

Fighting Against Forced Labour and Child Labour in Supply Chains Act

2025 Report

Our commitment to human rights

As Canada's bilateral Development Finance Institution ("**DFI**"), Development Finance Institute Canada (DFIC) Inc. ("**FinDev Canada**") recognizes its responsibility to respect human rights enshrined within the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We operate in a manner consistent with Canadian law, which embeds the international commitments made by Canada. We strive to align our practices with applicable international standards, frameworks, and principles, including the United Nations Guiding Principles on Business and Human Rights ("**UNGPs**"). In recognition of our responsibilities, FinDev Canada is committed to doing our part to prevent forced labour and child labour in our supply chains.

About this report

This disclosure is intended to meet FinDev Canada's reporting obligations as a government institution under Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (2023) (the "**Act**") for fiscal year 2025. This report outlines the steps taken in 2025 to prevent and reduce the risk that forced labour or child labour is used in the production of goods purchased by FinDev Canada.

About FinDev Canada

FinDev Canada is a Crown corporation and DFI, supporting development through the private sector. We provide financing, investment, and blended finance solutions, as well as technical assistance and knowledge, to promote sustainable and inclusive growth in emerging markets and developing economies aligned with the Sustainable Development Goals ("**SDGs**") and Paris Agreement commitments.

FinDev Canada is a wholly owned subsidiary of Export Development Canada ("**EDC**") that was incorporated under the *Canada Business Corporations Act* and is headquartered in Montreal. As of December 31, 2025, there are 146 staff working in four offices (3 offices in Canada and one in Singapore), supporting FinDev Canada's work and mandate. FinDev Canada is governed by a Board of Directors, appointed by EDC's Board of Directors. The Board, chaired by EDC's President and Chief Executive Officer ("**CEO**"), is composed of members of the EDC Board of Directors, as well as independent members with experience in international development and business in emerging and developing markets. Reporting to the Board, FinDev Canada's CEO, in collaboration with other members of the Executive Team, plans and executes FinDev Canada's business strategy in accordance with FinDev Canada's policies, procedures and frameworks. FinDev Canada, through EDC, reports to Parliament through the Minister of International Trade and Intergovernmental Affairs, in consultation with the Minister of Foreign Affairs and International Development.

FinDev Canada leverages the expertise of our parent company in areas where it would not be cost effective to develop our own internal practice, particularly in specialized corporate services, including procurement. EDC provides fee-based services to support procurement and supplier management to

FinDev Canada under the terms of a Master Service Level Agreement (“**MSLA**”). Executive oversight of EDC’s Procurement function is provided by EDC’s Senior Vice-President, Customer Experience & Chief Legal Officer.

Supply chain profile

As a financial services organization, we do not produce goods in Canada or elsewhere or directly import goods into Canada. FinDev Canada primarily purchases goods, which are typically provided by domestic suppliers who are distributors and resellers rather than directly from manufacturers. While most suppliers of goods are Canadian-based, FinDev Canada acknowledges potential risks deeper in their supply chain. In 2025, our goods procurement was approximately \$249,000, the bulk of which consisted of IT systems hardware and software. In 2025, on behalf of FinDev Canada, EDC purchased a small percentage of goods through Public Services and Procurement Canada (PSPC) and Shared Services Canada (SSC). Both agencies have programs in place to protect human rights in supply chains.

Due diligence process

The management of risks related to activities that fall under the MSLA with EDC require the application of the below EDC and FinDev Canada policies in relation to FinDev Canada’s procurement practices.

We recognize the potential for exposure to forced labour and child labour via our suppliers’ supply chains and activities and will work with EDC to mitigate this through policies and support due diligence processes that EDC is developing that govern how we work with suppliers.

Relevant policies

<u>EDC Code of Conduct</u>	Our aligned codes of conduct include our commitments to respect human rights. Approved by our respective board of directors, these codes apply to both permanent and contract employees.
<u>FinDev Canada Code of Conduct</u>	
<u>EDC Procurement Policy</u>	The policy outlines how we engage suppliers in alignment with EDC’s risk management practices. It is implemented through a more detailed set of internal guidelines that govern EDC procurement and business purchase operations. These include reference to sustainability considerations in decision making, such as respect for internationally recognized human rights, including the provision of safe working environments and fair working conditions that prohibit forced labour and child labour.
<u>EDC Supplier Code of Conduct</u>	FinDev Canada seeks to select suppliers whose corporate values are consistent with ours. The Supplier Code of Conduct sets out the principles and expectations that suppliers must comply with when conducting business with EDC and/or FinDev Canada, including expectations related to human rights and labour standards. New suppliers are required to confirm compliance with the code during supplier registration. Suppliers are required to act in accordance with all applicable laws and regulations governing labour and employment standards, human rights and non-discrimination. The code provides that in jurisdictions where laws and regulations do not adequately

	address human rights, EDC and FinDev Canada expect suppliers to provide the greatest level of protection possible to workers, including prohibiting forced labour and child labour.
<u>Supply Chain Risk Management Solution</u>	In 2025, EDC purchased an information subscription to assist with supply chain tier visibility and tracing. The subscription will enable EDC, on behalf of FinDev Canada, to trace suppliers and analyze supplier sectors, industries, and locations or regions of origin, as well as materials used in the goods purchased thus leading to enhanced due diligence practices.

Training and capacity building

FinDev Canada staff undertake annual mandatory Code of Conduct training. In 2025, EDC engaged a consultant to deliver training on supply chain human rights risks to employees in EDC's Procurement, Third-Party Risk Management, and Environmental & Social Risk Management teams, who also support FinDev Canada under the MSLA. Training remains a cornerstone of both EDC and FinDev Canada's compliance strategy.

Remediation and corrective action

During the reporting period, as there were no indicators of forced labour or child labour, no remediation or corrective actions were undertaken. Moving forward, EDC will utilize the Supply Chain Risk Management solution purchased in late 2025 to enable EDC and FinDev Canada to identify and respond to potential adverse human rights impacts within the supply chain of purchased goods for both respective organizations. Where appropriate, EDC, as relationship manager on behalf of FinDev Canada, will seek to support suppliers in taking corrective action to meet their expectations. Failure to comply may result in termination of the contract.

Assessing our effectiveness

Given the evolutionary nature of human rights practices, FinDev Canada monitors international and national human rights discourse. In 2025, EDC enhanced screening tools and collaborated with federal agencies to align practices, which also apply to FinDev Canada.

Looking forward

FinDev Canada is committed to upholding human rights in all aspects of our business, including through our supplier relationships which are administered by EDC through the terms of our MSLA. This disclosure was developed in consultation with the EDC and FinDev Canada teams responsible for Procurement, Third-party Risk Management and Environmental & Social Risk.



Lori Kerr
Chief Executive Officer, FinDev Canada

April 30, 2026

Legal statement

FinDev Canada has prepared this report for the sole purpose of satisfying its obligations under the Act, for the period of January 1, 2025 to December 31, 2025 and the report is current as of the date indicated herein. The report relates solely to FinDev Canada's reporting obligations under the Act. The report is not intended for any other purpose and shall not be relied upon by anyone for any purpose whatsoever, other than in connection with the Act. Neither FinDev Canada nor EDC shall be responsible for any loss or damage whatsoever arising from the use of this report, or the information contained herein, by anyone other than pursuant to the Act.

This report contains statements about future events and expectations that are forward-looking in nature including, for example, statements about FinDev Canada's goals, targets and commitments related to upholding human rights in all aspects of our business, including through our supplier relationships. FinDev Canada cautions that the accuracy of these forward-looking statements is subject to several factors and uncertainties which could cause actual results to differ materially from our expectations, commitments, and targets.