

ONTC Annual S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act Report (2026)

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May 30, 2026

ONTC Annual S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act Report (2026)

Part 1: Introduction to ONTC and Bill S-211 Forced Labour and Child Labour in Supply Chains Act.

This report and statement are made pursuant to Bill S-211, an Act to Enact the Fight Against Forced Labour and Child Labour in Supply Chains. This report and statement outlines the initiatives the Ontario Northland Transportation Commission (o/a Ontario Northland or ONTC) has implemented to identify and address the risks associated with forced labour and child labour in its business operations and supply chains during the fiscal year commencing April 1, 2025 to March 31, 2026.

This report includes the following eight obligatory reporting elements under the Fighting Against Forced Labour and Child Labour in Supply Chains Act and Ontario Northland's policies and due diligence processes in relation to this act:

1. Structure, Activities and Supply Chain
2. Policies and Due Diligence Processes
3. Supply Chain Risk Assessment and Management
4. Measures taken to Remediate any Forced Labour or Child Labour
5. Remediation of Loss of Income to the Most Vulnerable Families as a Result of Measures Taken
6. Awareness Training
7. Asserting Effectiveness
8. Compliance, Enforcement and Attestation

ONTC Identifying Information

Ontario Northland Transportation Company - Identifying Information

- Legal Name: Ontario Northland Transportation Commission
- Trade Name/Operating Name: Ontario Northland
- Other Name: ONTC (abbreviation of our legal name)
- Legal Classification: Corporation Ownership
- Crown agency under the Province of Ontario (Provincial Government Agency)
- Year Established: 1902
- Business Number: R 121700025
- Total Employees: approx. 1200 (all within Canada)
- Head Office: 555 Oak St. E, North Bay, Ontario Canada, P1B 8L3
- Other Offices/locations: Hearst, ON, Cochrane, ON, Englehart, ON, Rouyn QC
- Business Sector: Transportation Services
- Reporting Year: April 1, 2025, and ending March 31, 2026.

Section 1: Structure, Activities and Supply Chain

Structure:

- Ontario Northland Transportation Commission's (ONTC) mission is to improve connectivity between Northern Ontario and other parts of the province to support and foster economic development, job creation and community sustainability. As an agency we work with municipal stakeholders, including Indigenous communities and partners at the Ministry of Transportation. We align priorities which are focused on fulfilling our commitments to be a trusted partner to deliver high quality services. ONTC ensures Northern Ontario communities have access to safe and reliable public transportation. ONTC transports passengers by rail and motorcoach as well as transport goods and commodities by railway serving communities and businesses throughout Northern Ontario, and includes far North communities such as Moosonee and others along the James Bay coast.

ONTC's values are structured around the following pillars:

- **Safety. Full Stop.**
Safety is core to everything we do. We do not settle for less, for our people or our customers-even when operating pressures make it tough to do so.

- **Go Beyond.**
We take pride in serving our customers and communities. We seize every opportunity to exceed their expectations and to challenge the status quo, to meet their evolving needs.
- **Never Stop Caring.**
We care about each other, our customers, the work we do, and how we do it. We create a respectful environment where we can be ourselves, feel valued, and perform at our best.
- **Focus on the Path Ahead.**
We grow and innovate with intention. We align with government and ministry priorities and fulfil our commitments.
- **Lead the Way.**
We can all be leaders. We take responsibility, trust each other to do the right thing, and speak up to make things better.

Activities:

ONTC operating activities occur through 3 core operating divisions (that are supported by a central corporate office), as follows:

Passenger Services - Motor Coach and Railway

- Passenger Services ensures customers traveling by bus or train have the best experience possible. This operating division is responsible for maintaining Ontario Northland's fleet of motor coaches, delivering intercity bus services 365 days/year, as well as affordable parcel shipping via Bus Parcel Express, as well as our passenger rail service which provides an essential all-season land link to/from the James Bay Coast via the Polar Bear Express passenger train. This group strengthens Ontario Northland's province-wide transportation system, ensuring that Ontarians have appropriate access throughout the Province.

Rail Infrastructure and Freight Services

- Rail freight services connect customers to key markets and provides a reliable transportation option for growth opportunities to Northeastern Ontario's manufacturers, mines, and farming communities. Rail freight is Ontario Northland's largest operating group, and they transport everything from mineral and forest products to chemicals and petroleum to and from northeastern Ontario and northwestern Quebec. In addition to rail freight, the team operates Express Freight services between Cochrane and Moosonee, providing a vital service to remote indigenous communities who rely on rail transportation for the shipment of goods that support everyday living in the region. Rail infrastructure is also

responsible for maintaining vital infrastructure to ensure connectivity – there are 2.5 million ties that our rail infrastructure team maintains, in addition to 93 bridges and 2,247 culverts. Ensuring a safe railway is a top priority and rail inspections are a part of the team’s daily routine to maintain safe and reliable service

Repair and Remanufacturing Center

- Remanufacturing, rebuilding and maintaining rail equipment protects Ontario’s transportation system. ONTC’s team of skilled professionals in repair and remanufacturing have completed extensive passenger, freight and locomotive maintenance, light repair, and major overhaul work for more than 100 years. This division maintains and enhances ONTC’s own fleet of freight & passenger cars, locomotives, and rail maintenance equipment. It also completes repair and refurbishment work for several external companies including CN, CP, Rocky Mountaineer, and Metrolinx/GO Transit. The Remanufacturing and Repair team undertakes repair and remanufacturing projects ranging from small to large and is skilled in completing passenger car overhauls which often encompass significant upgrading of electrical and mechanical systems. Our Rail Mechanical team has grown its client base over the past few years, expanding and becoming a preferred vendor for Canadian railroads for locomotive repairs and leasing. Our shops are all located in Ontario (Cochrane, North Bay and Englehart).

Supply Chain Profile:

ONTC’s supply chain strategies and practices are designed to ensure protection of the public interest; to maximize competitive bidding; to reflect public sector purchasing practices and policies; and to promote accessibility by qualified vendors to Ontario Northland’s procurement opportunities.

ONTC supports the “Building Ontario Business Initiative” (BOBI) which is comprised of two distinct approaches and six strategies which are aimed at favoring the purchase of goods within Ontario and Canada before sourcing goods from other countries. This act mandates that public sector entities give Ontario businesses preference when conducting procurements for goods and services under a specified threshold amount. This initiative significantly reduces the risk of forced labour and child labour in the procurement of goods and services. ONTC also follows Ministry Procurement Directives limiting the purchase of goods and services from the USA unless it’s the only feasible option. As ONTC adjusts to the emphasis on domestic supply chain sources, we continue to ensure our focus on assessing risks associated with child and forced labor.

ONTC's Main Supply Chains comprise the following:

- Railway Services - fuel, track materials, locomotive and rail car parts, consumables mainly sourced in Canada and the USA.
- Motor Coach Services - fuel, motor coach parts, tools, consumables sourced in Canada and USA only.
- Railway Car Refurbishment - Structural rail car components, seats, panels, electrical parts, and accessories
- General Commodities - inventory stock supplies such as personal protective equipment, tools, cleaning supplies, office supplies, paints, hardware, etc. Most of our inventory stock supplies are sourced in Canada.

Section 2: Policies and Due Diligence Processes

ONTC has existing employee, human rights, and procurement policies that comply with various legislative requirements. ONTC's Strategic Procurement Policy includes the following directives and trade agreements:

- Building Ontario Business Initiative (BOBI) - This act mandates public sector entities to give Ontario businesses preference when conducting procurements for goods and services under a specified threshold amount.
- Ontario Procurement Restriction Policy
- Bill 194 - Fairness in Procurement Act
- Procurement Directive on Advertising, Public and Media Relations
- Delegation of Financial Authority Policy
- Ontarians with Disabilities Act
- Canadian Free Trade Agreement (CFTA)
- Canada-European Union Comprehensive Economic and Trade Agreement (CETA)
- Canada-UK Trade Continuity Agreement (CUKTCA)
- World Trade Organization Government Procurement Agreement (WTO GPA)
- Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP)
- North American Free Trade Agreement (NAFTA)
- Information Security and Privacy Classification Policy
- Management and Use of Information & Information Technology (I&IT)
- Directive Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

We have updated all applicable policies and processes to reflect and meet Bill S-211's requirements. We utilized the following resources provided by the GOC to enhance our policies and processes:

- [Combating forced labour: A handbook for employers and business | International Labour Organization \(ilo.org\)](#)
- [ILO-IOE child labour guidance tool for business: How to do business with respect for children's right to be free from child labour | International Labour Organization](#)
- [Ending child labour, forced labour and human trafficking in global supply chains | International Labour Organization \(ilo.org\)](#)
- [Child labour and human trafficking remain important concerns in global supply chains | International Labour Organization \(ilo.org\)](#)

Additionally, we have put in place the following procurement processes to help prevent and reduce the risk of forced and child labour for goods that we are purchasing:

- New vendors are required to confirm their knowledge of Bill S-211 to help prevent and reduce the risk of forced labour and child labour in supply chains when completing ONTC's Supplier Registration Form to be onboarded as a new vendor with Ontario Northland. Bill S-211 requirements are also included in the new supplier assessment form. This has been in place since December 15, 2024.
- ONTC Buyers / Procurement Officers complete an annual vendor evaluation process to ensure that all existing vendors meet Ontario Northland's specified requirements and adhere to the policies, procedures and ethical requirements that ONTC follows. Vendors are required to confirm their knowledge of Bill S-211 to help prevent and reduce the risk of forced labour and child labour in supply chains. This has been in place since December 15, 2024.
- ONTC includes Bill S-211 provisions in our Vendor Management Process document that is part of our current policies and procedures. All members of the Strategic Procurement department are required to review and acknowledge this policy.
- ONTC ensures that all new Vendors of Record confirm their knowledge of Bill S-211 to help prevent and reduce the risk of forced labour and child labour in supply chains. This requirement was added to the new Vendor of Record Application process effective December 15, 2024.

- ONTC includes Bill S-211 provisions in our Open Competitive Procurement process to ensure vendors are compliant with Bill S-211 to help reduce the risk of forced labour and child labour in supply chains. This has been in place since December 15, 2024.
- ONTC continues to routinely train all procurement staff on the requirements of Bill S-211 and its applicability to our procurement policies and processes. We have promoted the child labor awareness day across the organization utilizing internal news outlets and sharepoint.

Section 3: Supply Chain Risk Assessment and Management

ONTC believes that knowledge is key to being best equipped to identify the parts of our activities and supply chain that carry a risk of forced labour or child labour being used. We are committed to purchasing goods that are ethically sourced, produced and distributed. The International Organization for Standardization and the US Bureau of International Labour Affairs have identified products that are considered to have a high-risk factor of forced labour or child labour.

Goods Category	Inherent Level of Risk	Goods Purchased in this Category by ONTC	Country Purchased From	Risk in Relation to the Country Purchased From
Transportation Equipment and Parts	High	Yes	Canada/US	Low
Electrical and Electronic equipment Components	High	Yes	Canada/US	Low
Fuel	Moderate	Yes	Canada/US	Low

Office Supplies	High	Yes	Canada/US	Low
Construction and Building Materials	High	Yes	Canada/US	Low
Textile, Leather, Furs, Apparel and Shoe Findings, Tents and Flags	High	Yes	Canada/US	Low

Through these resources we have identified a number of high-risk product categories that align with goods we regularly purchase. As part of our assessment process, we have completed an analysis for these categories to determine the inherent risk in our existing supply chains.

- [ISO - International Organization for Standardization](#)
- [List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor \(dol.gov\)](#)

Section 4: Measures Taken to Remediate any Forced Labour or Child Labour

ONTC's Procurement Policy, templates, and processes have been revised to include Bill S-211 provisions and follow the principles identified in the Remediation Guidelines Resource document (see below) provided by the GOC to support the fight against forced labour and child labour.

- [Remediation Guidelines for Victims of Exploitation in Extended Mineral Supply Chains | IOM Publications Platform](#)

We have reviewed our supply chain sourcing options to include choosing goods that are certified and carry the Fairtrade, Rainforest Alliance and UTZ seal to remediate the risk of forced labour and child labour as identified by World Vision Canada in their guide to Ethical Consumerism. It is important to note that the purchasing of goods with the above certification/seals are limited based on the types of goods purchased by ONTC today.

- [A Guide to Ethical Consumerism | World Vision Canada](#)

Section 5: Remediation of Loss of Income to the Most Vulnerable Families as a Result of Measures Taken

At this time ONTC has not identified any loss of income to the most vulnerable families that result from the measures we are taking to reduce the risk of purchasing goods that are due to forced or child labour.

Section 6: Awareness Training

ONTC has imbedded routine awareness training in our orientation and refresher programs for employees involved in supply chain functions, encompassing the following:

- ONTC has an extensive and comprehensive internal learning and training module that is available to our employees. Employees within the Strategic Procurement Department have received and acknowledged the S-211 awareness training. Training will continue for all new supply chain employees. This includes new hire training and learning requirements as part of our onboarding and future refresher approaches.
- The Strategic Procurement Department will continue to promote and enhance corporate policies and processes to reinforce the provisions of S-211 and its focus on preventing and reducing the risk of forced labour and child labour in our supply chains.

The following resource tools are included in the training module that was established by the Strategic Procurement Department and identifies products that are Fairtrade or Rainforest Alliance/UTZ seal certified.

- [Fairtrade Products –](#)
- [Find the Frog | Rainforest Alliance \(rainforest-alliance.org\)](#)
- [Home - KnowTheChain](#)

Additionally, this training includes: i) creating awareness of the reasons why child labour occurs; ii) the risk associated with child labour; and iii) highlights World Day Against Child Labour which takes place annually on June 12.

Reasons Child Labour Occurs:

- Poverty and Economic Factors
- Lack of Access to Education
- Cultural Factors
- Survival Strategies of Families
- Inadequate Laws and Enforcement

Risks Associated with Forced and Child Labour in our Supply Chain:

- Reputational
- Legal
- Financial
- Operational
- Contractual

Section 7: Asserting Effectiveness

ONTC has implemented annual training and reference documentation outlining Bill S-211 forced labour and child labour policy for the Strategic Procurement Department.

This facilitates the Procurement Department's ability to assess current vendors and purchasing processes to ensure that all practices are in line with preventative measures to reduce the risk of forced labour and child labour in supply chains.

The Strategic Procurement Department also added Bill S-211 requirements to the Supplier Registration form as part of the new Vendor on-boarding process to ensure all new vendors are aware of Bill S-211 to help prevent and reduce the risk of forced labour and child labour in supply chains.

ONTC's Buyers and Procurement Officers have included Bill S-211 in their annual vendor evaluation process. Vendors / suppliers will be required to acknowledge that they are following the provisions of Bill S-211 to help prevent and reduce the risk of forced labour and child labour in supply chains.

ONTC continues to promote the World Day Against Child Labour which takes place June 12, annually. We promote it in the internal newsletter to inform and educate all ONTC employees.

- o [World Day Against Child Labour | United Nations](#)

Section 8: Compliance, Enforcement and Attestation

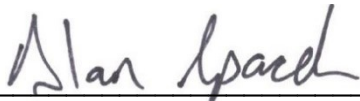
Attestation

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 the entity or entities listed above. 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.

Name: Alan Spacek

Title: Board Chair

Date: April 28, 2026

Signature: 

I have the authority to bind the Corporation.

Online Resource and Webinars:

- [Webinar: Mondaq's Exclusive Forced Labour Guide - Navigating Canada's Anti-Forced Labour Act \(youtube.com\)](#)
- [Navigating Canada's Supply Chains Act to Fight Against Forced and Child Labour \(youtube.com\)](#)
- [Canada's Bill S-211: How Canada is tackling Child Labour in it's Supply Chain. \(youtube.com\)](#)
- [The guide to forced and child labour due diligence \(rightsdd.com\)](#)