



May 30, 2024

The Honourable Dominic LeBlanc  
Minister of Public Safety  
Government of Canada

Honourable Dominic LeBlanc,

**RE: Forced Labour in Canadian Supply Chains Report & Questionnaire**

Trans-Northern Pipelines Inc. (TNPI) hereby provides the following report in accordance with *Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act)*, in addition to the questionnaire.

TNPI operates regulated pipelines to safely transport the refined petroleum products (gasoline, diesel, aviation, and heating fuel) used by Canadian businesses and consumers every day. In Alberta, the Alberta Products Pipe Line (APPL) is operated by TNPI and regulated by the Alberta Energy Regulator (AER). We connect refineries in Edmonton to Calgary, including the Calgary International Airport. In Ontario and Quebec, these pipelines are regulated by the Canada Energy Regulator (CER) and connect refineries in Nanticoke, Ontario, and Montreal to the Greater Toronto Area (GTA), with lateral pipelines to Ottawa as well as to Pearson International Airport and Pierre-Elliott Trudeau International Airport. TNPI is committed to operating in a safe and environmentally responsible manner to protect the public, the environment, and the pipelines. For more information about TNPI please visit [www.TNPI.ca](http://www.TNPI.ca).

**1. \*This report is for which of the following?**

Entity

**2. \*Legal name of reporting entity or government institution**

TRANS-NORTHERN PIPELINES INC. / PIPELINES TRANS-NORD INC.

**3. \*Financial reporting year (Required)**

January 1, 2023 to December 31, 2023

**4. \*Is this a revised version of a report already submitted this reporting year? (Required)**

No

**6. \*Is this a joint report? (Required)**

No

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**7. \*Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Required)**

No

**8. \*Which of the following categorizations applies to the entity? Select all that apply. (Required)**

**Canadian business presence:**

- Has a place of business in Canada
- Does business in Canada
- Has assets in Canada

**Meets size-related thresholds (select all that apply):**

- Has at least \$20 million in assets for at least one of its two most recent financial years
- Has generated at least \$40 million in revenue for at least one of its two most recent financial years

**9. \*Which of the following sectors or industries does the entity operate in? Select all that apply. (Required)**

- Transportation and warehousing
- Other, please specify: Pipeline company

**10. \*In which country is the entity headquartered or principally located? (Required)**

Canada

**10.1 \*In which province or territory is the entity headquartered or principally located? (Required)**

Richmond Hill, Ontario

**Annual Report**

**Reporting for entities**

**1. \*What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Required)**

Information not available for this reporting period

**3. \*Which of the following accurately describes the entity's structure?**

Corporation

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**4. \*Which of the following accurately describes the entity's activities?**

Distributing goods in Canada

Note: Distributing goods in Canada is not entirely an accurate selection, but the closest option to choose in the questionnaire. TNPI Transports refined petroleum products (gasoline, diesel, aviation, and heating fuel) used by Canadian businesses and consumers.

**5. Please provide additional information on the entity's structure, activities and supply chains (1,500 character limit).**

TNPI's initial assessment has concluded its activities and operations would be low risk as the activity occurs within Canada by the operation of pipelines in Ontario, Quebec, and Alberta. TNPI acquires limited supplies and goods outside of Canada. For 2023, Procurement identified limited purchases consisting of valves, sleeves and pipeline cleaning devices (pigs) which, due to their technical requirements, are low risk in consideration for forced child labour.

TNPI activities are conducted under the laws of Canada and in accordance with the regulatory authorities having jurisdiction. The Canada Energy Regulatory (CER) for Ontario and Quebec operations and in Alberta, the Alberta Energy Regulator (AER).

TNPI has begun to, and will progress, the following two actions:

- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains.
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour.

**6. \*Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)**

No

**8. \*Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

No, TNPI has not identified parts of activities and supply chains that carry a risk of forced labour or child labour.

**9. \*Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply.**

None have been identified per the list of sectors provided in the questionnaire.

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**11. \*Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

Not applicable, TNPI has not identified any forced labour or child labour in our activities and supply chains.

**13. \*Has the entity taken any measures 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? (Required)**

Not applicable, TNPI has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

**15. \*Does the entity currently provide training to employees on forced labour and/or child labour?**

No

**17. \*Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Required)**

No

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.

Michael Speagle

Director, Business Services & Secretary - Treasurer

May 30, 2024



Trans-Northern Pipelines Inc.

I have the authority to bind the corporation.