

For the year ended March 31, 2025

Manitoba Hydro Report on Supply Chain



This report describes actions that have been taken in support of federal legislation Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C 2023, c.9)

The completion and filing of this report is undertaken on a voluntary basis and without prejudice to the reporting entities' rights to ascertain or challenge the applicability of the referenced legislation to Manitoba Hydro and/or its subsidiaries.

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Identification

Reporting entity: The Manitoba Hydro-Electric Board
(Manitoba Hydro)

Financial reporting year: April 1, 2024 - March 31, 2025 (2024/25)

Revised report: NO

Business number(s): Manitoba Hydro-Electric Board – 122063779
Centra Gas Manitoba Inc – 102445418
Manitoba Hydro Utility Services Ltd. – 871636767
Minell Pipelines Ltd. – 103704524
5022649 Manitoba Ltd. – 861765030
5900345 Manitoba Ltd. – 859085656

Joint report: YES

Manitoba Hydro submits this report for itself and on behalf of its subsidiaries Centra Gas Manitoba Inc., Manitoba Hydro Utility Services Ltd., Minell Pipelines Ltd., 5022649 Manitoba Ltd., and 5900345 Manitoba Ltd.

Reporting obligations other jurisdictions: NO

Categorization: Entity

Sector/industry: Utility

Location: Manitoba



Approval and Attestation

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chain Act (S.C. 2023, c.9) (the “Act”), and in particular section 11 thereof, I attest that

- (a) This report was approved by the Board of the Manitoba Hydro-Electric Board as a joint report of Manitoba Hydro, Centra Gas Manitoba Inc., Manitoba Hydro Utility Services Ltd., Minell Pipelines Ltd., 5022649 Manitoba Ltd., and 5900345 Manitoba Ltd. in accordance with section 11(4)(b)(ii) of the Act.
- (b) I have reviewed the information contained in this report for the entities listed above.
- (c) Based on my knowledge, and having exercised reasonable diligence, the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.
- (d) I have the authority to bind the entities listed above.

Full name: Donald Lorne Bjornson
Title: General Counsel and Corporate Secretary
Date: May 29, 2025

Steps taken to prevent and reduce risk

Actions this year centered on elevating internal awareness, consideration of internal mechanisms, and identification of the departments that will be part of developing an organizational plan.

Requirement a)

Structure, activities and supply chains

Structure and Activities

Manitoba Hydro is a provincial Crown corporation and one of the largest integrated electricity and natural gas distribution utilities in Canada. We provide safe, reliable, and affordable service to over 624,000 electric and 298,000 natural gas customers. Manitoba Hydro operates on Treaty 1, 2, 3, 4 and 5 lands – the original territories of the Anishinaabe, Anishinew, Cree, Dakota, and Dene peoples and the National Homeland of the Red River Métis. We acknowledge these lands and pay our respects to ancestors of these territories. We are one of Manitoba's largest employers and are recognized as a top employer. We conduct our relationships with the utmost integrity and respect for our customers and community as we enhance our province's economic and social growth. We also trade electricity within four wholesale markets in the Midwestern United States and Canada. In fiscal year 2023-24, energy exports to these various markets totaled approximately \$872 million.

On the basis that the following Manitoba Hydro subsidiaries have at least \$20 million in assets and have generated at least \$40 million in revenue in one of the last two fiscal years, Manitoba Hydro is filing this report on behalf of itself and its subsidiaries Centra Gas Manitoba Inc., Manitoba Hydro Utility Services Ltd., Minell Pipelines Ltd., 5022549 Manitoba Ltd., and 5900345 Manitoba Ltd.

Manitoba Hydro Employees:

5,362

Manitoba Hydro Assets:

\$31.53 Billion



Data pertaining to employee numbers, assets, income, and other corporate highlights are based on the 2023-24 annual report. Annual reports are available at: www.hydro.mb.ca/corporate/publications/



Supply Chain

Purchases: \$1.66 Billion (82% domestic)

Total active vendors: 5128 (89% domestic)

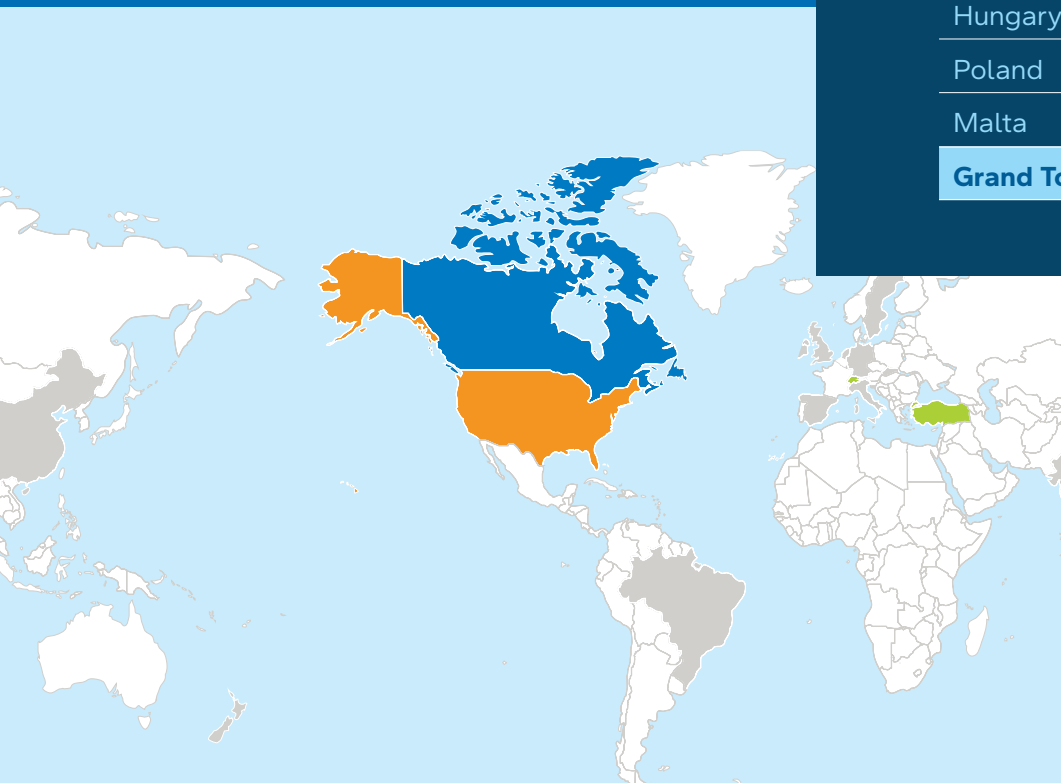
82% of Manitoba Hydro's annual purchases were from domestic vendors, with a significant portion of the annual spend focused on construction and infrastructure. Manitoba Hydro acknowledges that while the majority of our purchases are domestic (Tier I suppliers) there is additional risk of forced and child labour when the Tier I suppliers are distributors, importers or resellers, and goods originate outside of Canada. Additionally, Manitoba Hydro is aware of the risk of forced labour domestically within construction related services.

Amount Spent by Country

Country	Spend
Canada	\$1,363,396,735
USA	\$294,818,783
Turkey	\$2,563,519
Switzerland	\$1,947,279
Sweden	\$282,722
India	\$275,623
Brazil	\$261,512
China	\$200,758
Great Britain	\$97,584
Germany	\$60,274
Ireland	\$56,592
Netherlands	\$39,102
Spain	\$35,331
Italy	\$8,267
Hungary	\$4,162
New Zealand	\$3,423
Grand Total	\$1,664,051,666

Suppliers by Country

Country	# Suppliers
Canada	4,550
USA	513
Germany	11
Great Britain	10
Sweden	8
China	5
Brazil	4
Switzerland	4
Spain	3
New Zealand	3
Australia	3
Chile	2
Netherlands	2
Italy	2
Ireland	2
India	1
Croatia	1
Taiwan	1
Hungary	1
Poland	1
Malta	1
Grand Total	5,128



Amount Spent by Country

- \$1.3B per country
- \$295M per country
- \$2.5M - \$1.9 per country
- <\$1M per country

Requirement b)

Policies and due diligence processes

Existing policies and processes

Manitoba Hydro's **Code of Conduct** sets out the fundamental values and expectations of our organization with respect to ethical business conduct. The Code highlights a number of guiding principles including our commitments to integrity and accountability, safety, the environment, and respect for others by supporting diversity and inclusion, a harassment-free workplace, and legal and regulatory compliance and fairness in human resource management and procurement. The guiding principles identified in our code of conduct are relevant to issues of forced labour and child labour. Manitoba Hydro's **Code of Conduct** is available here:

<https://www.hydro.mb.ca/docs/corporate/code-of-conduct.pdf>

Manitoba Hydro is committed to the safety of our employees, customers and the public. Policies and procedures strive to make the workplace safe for everyone. Manitoba Hydro is committed to the safety of our employees, customers, and the public. Policies and procedures strive to make the workplace safe for everyone. Manitoba Hydro has established a **Fatigue Management Protocol**, and the policy indicates that this protocol may be included as a contractor requirement. There is an internal guide for Managing Contractor Safety and accompanying two-hour eLearning course. Manitoba Hydro requires contractors working in Manitoba to be registered and carry insurance through the Worker's Compensation Board as a due diligence measure.

The **Vendor Performance Management Policy** and the **Vendor Bid Disqualification and Debarment Policy** provide an existing process to address and correct any form of supplier deficiency.

Manitoba Hydro's **Environment, Social, and Governance (ESG) Report** reiterates our commitment to lawful, responsible, and ethical conduct. Forced labour and child labour do not align with the principles and objectives to which Manitoba Hydro is committed. The annual **Environment, Social, and Governance (ESG) Report** is available here: <https://www.hydro.mb.ca/corporate/publications/>

New Actions

In this reporting period:

- Preliminary, exploratory work has been initiated to support the development of a Supplier Code of Conduct for Manitoba Hydro. This work has included a review of existing literature and best practices, as well as analysis of information and recommendations provided by external consultants. It has also involved an examination of supplier codes of conduct implemented by peer organizations within the utility sector and the broader public sector.
- As a result of this initial research, a draft outline for a Manitoba Hydro Supplier Code of Conduct has been created to guide future development and stakeholder engagement efforts.

Code of Conduct:

[hydro.mb.ca/docs/corporate/code-of-conduct.pdf](https://www.hydro.mb.ca/docs/corporate/code-of-conduct.pdf)

Environment, Social, and Governance (ESG) Report:

[hydro.mb.ca/docs/corporate/code-of-conduct.pdf](https://www.hydro.mb.ca/docs/corporate/code-of-conduct.pdf)

Requirement c)

Forced labour and child labour risks

Risk analysis research is still at the developmental stage. Domestic construction and related services are at risk for forced labour. The potential for forced labour and child labour exists through Tier II suppliers.

New Actions

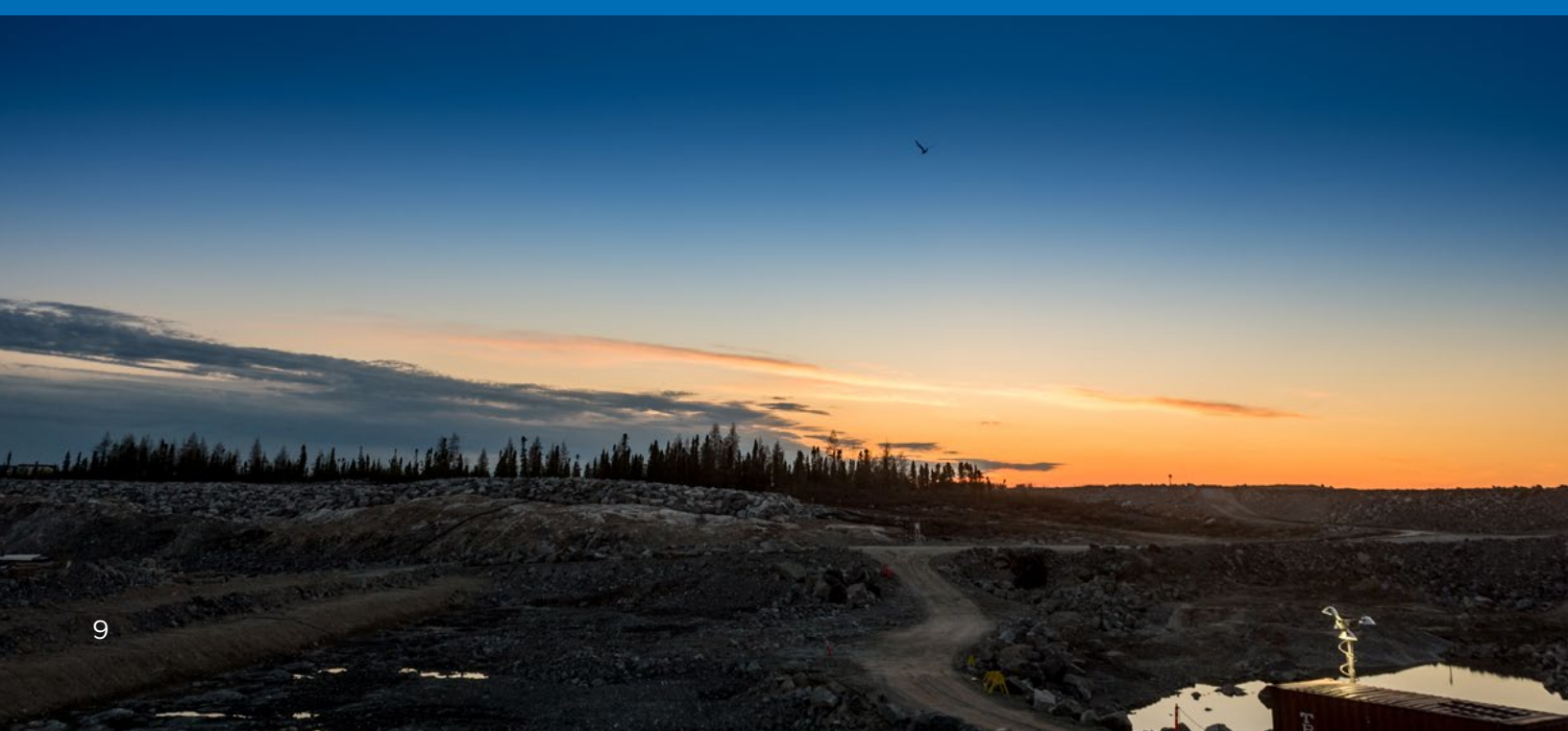
In this reporting period:

- Supply Chain senior leadership attended an Electricity Canada meeting focused on forced labour in supply chains, gaining insight into emerging regulatory expectations, industry challenges, and mitigation strategies.
- Leadership participated in group discussions with peer utilities to further explore the information shared and to exchange perspectives on industry responses and best practices, supporting Manitoba Hydro's efforts to strengthen responsible supply chain practices.

Requirement d)

Remediation measures

As no issues were identified in this reporting period, no remediation efforts were taken. As noted in the response to **Requirement a)**, Manitoba Hydro has an existing **Vendor Performance Management** policy in place, with concrete process steps designed to address and correct issues.



Requirement e)

Remediation of loss of income

As no issues were identified in this reporting period, no remediation efforts were taken.

Requirement f)

Training

No additional training of supply chain personnel regarding forced labour and child labour occurred during this reporting period.

Requirement g)

Assessing effectiveness

Developing a mechanism to assess the effectiveness of actions related to forced and child labour in the supply chain was not part of this year's planned activities. This work is anticipated to be considered in future phases as the program continues to evolve.

