

Report under the **Fighting Against Forced Labour and Child Labour in Supply Chains Act** (Canada)

May 2025

This is the report of OPSEU Pension Plan Trust Fund under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “Act”) in respect of its 2024 fiscal year (January 1 – December 31, 2024).

A. Structure, activities and supply chains

The Board of Trustees of the Ontario Public Service Employees’ Union Pension Plan (“OPTrust,” the “Board,” or the “Board of Trustees”) is the legal administrator of the Ontario Public Service Employees’ Union Pension Plan (the “OPSEU Pension Plan” or the “Plan”). The members of the Board are also the trustees of the OPSEU Pension Plan Trust Fund (the “Fund”).

The Province of Ontario (the “Province”) and the Ontario Public Service Employees Union (“OPSEU/SEFPO”) entered into a Sponsorship Agreement dated April 18, 1994, regarding the establishment of the OPSEU Pension Plan. Certain provisions of the Sponsorship Agreement were implemented by the *Ontario Public Service Employees’ Union Pension Act, 1994* (Ontario). The Board of Trustees (including the Plan and the Fund) was established pursuant to a Trust Agreement dated October 25, 1994, between the Province and OPSEU/SEFPO as sponsors of the Plan, and the ten individuals who served as the original trustees.¹

The Board is comprised of ten individuals, five appointed by the Province and five appointed by OPSEU/SEFPO (in a model often referred to as joint governance). The Board and its employees operate under the business name OPTrust. In accordance with its fiduciary duty to Plan members, the Board serves in a strategic and oversight role and has delegated the administrative management of the Plan and Fund to OPTrust’s President and Chief Executive Officer, who in turn, has further delegated responsibilities to other OPTrust employees. As of December 31, 2024, OPTrust had 405 employees.

The Plan provides pension benefits mainly for employees of the Province and various crown agencies, boards, commissions, and certain other employers in the broader public sector in bargaining units represented by OPSEU/SEFPO, as well as certain other employees in the non-profit sector. The Plan had over 114,000 members and \$26 billion net assets available for benefits as of December 31, 2024. The Plan is registered under the *Pension Benefits Act* (Ontario) with the Financial Services Regulatory Authority of Ontario and under the *Income Tax Act*

¹ The Trust Agreement provides that the name of the Fund may be used to designate the Board collectively. Accordingly, the legal name used for purposes of filing a report under the Act is OPSEU Pension Plan Trust Fund.

(Canada) with the Canada Revenue Agency. Further information about OPTrust can be found in its Funded Status Report, published annually and available at optrust.com.

The sole purpose and business of OPTrust is the administration of the OPSEU Pension Plan and the administration and investment of the Fund. All of OPTrust's activities are related to this purpose and business. OPTrust's mission statement is: *Paying pensions today, preserving pensions for tomorrow.*

Accordingly, OPTrust's activities are primarily in the nature of services. OPTrust does not produce or sell any goods. OPTrust does not distribute goods in Canada or elsewhere other than in very limited circumstances in connection with carrying on its business. OPTrust does not import goods for resale purposes. To the extent OPTrust purchases goods for its own use (e.g. office supplies), these goods are primarily purchased from vendors in Canada. However, to a limited extent OPTrust also purchases goods for its own use from vendors outside of Canada and to that extent OPTrust can be considered to be importing goods into Canada for purposes of the Act.

Similarly, OPTrust does not have an extensive supply chain with respect to goods. Goods are purchased in the course of carrying on business (e.g. office supplies or computers) and are primarily purchased from Canadian vendors. To a much lesser extent, some goods are purchased from vendors in the United States, the United Kingdom, Australia and in some cases from online vendors. For online purchases of goods, a concerted effort is made to use vendors where the shipping location is within North America.

In connection with its investments, for purposes of the Act OPTrust may be considered to have control over one business that engages in the activities set out in section 9 of the Act (the "Investment"). The Investment has a different business and risk profile from OPTrust and OPTrust's understanding is the Investment will be filing its own report under the Act.

B. Policies and due diligence processes in relation to forced labour and child labour

The OPTrust Code of Conduct includes guiding principles that are the foundation for decision making and personal conduct for employees of OPTrust. These principles include conducting business ethically and with integrity, honesty and transparency with all parties, including supply chain vendors. OPTrust has other internal policies which set out the standards of conduct to which employees and the Board must adhere. These include an Anti-Bribery, Anti-Corruption & Financial Crimes Policy, a Procurement Policy, and a Whistleblowing Policy.

OPTrust has a specific Vendor Code of Conduct (the "Code") that sets out OPTrust's expectations of its vendors, including prohibiting all forms of forced labour and child labour. The Code is provided to OPTrust's key vendors, such as those who provide goods to OPTrust (including all vendors who provide goods from outside Canada to OPTrust). As part of our vendor management program and vendor due diligence process, we screen vendors against a negative list as one measure to ensure we are conducting business with reputable vendors. Our due diligence process also includes supply chain mapping to determine the location of the vendors from whom we procure goods to confirm that we do not procure goods from vendors in any high-risk regions. We include modern slavery language in vendor contracts as appropriate and possible.

Our investment activities are guided by our Statement of Responsible Investing Principles, which include the responsible treatment of people and communities. OPTrust recognizes that environmental, social and governance factors can materially impact investment risk, return and reputation. The responsible investing principles are incorporated in the investment due diligence process when possible.

C. Parts of business and supply chains that carry a risk of forced labour or child labour being used, and steps taken to assess and manage that risk

The risk of forced or child labour in OPTrust's supply chains is low as a result of the nature of its business operations and the nature or location of the goods sourced. The part of OPTrust's business and supply chains that carry a risk of forced labour or child labour being used is the purchase by OPTrust of goods used to carry on business. OPTrust assesses the risk by considering the nature of the goods purchased, as well as the jurisdiction from which they are sourced. Based on this assessment, in OPTrust's view, the risk that forced labour or child labour is being used in its supply chains is low. OPTrust manages the risk by having appropriate policies and procedures in place and attending educational seminars on managing this risk to ensure we are following market practice.

D. Measures taken to remediate any forced labour or child labour

Not applicable. We have not identified any forced labour or child labour in our activities and supply chains.

E. Measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in activities and supply chains

Not applicable. We have 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.

F. Training provided to employees on forced labour and child labour

OPTrust provides training on the risks of forced labour and child labour being used in OPTrust's activities and supply chains to relevant employees, such as those engaged in the procurement of goods, the investment decision making process, legal counsel, and other employees who support these activities.

G. Assessment of effectiveness in ensuring that forced labour and child labour are not being used in business and supply chains

OPTrust takes various measures, including those described in this report, to reduce the risk that forced labour or child labour is used in OPTrust's business and supply chains. Policies and procedures pertaining to these risks are

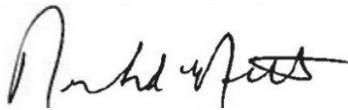
reviewed on a regular basis. OPTrust also monitors prevailing practices for mitigating these risks. As noted above, OPTrust views the risk that forced labour or child labour is used in its business and supply chains as low.

Steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by OPTrust or of goods imported into Canada by OPTrust

OPTrust does not produce goods. OPTrust has taken various steps to reduce the risk that forced labour or child labour is used in goods imported by OPTrust. These steps are described above and include purchasing goods from established vendors in jurisdictions not known to carry a high risk of child or forced labour and providing the OPTrust Vendor Code of Conduct to vendors.

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This report has been approved by the Board of Trustees pursuant to section 11(4)(a) of the Act.



I have authority to bind OPTrust
Richard Nesbitt
Chair
May 8, 2025



I have authority to bind OPTrust
Ram Selvarajah
Vice-Chair
May 8, 2025