

# Hydro One's Statement Against Modern Slavery

## About this Statement

Hydro One is committed to treating everyone who works at or with Hydro One with dignity and respect. We expressly prohibit the use of modern slavery within our labour force and supply chain. We define modern slavery to mean the severe exploitation of other people for personal or commercial gain. This covers a range of concepts including slavery, forced or compulsory labour, child labour and human trafficking.

In this statement, "Hydro One", the "Company", "we", "us" and "our", means, collectively, **Hydro One Limited, Hydro One Inc., Hydro One Networks Inc., Hydro One Remote Communities Inc. and Acronym Solutions Inc.**, the entities that are making this joint report in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Modern Slavery Act) with respect to their activities during the financial year ended December 31, 2024. Hydro One Limited directly or indirectly controls each of the relevant entities.

## About Hydro One

Hydro One Limited, through its wholly owned subsidiaries, is Ontario's largest electricity transmission and distribution provider, safely and reliably serving customers throughout Canada's largest province. Guided by our purpose of energizing life in Ontario, we look to the future while helping benefit all Ontario in the energy transition today.

## Our Rate-Regulated Business<sup>1</sup>

Our transmission system transmits high-voltage electricity generated by a mix of private and government-owned sources<sup>2</sup> – nuclear, hydroelectric, natural gas, wind and solar – to local distribution companies and industrial customers across Ontario. With 30,000 circuit kilometres of high-voltage transmission lines and 25-cross-border interconnections with neighbouring provinces and the U.S., it accounts for 90 per cent<sup>3</sup> of Ontario's transmission capacity.

We're also the largest distributor in Ontario, with 126,000 circuit kilometres of primary low-voltage lines serving 1.5 million customers, mostly in rural areas. Hydro One Remote Communities Inc. serves customers in 13 grid-connected communities and 12 off-grid communities in Ontario's far north.

<sup>1</sup> Numbers related to transmission capacity, length of transmission, distribution lines and customers are approximate.

<sup>2</sup> Ontario's sources of power are managed by the province's Independent Electricity System Operator (IESO).

<sup>3</sup> Based on the network component of the revenue requirement approved by the Ontario Energy Board (OEB).

Hydro One owns and operates 94% of the transmission system in Ontario when based on the total OEB approved revenue requirement.

## Our Other Businesses

Acronym Solutions Inc. offers a comprehensive suite of information and communications technology.

Ivy Charging Network™, a joint venture between Hydro One and Ontario Power Generation, provides Electronic Vehicle charging network services.

AUX Energy Inc. provides energy solutions to commercial and industrial clients.

## Our Supply Chain

### Who We Are

Hydro One's supply chain group is a centralized functional group that oversees all procurement activities for all Hydro One entities. This includes contract management, supplier risk and relationship management, competitive vendor selection process, new vendor screening and onboarding, supplier surveillance and inspection services, supply chain logistics and warehouse management, and accounts payable services.

Hydro One strives to be a supply chain leader through programs and technologies that protect people, promote efficiency, and manage impacts on the environment. We proactively seek opportunities to create strategic partnerships with suppliers who share our vision of safety and sustainability. Our Supplier Code of Conduct establishes standards of behavior for all our suppliers.

### Supply Chain Mission and Approach

The supply chain group aims to understand and support material and service requirements for all of Hydro One's lines of business. The supply chain group develops sourcing strategies supported by detailed category analytics to help address stakeholders' needs while driving value for Hydro One through strategic procurement decisions. The following practices support the supply chain group and its management of the risk of forced labour and child labour.

Hydro One considers factors beyond price and evaluates suppliers based on total cost of ownership and a range of non-price factors. The supply chain group supports the business in finding suppliers that deliver the greatest value for Hydro One while aligning with our values.

Through supplier performance management and governance, Hydro One negotiates terms and contractual language that helps mitigate risk and helps ensure Hydro One's interests are protected. This includes terms requiring compliance with our Supplier Code of Conduct. Hydro One requires vendors meet financial, health & safety, insurance, and anti-forced labour and child labour requirements.

## Our Goods and Services

As a provider of essential services to Ontario, Hydro One interacts and conducts business with a variety of suppliers. In 2024, Hydro One procured approximately \$2.9B in goods and services. Below is a list of the significant categories of goods and services procured by Hydro One:

- Electrical equipment which includes transformers, circuit breakers, switchgear, wire, cable, conductor and components.
- Instrumentation and control comprised of meters and metering equipment, protection, control and telecom equipment.
- Master service providers for fleet management, software maintenance and support, construction and civic work, environmental services, facility management, and engineering, procurement and construction.

## Operational and Supply Chain Risks

### Identifying Risks

Hydro One assesses risks within our operations and our supply chain including the risk of forced labour and child labour. The assessment examines both internal and external risks (contractor risks and geographic risks). Although the potential for forced labour and child labour is low, the highest area of risk for forced labour and child labour is from our external supply chains.

### Internal Risk

Internal risk is the risk of forced labour and child labour within Hydro One's operations, and this risk has been deemed low. The majority of Hydro One employees are unionized and trained, skilled, and qualified to perform the operation and maintenance of the electrical grid while the remaining employees are qualified management professionals and knowledge workers. All employers including Hydro One, and their employees, are subject to Ontario and Canadian laws and regulations which prohibit forced labour and child labour. Hydro One actively monitors and addresses human rights issues under various policies and procedures including our Code of Business Conduct and Health and Safety Policy. We promote our core values to create a positive culture where employees understand their rights and feel confident speaking up.

### External Risks

#### Contractor Risk

Contractor risk is the risk that our contractors engage in forced labour and child labour in providing services to Hydro One. Contractor services are procured through companies and individuals that are subject to the laws and regulations of Canada and Ontario which prohibit forced labour and child labour. In addition, Hydro One has health and safety policies and procedures including the Supplier Code of Conduct with which contractor companies declare compliance before conducting business with Hydro One.

## Geographical Risk

Approximately 93% of Hydro One’s procurement spend is with direct suppliers based in Canada, while approximately 7% of the spend is with direct suppliers based in United States.<sup>1</sup>

Country	% of Procurement Spend
Canada	92.6%
USA	6.9%
Others	0.5%

<sup>1</sup> Supplier’s base country is based on supplier’s registered location.

## Approach to Risk Mitigation

Hydro One takes the following approaches to help mitigate forced labour and child labour risks in its supply chain, including:

- Establishment of a wide-ranging framework that includes policies and procedures to guide and regulate Hydro One suppliers.
- Day-to-day operations are underpinned by due diligence activities. This involves continuous monitoring and assessing Hydro One’s supply chain.
- Supplier risk assessments are conducted at the time of contract initiation or extension.

Each of these risk mitigation methods plays a key role in helping ensure our commitment to ethical sourcing.

## Hydro One Modern Slavery Risk Governance

### Governance Structure

Hydro One has adopted a human rights oversight and management structure to help ensure accountability at all levels of the Company.

Board Oversight: Hydro One’s Board of Directors (the “Board”) has four standing committees – the Audit Committee, Indigenous Peoples, Safety & Operations Committee, Governance and Regulatory Committee, and Human Resources Committee. The Board reviews and approves the Company’s annual Statement Against Modern Slavery and receives updates on human rights related topics. Updates include presentations and education sessions on supply chain risks and forced labour and child labour reporting requirements.

### Policies and Standards

Hydro One utilizes a framework of policies, procedures, and standards to set expectations and manage our supply chain risks and help mitigate forced labour and child labour risks in our operations and our supply chains. Regular reviews are conducted to assess our progress, helping ensure the relevance and adaptability of these policies, procedures, and standards.

- Code of Business Conduct

The Code of Business Conduct applies to all Hydro One employees, directors, and business partners. The Code of Business Conduct defines how employees, directors, and business partners of Hydro One should act. It outlines Hydro One's core values and helps ensure Hydro One and its employees are behaving ethically and responsibly. In particular, the Code of Business Conduct provides our expectations with respect to health and safety and compliance with all applicable laws, rules and regulations relevant to each person's Hydro One. All employees, directors and business partners are expected to comply with the Code of Business Conduct, report any violations of the Code of Business Conduct and ask questions when in doubt. In addition, supervisors and managers are expected to report to the Corporate Ethics Office any unethical behaviour and provide guidance to employees.

- Supplier Code of Conduct

In 2024, Hydro One updated its Supplier Code of Conduct to include further requirements to help fight against modern slavery. To make informed purchasing decisions that are aligned to our core values and mitigate risk, we have developed and published a Supplier Code of Conduct, which outlines our requirements to suppliers. The Supplier Code of Conduct requires all Hydro One suppliers to comply with Canadian labour and employment laws including strict prohibitions on the use of all forms of modern slavery including child labour, forced labour and human trafficking. All Hydro One suppliers are required to read, comply with and report violations of the Supplier Code of Conduct. Hydro One has the right to audit compliance with the Supplier Code of Conduct. The Supplier Code of Conduct contains whistleblower protections similar to the Whistleblower Policy.

- Whistleblower Policy

The Whistleblower Policy sets out the procedures for representatives and business partners to report violations or potential or suspected violations, of the Code of Business Conduct, applicable laws and other matters.

These procedures include the receipt, retention and treatment of complaints received by Hydro One regarding violations of the Code of Business Conduct and the confidential, anonymous submission by representatives.

## Due Diligence

In 2024, Hydro One reviewed the statements against modern slavery of utility peers. Hydro One's practices are appropriate, are consistent with the best practices of leading Canadian public companies, align with industry direction and demonstrate our commitment to continued improvement.

Hydro One conducts due diligence activities across the procurement process, specifically designed to mitigate forced labour and child labour risks and enhance business operations. Due diligence activities at various stages of procurement are outlined below:

- Prior to entering into a contract:
  - Vendor Screening Processes  
Upon vendor registration in our system, vendors are required to complete a questionnaire. This questionnaire encompasses a review of Hydro One's Supplier Code of Conduct, requiring vendors to acknowledge and declare their compliance with the Supplier Code of Conduct. This standardized process is obligatory for all vendors registered in our system.
  - RFP (Request for Proposal) Questionnaire  
Upon invitation to Hydro One's RFX (Request for Proposal/Information/Quotes) events, vendors are required to complete a questionnaire. This questionnaire encompasses a review of Hydro One's Supplier Code of Conduct, requiring vendors to acknowledge and declare their compliance with the Supplier Code of Conduct. This standardized process is obligatory for all vendors participating in our RFX events.  
In 2024, Hydro One updated RFX questionnaire templates to require suppliers to provide procurement and governance policies related to modern slavery.
  - Contract Terms and Conditions  
Within Hydro One's standard contract terms and conditions, it is a mandatory requirement for all suppliers to provide acknowledgement that they have read and agree to comply with Hydro One's Supplier Code of Conduct.  
In 2024, Hydro One updated our standard contract terms and conditions to reinforce our commitment to eradicating modern slavery in our supply chains. We have added a termination clause, which grants Hydro One the right to terminate agreements with suppliers found to be engaged in practices related to modern slavery.

- Supplier Risk Assessment Tool
 

Hydro One Supply Chain utilizes an application to manage supplier risk that provides real time and actionable supplier risk information. The tool generates an automated risk scorecard using artificial intelligence and advanced analytics and scores each supplier on overall risk and on six established risk domains including financial, cyber, environmental/social, catastrophic, geopolitical, and restrictions. Forced labour and child labour are assessed through environmental/social and geopolitical factors.
- Pre-Award Inspection Program
 

During the RFX process, an inspection of the supplier may occur validating supplier capabilities and potential risks that might not be known during the negotiation stages of new contracts. The program consists of a series of monitoring activities performed during visits to a supplier's plant(s) at various times during the manufacturing cycle of the product. If any risks of forced labour or child labour are detected, they are documented, and further investigation would occur.
- Throughout the term of the contract
  - Supplier Performance & Quality Assurance Inspection Program
 

Inspections may also occur with existing suppliers to assess performance and examine for quality assurance. During the inspections, surveillance activities including records review, test witness and quality inspections are performed to help ensure the inspected supplier plant complies with Hydro One specifications and to report any potential forced labour or child labour violations if observed.
  - Supply Chain Risk Council
 

The Supply Chain Risk Council is a standing committee of supply chain leaders that discuss emerging and continuing risks to Hydro One arising from its supply chain operations as well as progress on risk management plans in execution. The Council helps enable early identification of risks and provides a forum for a collaborative discussion across teams on potential impacts of risk events including severity and probability and risk mitigation efforts required. Any new forced labour or child labour risks would be brought to this Council to plan mitigative actions and discuss potential long-term improvements.
  - Review of Sanctions
 

Hydro One performs sanctions and restricted party screening through checking our vendor list against several sanctions and government lists for violations such

as forced and child labour. This monitoring is continuous, and the vendor list is updated twice annually by Supply Chain.

- **Monitoring of Suppliers**

In 2024, Hydro One partnered with a third-party provider to establish an alert system for identifying and addressing potential modern slavery violations related to our suppliers across the world. This system enables reporting of potential incidents related to modern slavery on a regular basis.

Throughout 2024, Hydro One reviewed alerts generated by the system to ensure they were not connected to our supply chain.

## **Measuring Effectiveness**

Hydro One is committed to continuous improvement and measuring the effectiveness of our risk mitigation and due diligence actions. We measure the effectiveness of our modern slavery response based on the following:

- We conducted a review of our policies and procedures to help ensure they support management of forced labour and child labour risks.
- Vendors with procurement spend exceeding \$25k are assessed through Dun & Bradstreet, a service which monitors worldwide sanction lists; none of Hydro One's suppliers have appeared on these sanction lists.
- We conducted reviews of top spend suppliers and reviews of potential modern slavery alerts.
- Suppliers are mandated to acknowledge and declare their compliance with the Supplier Code of Conduct which specifically calls out the prohibition on modern slavery.
- As part of our contract renewal and supplier risk assessment process, we produce and review supplier risk scorecards.

## **Continuous Improvement**

### **Training**

Hydro One provides annual mandatory training sessions to all employees on our Code of Business Conduct and anti-fraud and anti-corruption. The sessions provide employees with an understanding of ethical standards, helping ensure alignment with our organization's core values. The Code of Business Conduct training reinforces the principles that guide our business practices, helping to foster a culture of integrity and accountability. The anti-fraud and anti-corruption training provides employees with knowledge and tools to identify, prevent and respond to fraudulent activities and corrupt practices.

Hydro One provides modern slavery awareness training to supply chain employees. This specialized training focuses on both forced labour and child labour and helps ensure that Hydro

One remains vigilant against modern slavery risks, promoting responsible sourcing and reinforcing our commitment to ethical business conduct.

### Regular Review and Evaluation

All Hydro One policies and standards, operational process and procedures, and training content are regularly reviewed and updated to reflect emerging risks, legal requirements, and industry standards. Feedback mechanisms from employees are integrated to refine business practices and to help ensure their effectiveness.

### Non-Compliant List

Hydro One maintains a list of companies which are found to engage in problematic business practices, including those that engage in modern slavery or are found to have used modern slavery in their supply chains. Hydro One reviews this list prior to entering into new business relationships.

### Remediating Modern Slavery

Given the limited risk of forced labour and child labour in our supply chain and operations, and no cases of either forced labour or child labour discovered, no remedial measures have been required. If a potential case is discovered, Hydro One will take the appropriate steps with the supplier to remediate and implement corrective action, which may include terminating our relationship with that supplier.

### Forward-Looking Statement

This Statement Against Modern Slavery may contain "forward-looking information" within the meaning of applicable securities laws, including statements regarding: Hydro One's commitments with respect to its employees and business partners; Hydro One's purpose and the energy transition; the supply chain group's outcomes; Hydro One's commitment to continuous improvement and measuring the effectiveness of its risk mitigation and due diligence actions; and, the steps Hydro One would take in the event it discovers forced labour or child labour in its supply chain. Words such as "expect", "anticipate", "intend", "attempt", "may", "plan", "will", "can", "believe", "seek", "estimate", and variations of such words and similar expressions are intended to identify such forward-looking information. These statements are not guarantees of future performance or actions and involve assumptions and risks and uncertainties that are difficult to predict. Therefore, actual outcomes and results may differ materially from what is expressed, implied or forecasted in such forward-looking information. Some of the factors that could cause actual results or outcomes to differ materially from the results expressed, implied or forecasted by such forward-looking information, including some of the assumptions used in making such statements, are discussed more fully in Hydro One's filings with the securities regulatory authorities in Canada, which are available on SEDAR+ at [www.sedarplus.com](http://www.sedarplus.com).

Hydro One does not intend, and it disclaims any obligation, to update any forward-looking information, except as required by law.

### **Attestation**

This Statement Against Modern Slavery was approved by the Board of Directors of Hydro One Limited on behalf of Hydro One on May 8, 2025 in accordance with section 11(4)(b)(ii) of the Modern Slavery Act.

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

For clarity, I have provided the attestation above in my capacity as a director and officer of Hydro One Limited and not in my personal capacity.



David Lebeter  
President and CEO

I have the authority to bind Hydro One Limited.

May 13, 2025