

Modern Slavery Report 2023

TRANS POWER UTILITY CONTRACTORS INC.



This Modern Slavery Report (the **Report**) addresses the period from January 1, 2023 to December 31, 2023 and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)* (the **Act**). This Report is made on behalf of Trans Power Utility Contractors Inc. (**Trans Power**). A French version of this Report may be requested from Trans Power Utility Contractors Inc. by emailing mail@transpower.ca.

1. Introduction

Forced labour and child labour, each as defined in the *Act*, are crimes and serious violations of human rights. Trans Power recognizes the important role to ensure that its operations and products, and the supply chains that support these, adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour in its supply chain. This Report sets out the steps taken during Fiscal 2023 to prevent and reduce the risk that forced labour or child labour is used at any step by Trans Power.

2. Trans Power's Business

Trans Power is a company headquartered in Vaughan, Ontario, Canada guiding the installation of high voltage cables, transformers, switchgears, street and highway lighting, traffic signals, telecommunication equipment and natural gas plants for Ontario business, industrial sites, and public works. Trans Power's supply chain includes businesses that supply goods and services to the organization, including:

- Conduit
- Cable
- Street Lighting
- Transformers
- Concrete Bases
- Various Electrical material, and general consumable supplies used in construction
- Office supplies
- Software systems
- Personal protective equipment
- Light trucks and vans

In total, goods and services are procured from approximately forty-four suppliers and contractors. The suppliers include businesses that provide goods to Trans Power.

Further information about the business can be found on the website <https://transpower.ca/>.

3. Guidelines

Brand behaviours and expectations are communicated through organizational and governance guidelines, setting the standards for the business, suppliers, and selling partners, and make it clear that any form of forced labour is not tolerated. Every effort is made, including through carrying out due diligence of supplier practices. Relevant guidelines are discussed in further detail below:

Business Code of Conduct

Trans Power is committed to conducting business in a lawful and ethical manner consistent with the Business Code of Conduct which is the company standard that sets out guiding principles on professional conduct. Employees should always act lawfully, ethically and in accordance with the Business Code of Conduct.

The Business Code of Conduct contains provisions prohibiting the use of Child and Forced labour in accordance with the Act.

Supplier Code of Conduct

Trans Power's Supplier Code of Conduct details the requirements and expectations for suppliers and their supply chains. Suppliers are expected to comply with all applicable legal requirements in the jurisdictions in which they operate and to consistently monitor and enforce the Supplier Code of Conduct in their own operations and supply chain. The Supplier Code of Conduct also sets forth the principles of inclusivity and accountability. The Supplier Code of Conduct is reviewed on a periodic basis to ensure that this policy is in line with current best practices.

Due Diligence

Third parties are expected to adhere to business brand behaviours and expectations and to comply with all applicable laws and regulations. Before making any commitments towards third parties, steps are taken to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

4. Assessing Trans Power's Risk

Trans Power has identified its supply chain partners and engages with them to assess compliance with the Act.

5. Trans Power's Commitments

Steps to Prevent and Reduce Risks of Forced and Child Labour

- Mapping activities
- Mapping supply chains
- Assessing supplier compliance with the Act
- Developing and implementing due diligence processes for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- Requiring suppliers, vendors, and subcontractors to provide a Supplier Certification confirming compliance to and having in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- Monitoring suppliers

- Developing and implementing training and awareness materials on forced labour and/or child labour
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

Remediation Measures

The Business Code of Conduct and the Whistleblower reporting require all employees and contract workers of Trans Power to report actual or possible misconduct. Trans Power also undertakes diligence efforts to ensure that the risk of forced labour and child labour is mitigated in its business. In the event that Trans Power discovers any forced labour or child labour in our business and supply chains, Trans Power takes the following measures to remediate such forced labour or child labour:

- Suspension or termination of a supplier, sub-supplier, or contractor
- Actions to prevent forced labour or child labour and associated harms from reoccurring
- *Grievance mechanisms*

Training

Every year, Trans Power personnel at all levels are required to complete a mandatory review process of the Code of Conduct. Every new employee of Trans Power must complete mandatory training on our brand behaviours and expectations, including Trans Power's Code of Conduct, including Whistleblower reporting. Trans Power provides employees with periodic training to ensure that all employees have current knowledge of Code of Conduct requirements.

6. Trans Power's Progress and Effectiveness

As part of Trans Power's governance processes, Trans Power monitors compliance with its requirements on an ongoing basis. Trans Power also reviews any concerns raised through its Whistleblower reporting and employee feedback. To date no significant concerns or complaints have been identified.

Trans Power also assesses the effectiveness of its policies by setting up a regular review of the organization's guidelines and procedures related to forced labour and child labour.

7. Approval & Signature

This Report was approved by Trans Power's Board of Directors on May 23, 2024 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at <https://transpower.ca/>.

In accordance with the requirements of the *Act*, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for Trans Power. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the *Act*, for the reporting year listed above.



Rob Lister
President and CEO

May 23, 2024

I have the authority to bind Trans Power Utility Contractors Inc.