



Canada Infrastructure Bank

Annual Report under the Fighting Against Forced Labour and Child Labour in Supply Chains Act

2024-2025



Table of content

- 1. Introduction3
- 2. Structure, activities and supply chains3
- 3. Policies and due diligence processes6
- 4. Assessment and management of forced labour and child labour risks 8
- 5. Remediation measures9
- 6. Remediation of loss of income9
- 7. Training and awareness.....10
- 8. Assessing effectiveness 11
- 9. Moving forward..... 12
- 10. Approval 13

Accessibility

The CIB is committed to creating a barrier-free experience for all employees, job-seekers, clients, suppliers and other stakeholders. For any questions about Accessibility or to request any accommodations, please contact your CIB representative or email accessible@cib-bic.ca.

1. Introduction

Purpose of the Fighting Against Forced Labour and Child Labour in Supply Chains Act

The purpose of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) is to implement Canada’s international commitment to contribute to the fight against forced labour and child labour through the imposition of reporting obligations on government institutions producing, purchasing or distributing goods in Canada or elsewhere.

Annual Report

This Annual Report describes the steps taken by the Canada Infrastructure Bank (“**CIB**”) during the reporting period from April 1, 2024, to March 31, 2025 (the “**Reporting Period**”) to prevent and reduce the risk that forced labour or child labour is used in the production of goods purchased by the CIB. The CIB’s mandate and activities do not provide for the production or distribution of goods in Canada or elsewhere.

This Annual Report is prepared in accordance with 6(1) of the Act. In compliance with section 8 of the Act, this report is available to the public on the CIB’s website (<https://cib-bic.ca/en/regulatory-reports/>).

2. Structure, activities and supply chains

Structure

Mandate of the CIB

The CIB is a Crown Corporation established pursuant to the Canada Infrastructure Bank Act on June 22, 2017, and is a parent Crown corporation under section 83 of the *Financial Administration Act*. The CIB is accountable to Parliament through the Minister of Housing, Infrastructure and Communities (the “**Minister**”). The CIB’s purpose is to invest and seek to attract investment from private sector investors and institutional investors, in infrastructure projects in Canada or partly in Canada that will generate revenue and that will be in the public interest by, for example, supporting conditions that foster economic growth or by contributing to the sustainability of infrastructure in Canada.

The CIB develops projects in partnership with federal, provincial, territorial, municipal and Indigenous government sponsors and the private sector. As indicated in the Minister's Statement of Priorities and Accountabilities ("**SPA**"), the CIB makes investments in five priority sectors: Public Transit; Clean Power; Green Infrastructure; Trade and Transport; and Broadband. The SPA is available on the CIB's website (<https://cib-bic.ca/en/about-us/governance/>).

As an impact investor, the CIB is focused on achieving outcomes through its investments to provide clean and reliable electricity to Canadians, increase economic growth, connect communities and build partnerships with Indigenous Peoples to reduce their infrastructure gap and promote economic participation.

Governance and activities

The CIB is governed by an independent board of directors (the "**Board**"), composed of the Chairperson and not fewer than eight, but not more than 11, other directors, appointed by the Governor in Council. The Board is responsible for the overall governance of the corporation in accordance with the Canada Infrastructure Bank Act and by-laws, including the supervision of business operations, forward planning, strategic direction and investment decisions, in line with the Government of Canada's priorities.

The Chief Executive Officer is appointed by the Board for a fixed term, subject to the approval of the Governor in Council. Under the direction of the Chief Executive Officer, the Executive Committee leads the CIB's operations and activities to execute on corporate strategy and objectives, implements organizational policies and procedures, and executes direction from the Board. The Chief Executive Officer reports to the Board on the overall performance of the organization. Executive oversight of the CIB's procurement activities is provided by the General Counsel & Corporate Secretary and the Chief Financial Officer.

For more information on the CIB's governance structure, please see our latest [Annual Report](#).

Offices and employees

As of March 31, 2025, the CIB was comprised of 149 full-time employees located in the CIB's head office in Toronto and our offices in Montreal and Calgary. Third-party consultants and professional service firms are used to supplement resources when the CIB faces short-term increases in activity levels or special projects.

Activities and supply chains

As an investor in infrastructure projects, the CIB does not undertake any pursuits in relation to the production or distribution of goods in Canada or elsewhere, and the CIB does not import goods into Canada. The CIB procures goods and services from external suppliers to effectively deliver on its mandate. The majority of the CIB's procurement activities are related to professional services, such as legal, financial and technical advisors, to conduct investment due diligence activities for infrastructure projects.

The CIB's expenditures for the procurement of goods purchased during the Reporting Period were mainly information technology (IT) and communications equipment, including laptops, software, office supplies, furniture and peripherals. These purchases are predominantly made from Canadian-based distributors and resellers, rather than directly from manufacturers. Consequently, the origin of these goods may be domestic or international, and the CIB's current procurement systems and purchasing arrangements do not enable further analysis of the regions of origin and materials used in the goods purchased.

During the Reporting Period, the CIB's procurement expenditure amounted to approximately \$345,000 for goods and \$18,550,000 for professional services, detailed as follows:

- » 84.4% of total expenditures were related to professional services, including legal, financial and technical advisors;
- » 1.4% of total expenditures were for goods related to technology including cloud solutions, IT hardware, telecommunications and networking; and
- » 0.2% of total expenditures were for goods related to office equipment, including furniture and peripherals

Other expenditures that do not fall within these categories would include facilities and maintenance services and insurance.

3. Policies and due diligence processes

The CIB has adopted a range of enterprise-wide policies and procedures that guide our actions and compliance activities. We use the three lines of risk governance (or three lines of defence) management as part of our enterprise risk management (ERM) framework, risk management processes and procedures and risk management training. Please refer to the CIB's latest [Annual Report](#) for more information on the CIB's risk management framework.

Code of Conduct

The [Code of Conduct for Personnel](#) (the “**Code of Conduct**”) incorporates the *Values and Ethics Code for the Public Sector* and describes the guiding principles for ethical conduct that all employees must demonstrate to exercise sound, ethical judgment in their actions and decisions. The Code of Conduct was updated in November 2024 to, among others, outline the CIB's expectations for working with suppliers who share our commitments for promoting ethical and sustainable business practices, including respecting human rights. In addition, the CIB's obligations under the *Canadian Human Rights Act*, and compliance with applicable laws and regulations are embedded in the Code of Conduct. Each employee is required, upon joining the CIB and annually thereafter, to certify their compliance with the Code of Conduct and acknowledge that they have a duty to prevent, correct and promptly report their knowledge of a potential breach of CIB's policies. Non-compliance with the Code of Conduct may result in disciplinary measures.

Disclosure of Wrongdoing Policy

The [Disclosure of Wrongdoing Policy](#) describes the internal procedures regarding the disclosure wrongdoing in the workplace or breach of the CIB's policies, legislation or regulations. The Chief Executive Officer has designated the General Counsel & Corporate Secretary as the Senior Officer accountable for supporting the Chief Executive Officer in meeting the requirements of the *Public Servants Disclosure Protection Act*.

Procurement Policy and Principles for Suppliers

The [Procurement Policy](#) describes the principles, policies and procedures in respect of the procurement of goods and services to ensure the CIB receives the best value for the goods and services required for its operations and that these goods and services are purchased in

a manner that is professional, fair, transparent, consistent, cost effective and cost-efficient. The Finance and Audit Committee of the Board is responsible for approving revisions made to the Procurement Policy and receiving reports on compliance.

The Procurement Policy was last updated in February 2024. The CIB has adopted Principles for Suppliers (the “**Principles**”) included in the schedule to the Procurement Policy. The Principles are aligned with the Government of Canada’s requirements, including the *Code of Conduct for Procurement*, and set expectations for all current and prospective suppliers related to ethical and responsible business conduct, human rights and labour standards, Indigenous rights and environmental stewardship. Suppliers are expected to report any instances of non-compliance with the Principles and cooperate with any request by the CIB to monitor the Supplier’s performance under the Principles.

Internal Fighting Against Forced Labour and Child Labour in Supply Chains Framework

During the 2023–2024 reporting period, the CIB developed an internal risk management framework (the “**Framework**”) to support the CIB’s commitment to fight against modern slavery and ensure compliance with the Act. The Framework sets out the operational expectations (e.g., procurement, risk management and training) and reporting requirements of the CIB with respect to the procurement of services or purchase of goods in order to meet the objectives of the Act. The Framework also describes the guiding principles, governance structure and roles and responsibilities to effectively reduce the risk of modern slavery in the CIB’s supply chain.

4. Assessment and management of forced labour and child labour risks

During the Reporting Period, the CIB prioritized the review of its standard agreements for goods and services procured to include specific contractual clauses and covenants regarding the supplier's responsibilities to mitigate the risk of modern slavery occurring in their business, operations and supply chains.

During the Reporting Period, similar to the previous reporting period, the CIB conducted an internal risk assessment of its procurement activities and largest suppliers to identify risks related to forced labour and child labour in our supply chain. The suppliers were selected based on the total expenditure for goods purchased by the CIB during the Reporting Period. Acknowledging that this risk assessment can be further refined, the largest expenditures for goods were procured from Canadian-based distributors and resellers for office equipment, including laptops, furniture and peripherals.

Although the CIB's risk assessment for forced labour and child labour in its workplace and procurement activities is low, the CIB acknowledges that inherent and residual risks of modern slavery may be present in later tiers of the supply chain for certain product categories, such as technology hardware and other office equipment. The technology hardware industry is also considered to have a higher risk, which may be intensified in countries with a higher prevalence of modern slavery according to the Global Slavery Index. Consequently, the CIB prioritized its largest suppliers of IT and communications equipment in its risk assessment. Our review of suppliers within this category revealed that each supplier has published policies or reports in accordance with applicable legislation against modern slavery and forced child labour in supply chains.

5. Remediation measures

The CIB has not identified any cases of forced labour or child labour in our activities and supply chains during the Reporting Period.

The [Code of Conduct](#) requires all personnel to proactively and promptly report any illegal or unethical behaviour, including violations or suspected violations of the Code of Conduct, policies, a law or regulation.

The Disclosure of Wrongdoing Policy outlines the process for the confidential and anonymous submission of concerns of wrongdoing, including those related to human rights, through IntegrityCounts an independent third-party reporting service, which can be accessed online (<https://integritycounts.ca/org/cib-bic>). Concerns or suspected breaches reported on IntegrityCounts are reported to the General Counsel & Corporate Secretary for appropriate action. Moreover, under the Public Servants Disclosure Protection Act, federal public servants, including CIB personnel, may make a disclosure of wrongdoing to the Public Sector Integrity Commissioner of Canada.

6. Remediation of loss of income

The CIB 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.

7. Training and awareness

The CIB recognizes that CIB personnel are the “*first line of defence*” for managing risks associated with procurement and supplier management activities. Consequently, during the Reporting Period, all personnel completed mandatory training on the CIB’s Procurement Policy, including the CIB’s obligations under the Act and awareness of forced labour and child labour supply chain risks. Additionally, all CIB personnel completed their annual attestation of compliance with the Code of Conduct in March 2025.

During the Reporting Period, employees with oversight and managerial responsibilities for procurement activities continued to participate in various training and awareness activities about the CIB’s responsibilities under the Act. The General Counsel & Corporate Secretary and the Associate General Counsel (Enterprise Legal) attended the information sessions hosted by Public Safety Canada in January 2025. The sessions covered updates to the reporting guidance communicated in November 2024 and shared best practices and common errors observed in the first year of reporting. The Associate General Counsel (Enterprise Legal) also attended a webinar hosted by Gowling WLG titled “*A practical update on reporting under Canada’s supply chain reporting law.*”

8. Assessing effectiveness

Corporate Governance and Compliance Policy Framework

Legal and compliance risks are a subcategory of operational risk, and policies and procedures are adopted and implemented to effectively manage these risks across the CIB's operations. The Board approved the CIB's Corporate Governance and Compliance Policy Framework (the "**Compliance Framework**"), which is maintained by the General Counsel & Corporate Secretary and describes the principles and activities for the development and ongoing scheduled review of the CIB's corporate policies and related procedures. The Compliance Framework also catalogues the CIB's various legislative and policy compliance requirements and describes the CIB's reporting requirements and other obligations under its legislative accountabilities. The Human Resources and Governance Committee of the Board monitors the Compliance Framework and receives reports from the General Counsel & Corporate Secretary on the CIB's compliance obligations, including new federal legislation and requirements.

Reviews and audits

The CIB's audit regime consists of an external audit and an internal audit function. The Office of the Auditor General of Canada (OAG) and an independent external auditor jointly conduct an annual audit of the annual financial statements in accordance with the *Financial Administration Act*. The OAG also conducts a special examination at least once every 10 years to confirm that assets are being safeguarded and controlled; that financial, human and physical resources are being managed efficiently; and that operations are being conducted effectively.

The CIB's internal audit function serves as the "third line of defence" to strengthen accountability, risk management, resource stewardship and governance. Risk-based, multi-year audit plans identify key risk areas and annual audit plans are approved by the Finance and Audit Committee of the Board. The internal audit plan will include a review of procurement practices and compliance with the Procurement Policy, including the processes adopted in compliance with the Act, which is expected to be completed during the 2025-26 reporting period.

9. Moving forward

We remain committed to improving our efforts to address the risks of forced labour and child labour in our operations and supply chains. In the next year, we plan to continue to prioritize the following activities:

- » Implement the Principles for Suppliers as part of our procurement activities (e.g., RFP documentation provided to respondents);
- » Review and update the CIB's standard contract templates to include covenants from suppliers confirming their acknowledgment of the CIB's expectations under the Principles for Suppliers, including our commitment to respecting human rights and prohibit the use of forced labour and/or child labour in their operations and supply chains;
- » Provide mandatory training to personnel covering the CIB's obligations under the Act and policies and due diligence processes in relation to forced labour and child labour, including the Principles for Suppliers;
- » Implement the Framework for supplier risk management assessments; and
- » Communicate the CIB's expectations related to ethical and responsible business conduct, human rights, in alignment with the purpose and objectives of the Act.

10. Approval

This Annual Report was approved by the Chief Executive Officer, in his capacity of the head of the government institution, pursuant to section 6(1) of the Act.

Approved on May 30, 2025.

“Ehren Cory”

Chief Executive Officer of the Canada Infrastructure Bank

