

## **2024 Report on the Fight Against Forced Labour and Child Labour in Supply Chains Act**

### **1. Introduction**

This report is made pursuant to section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act").

This report has been jointly prepared for Holland Power Services Inc. and its wholly-owned subsidiary company, 748953 NB Ltd., operating as Gagnon Line Construction (collectively the "Entity"). This report covers the procurement period between January 1, 2024 and December 31, 2024. In this report, the terms "Holland", "we", and "our" refer to both entities.

### **2. Organizational Structure, Activities and Supply Chain**

Holland is a wholly owned subsidiary of Alectra Inc.

Holland employs around 125 people on a full time basis and has a casual workforce of up to 1,500 people. Most of this workforce is engaged via contracts for on-call casual work. Our employment contracts and workplace policies are regularly reviewed to ensure compliance with workplace laws.

Holland's mandate is to provide safe, reliable, efficient / cost effective power restoration services for utility partners across the United States and from Ontario to the east coast of Canada.

As a restoration contractor, our role is to repair and restore electricity safely and reliably, at a reasonable cost. The primary resource of Holland is skilled labour, supported by the use of vehicles and specialized tooling required to perform such services.

Depending on which stance you take on the definitions, and the thresholds for compliance of Bill S-211, Holland may or may not be required to comply. While we have a place of business in Canada, do business in Canada, and have assets in Canada, the compliance obligations for Bill S-211 are not fully clear. As per our latest financial statements, two of the three thresholds for compliance are satisfied. The definition of a good, however, in the normal sense of the word, would not include the restoration of electricity services. Despite the size of the organization in comparison to the Act's thresholds, and without further clarity on the definition of a good, Holland has chosen to comply.

### 3. Our Policies and Due Diligence Commitments

Holland is committed to being a workplace that is trusted by employees, contractors, customers, and consultants.

All Individuals are expected to adhere to the highest ethical standards of behaviour to perform their work in a manner that is consistent with our corporate values to preserve and enhance the reputation of Holland. All Individuals have the right to work in a safe and healthy environment and one that is committed to providing safe and healthy working conditions. Compliance with applicable laws and standards, exercising good judgment in avoiding or dealing with conflicts of interest, the protection of privacy, and maintaining confidentiality are foundational to achieving the company's ethical standards and goals. All individuals are responsible for reviewing, understanding, complying with, and acknowledging the policy. Individuals who are new to Holland are required to review and acknowledge the Respect in the Workplace Policy during their onboarding or before commencing work and have the obligation of ensuring their own personal compliance with this policy. Individuals must also report any known or suspected non-compliance or potential non-compliance with the Respect in the Workplace policy.

We encourage employee actions that align with our purpose, and to be a long-term community partner. We maintain a respectful workplace free of discrimination, sexual harassment, and workplace harassment, and believe that all workplace incidents, illnesses, and environmental impacts are preventable and that no task or production schedule is more important than the mental and physical health of a worker, the safeguarding of the public, or the protection of the natural environment. Holland is committed to meeting the needs of current and future generations by empowering its customers, communities, and employees, protecting the environment, and embracing innovation.

Holland complies with all applicable provincial and federal laws and regulations as a minimum standard. All employees acting on behalf of Holland are expected to comply with this commitment and all related corporate policies, including:

#### Laws and Regulations

- Employment Standards Act
- Labour Relations Act
- Municipal Freedom of Information and Protection of Privacy Act
- New Brunswick Human Rights Act, RSNB
- New Brunswick Employment Standards Act
- Quebec Commission des normes, de l'équité, de la santé et de la sécurité du travail (CNESST)
- Ontario Human Rights Code, R.S.O. 1990
- Occupational Health and Safety Act as amended, R.S.O. 1990 ("OHSA)

#### Internal Codes & Policies

- Respect in the Workplace Policy
- Health & Safety Policy
- Workplace Equity, Diversity and Inclusion Policy
- AODA - Integrated Accessibility Standards Regulation (IASR) Policy

#### Hiring Practices & Policies

Within the various policies and hiring procedures, Holland adheres to the following extracted items:

- Job opportunities open externally are posted on a variety of website job boards, and on our websites, inviting candidates to apply;
- Complying with provincial regulations, no one under the age of 16 will be employed, and students must be enrolled full time in a community college or university program;
- Employees are entitled to rearrange their work duties without loss of pay in order to observe the religious holiday(s) of their faith; and
- Employees are offered: sick leave, bereavement leave.

Holland strives to only work with suppliers and manufacturers that align with our key principles, behaviours, and core values. All contracts for goods and services require suppliers to comply with applicable Canadian laws.

Working to maintain an open and competitive purchasing environment, Holland has a purchasing program in place to ensure reliable suppliers and contracts. This program ensures that employees in the purchasing department are operating within guidelines towards the procurement of equipment in accordance with industry standards and regulations.

## **4. Addressing Risks of Forced and Child Labour in Our Operations**

Given the adherence to laws, and the policies and procedures in place for all employees, Holland is confident that there is no forced labour or child labour within its employees, all of whom work and reside in Canada or in the United States.

Holland purchases finished products or equipment that is used to provide power restoration services, most notably vehicles or specific tooling. The primary resource of Holland is skilled labour, supported by the use of vehicles and specialized tooling required to perform such services. The products and equipment used must be specifically designed for a few main factors: 1) electricity is dangerous to everyone and anything that is near it, 2) the system is installed and operates in the public domain, overhead along the streets, highways, and underground of the streets and houses. In order to restore a safe, reliable system that will withstand the outside environment in which it is situated for many decades, the majority of the equipment utilized is designed to an industry specification and

must meet performance tests. Therefore, production of electricity equipment requires high quality and precision, which is achieved with a manufacturing sector that has high skill, training, and labour rates. As such, the electricity sector is not prone to forced labour or child labour.

Bill S-211 seeks to help eradicate child and forced labour contributions to the Canadian economy particularly in the areas as identified by the report Ending child labour, forced labour and human trafficking in global supply chains: International Labour Organization, Organisation for Economic Co-operation and Development, International Organization for Migration and United Nations Children's Fund, 2019. The report specifically identifies Africa, Asia, Latin America and the Caribbean as areas of concern.

A review of the equipment used by Holland in power restoration activities notes that the bulk of it is supplied from Canada or the United States of America.

## 5. How We Monitor, Evaluate and Improve

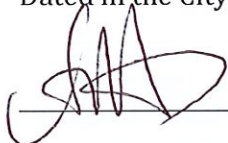
Holland has witnessed no evidence of forced labour or child labour in its supply chains. Given the location and high quality involved in manufacturing the equipment purchased by Holland to be used in its activities, the risk of forced labour and child labour being present in our supply chain is relatively low.

Holland is however committed to working collaboratively with the suppliers we are in business with, along with industry stakeholders to understand where risks are, and where we need to make changes. We are committed to improving our practices to combat forced labour and child labour. We recognise that forced labour and child labour is a real yet hidden issue. We will not tolerate either in our business or supply chain.

## 6. Leadership 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 Holland. 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.

Dated in the City of Fredericton, New Brunswick, this 12 day of May, 2025

A handwritten signature in black ink, appearing to read "S. Hansen", is written over a horizontal line.

Name: Steve Hansen  
Title: Interim President

***I have authority to bind Holland.***