespan of the project (25 years).

Our Supply Chain

In 2023, Nicolas-Riou did not engage suppliers for the procurement of goods or equipment. EDF Renewables Services Inc. (“EDF RS”), a corporation responsible for overseeing operation and maintenance activities and indirectly and wholly-owned by EDF, engaged suppliers for general maintenance services for and on behalf of the Nicolas-Riou wind project in 2023. These services included equipment inspections, road maintenance, snow removal, weeding, etc.

At Nicolas-Riou, 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 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

At Nicolas-Riou, we share EDF’s mission and 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 and 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, Nicolas-Riou, through EDF and EDF RS, implemented a comprehensive range of policies and practices within our operations and in our supply chains. These processes include: confirming with 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.

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

Our Policies and Processes Implemented

At Nicolas-Riou, 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 Nicolas-Riou'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., one of the ultimate parent of Nicolas-Riou, is a signatory to the [UN Global Compact](#) since 2001. Nicolas-Riou actively promotes awareness of these [UN Global Compact](#) principles among its suppliers.

In addition to the [UN Global Compact](#), we request to 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 services for Nicolas-Riou, we require our suppliers to operate in a manner that aligns with our sustainability and ethics requirements, as outlined in the [EDF's Sustainability & Ethics Manual](#) (for North America). [EDF's Sustainability & Ethics Manual](#) states that 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 suppliers operate in full compliance with all applicable labour laws. 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 Nicolas-Riou, we contract with suppliers to ensure that we have the goods and services needed to generate and supply energy to Hydro-Québec. 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, Nicolas-Riou did not have any key strategic suppliers engaged in our activities.

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

While Nicolas-Riou 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 and the U.S., 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 (limited to general maintenance services), 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

It should be noted that Nicolas-Riou does not have any employees. As such, we do not consider the training provided to employees on forced labour and child labour to be applicable to our situation in 2023.

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

At Nicolas-Riou, 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 suppliers and others with whom we do business 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 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:



DAN BARKER, TREASURER AND DIRECTOR, PARC ÉOLIEN NICOLAS-RIOU S.E.C., REPRESENTED BY ITS GENERAL PARTNER, PARC ÉOLIEN NICOLAS-RIOU COMMANDITÉ INC.

I have the authority to bind Parc éolien Nicolas-Riou S.E.C., represented by its general partner, Parc éolien Nicolas-Riou Commandité inc.