



Fighting Against Forced Labour and Child Labour in Supply Chains Act

Annual Report 2024
Halifax Port Authority



Executive Summary

The purpose of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* as it relates to government institutions is to contribute to the international fight against forced labour and child labour by enacting reporting obligations on producing, purchasing, or distributing goods in Canada or elsewhere.

The Halifax Port Authority (HPA) is taking steps to reduce and eliminate instances of modern slavery in its supply chains. This report outlines measures taken to increase awareness and transparency to prevent and reduce the risk that forced labour or child labour was used at any step in the production of goods produced, purchased, or distributed by HPA for the financial year ending December 31, 2024.

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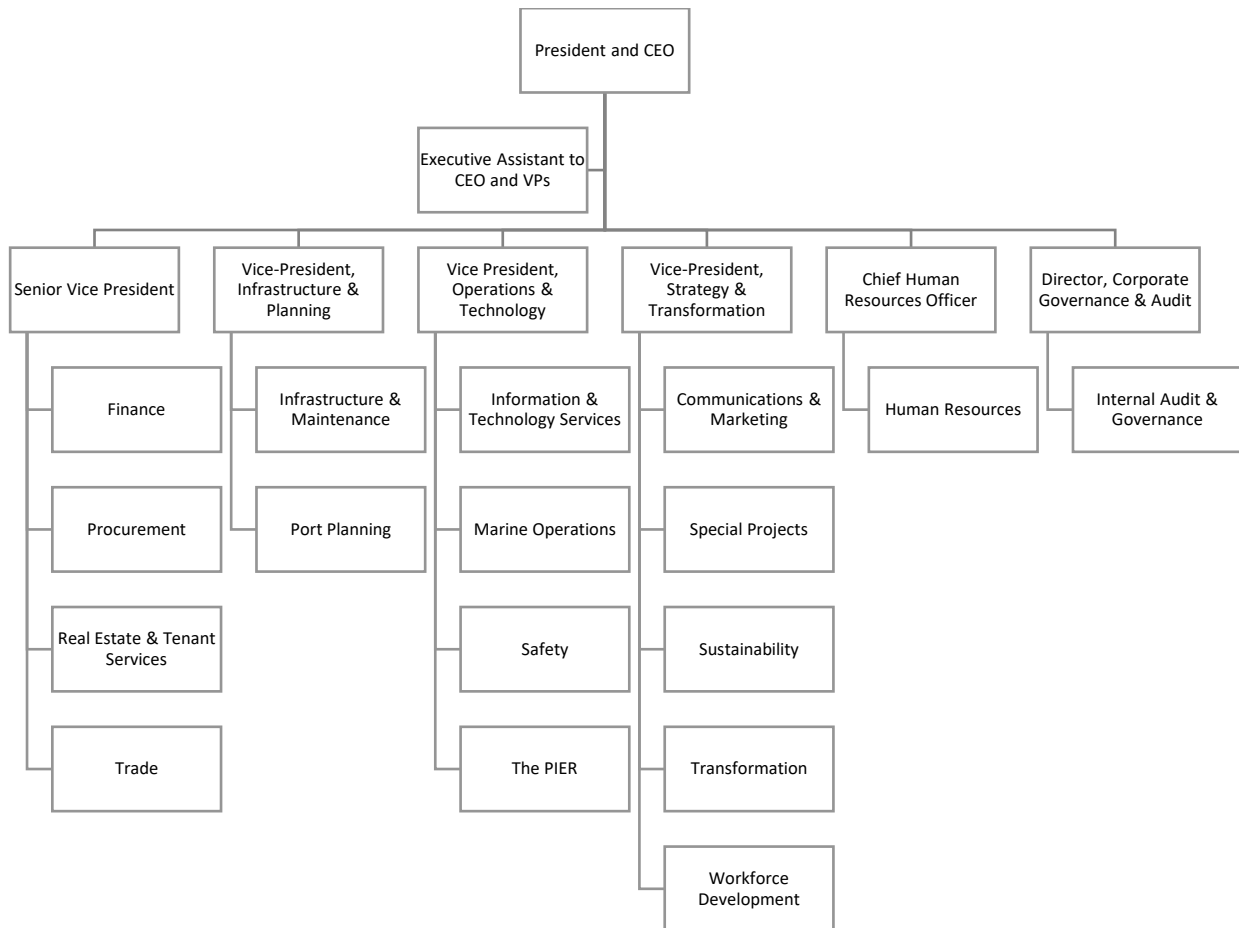
HPA Structure, Activities, and Supply Chains

The Halifax Port Authority (HPA) was created on May 1, 1999 by letters patent issued by the Minister of Transport pursuant to Section 8 of the *Canada Marine Act*. HPA is a Canadian Port Authority operating as a federal agent of the Crown, in accordance with the *Canada Marine Act*. HPA is governed by a Board of Directors, and reports to Parliament through the Minister of Transport.

HPA is responsible for administering Halifax Harbour and has a mandate to develop, market and manage approximately 265 acres of federally owned marine industrial land in the harbour and all adjacent federal waters for regional and national economic benefit. HPA is committed to driving economic growth through the development and promotion of its three significant lines of business: cargo, cruise and real estate.

HPA employs 107 full-time employees from its location in Halifax, Nova Scotia.

Organizational Chart



Current as of December 31, 2024

Parts of HPA Business and Supply Chains that Carry a Risk and Mitigation Measures

The Halifax Port Authority does not produce or distribute goods. Materials that are purchased are related to the construction, maintenance, development and administration of industrial marine assets and lands under administration.

- Building and construction
- Technology equipment and services
- Office supplies
- Operational supplies and services

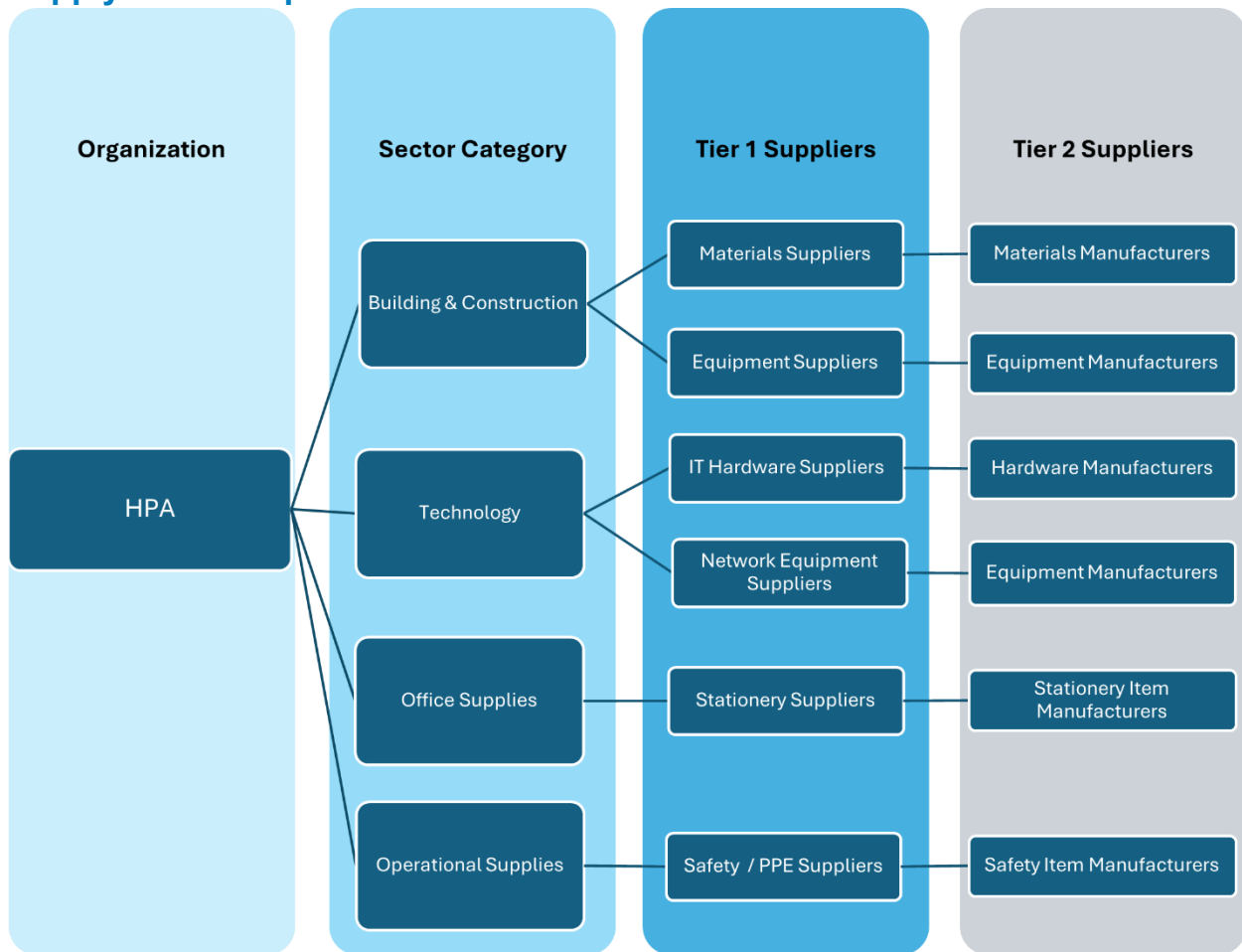
The majority of Tier 1 suppliers providing goods for HPA are Canadian companies which carry a lower risk of child labour and forced labour being used in the production of goods and materials. Generally, the higher risk for child labour and forced labour is found within Tier 2 suppliers.

Actions Taken to Reduce Risk Associated with Forced Labour or Child Labour

HPA took the following steps to identify and reduce the risk of forced labour or child labour in its business and supply chains:

- Developed and approved a Procurement Policy and supporting framework which integrates respect for human rights, the environment, and social and responsible corporate behaviour into procurements by including measures to identify, mitigate and disclose risk that human trafficking, forced or child labour, or any other unethical business practice is occurring in HPA supply chains.
- Supply chain mapping of Tier 1 suppliers as part of the development and implementation of the Procurement Policy.
- Information and awareness sessions were held with employees across the organization to inform, educate and answer questions about the actions HPA is taking to reduce the risk associated with forced labour and child labour.
- Identified high-risk items with increased risk of forced or child labour used in manufacturing and adjusted supply chain accordingly.

Supply Chain Map

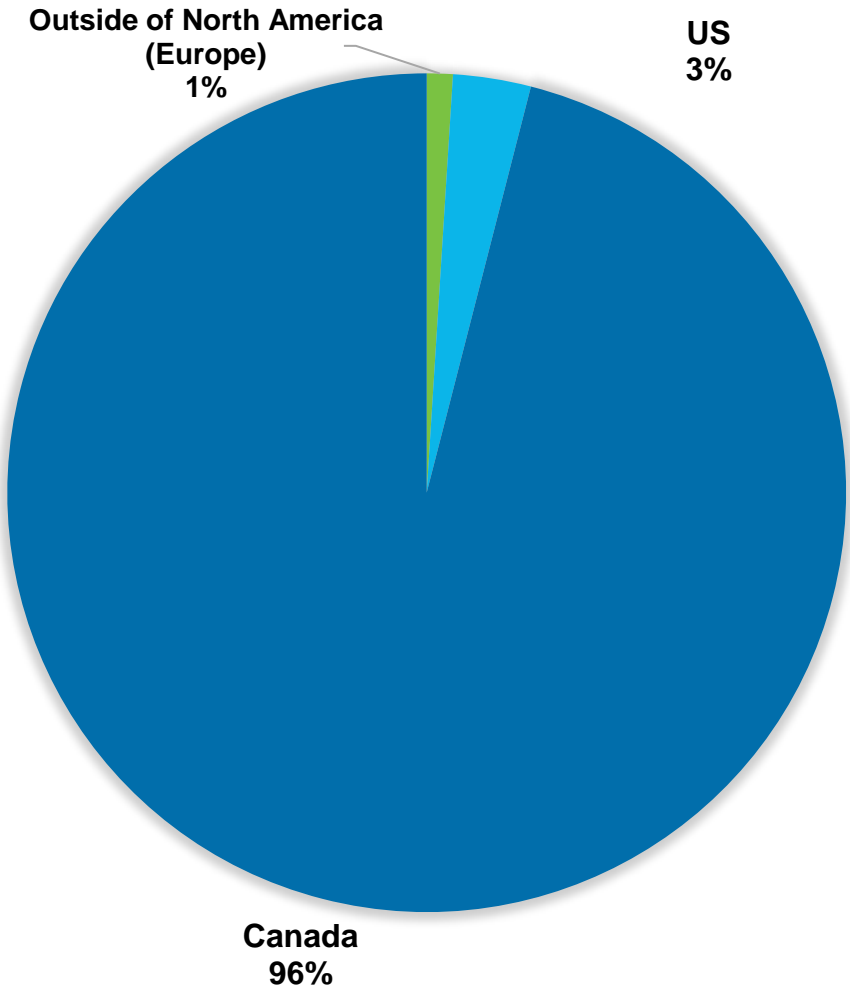


HPA's Approach to Procurement

HPA sources its suppliers through both competitive and non-competitive procurement processes and in accordance with its Procurement Policy. HPA is committed to supporting enterprises whose core objectives include advancing equity, diversity, inclusivity, socio-economic interests and/or building healthy communities. This includes a commitment to supporting Nova Scotia businesses as much as possible.

As shown in the chart below, in 2024, 96% of HPA's supply chain remains within Canada, with over 63% of its Canadian suppliers located in Nova Scotia.

Tier 1 Suppliers – By Country of Origin



Current as of December 31, 2024

Policies and Due Diligence Processes

HPA has corporate and management level policies in place to provide all levels of the organization with transparent guidance on how to achieve corporate objectives and reduce risk. The content below provides an overview of the policies at HPA related to reducing the risk of forced labour and child labour being used in supply chains.

Procurement Policy

HPA's Procurement Policy integrates respect for human rights, the environment, and social and responsible corporate behaviour into procurements by including measures to identify, mitigate and disclose risk that human trafficking, forced or child labour, or any other unethical business practice is occurring in HPA supply chains.

It includes a risk-based system of internal controls that are maintained, monitored, and reviewed to provide reasonable assurance that procurement transactions are carried out in accordance with the framework, and applicable laws, regulations, and policies. It also provides guidance on contract management with clearly defined roles, responsibilities, accountabilities, and procurement exceptions.

Conflict of Interest/Code of Conduct and Post-Employment Policy

The ethical conduct of business is critical to the success of the HPA. Ethical business conduct at the HPA goes beyond compliance with the law; it means a commitment to integrity in all business operations. The Halifax Port Authority Conflict of Interest/Code of Conduct and Post-Employment Policy is reviewed and signed by all employees at the start of their employment.

Whistleblower Policy

HPA is committed to ensuring it carries out its mandate and responsibilities in accordance with the highest standards of professional ethics, and in compliance with the law. HPA has adopted a Whistleblower Policy to help maintain these standards and promote a culture of accountability.

It is the responsibility of department managers and executive members to take all appropriate steps to prevent improper conduct in their respective areas of responsibilities. HPA expects any employee, executive member, or board member who has knowledge of or believes that they have witnessed an act of improper conduct to report the incident immediately.

HPA will take all necessary steps to protect the identity of the whistleblower unless the whistleblower consents to being identified, HPA is legally required to identify the whistleblower, or it is necessary for HPA to effectively investigate or respond to the complaint or matters disclosed in the investigation.

Actions Taken to Remediate Forced Labour or Child Labour

HPA has not identified any forced labour or child labour in its supply chains. No actions were taken to remediate forced labour or child labour in 2024.

Actions Taken to Remediate the Loss of Income for Those Affected by Mitigation Measures

HPA has not identified any forced labour or child labour in its supply chains. No actions were taken in 2024 to remediate the loss of income for those affected by mitigation measures.

Training Provided to Employees

A company-wide awareness program to identify and mitigate risks associated with forced labour and child labour in supply chains for all management and employees was developed. Information sessions were held with all departments to educate employees about forced labour and child labour and answer questions.

How HPA Assesses its Effectiveness

Our procurement processes include a risk-based system of internal controls that are maintained, monitored, and reviewed to provide reasonable assurance that procurement transactions are carried out in accordance with the framework, and applicable laws, regulations, and policies.

The number of awareness training sessions is tracked and a reporting process for potential cases has been established.