

Export Development Canada

Fighting Against Forced Labour and Child Labour in Supply Chains

2025 Report



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Our commitment to human rights

Export Development Canada (EDC) is committed to promoting and protecting human rights across our operations. We focus our efforts on influencing better outcomes for people through our own actions and those of our customers. We recognize the importance of eliminating forced labour and child labour from supply chains and align our practices with Canadian law and international standards, including the United Nations Guiding Principles on Business and Human Rights and International Labour Organization conventions. In 2025, EDC continued to strengthen its approach to ethical procurement and supplier engagement.



About this report

This report fulfills EDC's obligations under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act) for the fiscal year ending December 31, 2025. It outlines actions taken in 2025 to identify, prevent, and mitigate risks of forced labour and child labour in goods procured by EDC.

About EDC

Since 1944, EDC has been equipping Canadian companies with the tools they need — trade knowledge, connections and financial solutions, including loans, equity and insurance—to grow their businesses with confidence. Through our range of financial solutions, we supported \$135 billion in exports, foreign investment and trade development activities in 2025. Headquartered in Ottawa, EDC employs over 2,000 people and works in 16 offices across Canada and in 25 locations internationally. Underlying our support is a commitment to sustainable and responsible business, aimed at strengthening the way trade serves society and our planet. EDC is a financially self-sustaining Crown corporation operating at arm's length from the Government of Canada.

Governance and policies

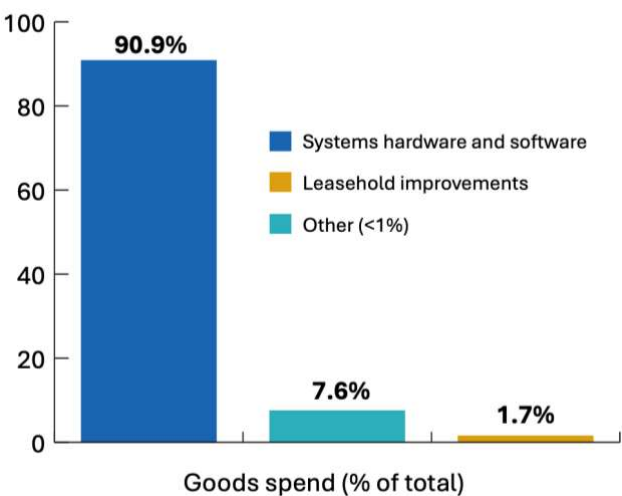
EDC reports to Parliament through the Minister of International Trade. Our Board of Directors, appointed by the Government of Canada, governs EDC and our Executive Management Team drives EDC's strategic direction. The Executive Management Team oversees all operational policies which are approved by the Board of Directors including those related to human rights, labour and procurement.

As EDC's [2025 Materiality Assessment](#) reinforced, human rights and responsible supply chain management continue to be topics of importance to EDC and our stakeholders.

Our [Human Rights Policy](#) provides the principles and commitments that guide EDC's approach to respecting human rights and our internal decision-making for the transactions we support and the actions we take including the procurement of goods and services. Together with this policy, our [Code of Conduct](#), [Procurement Policy](#) and [Supplier Code of Conduct](#) communicate our expectations to our suppliers.

EDC's Senior Vice-President, Customer Experience and Chief Legal Officer, is accountable for the oversight of Sustainability, Procurement and Enterprise Vendor Governance practices.

Supply chain profile



As a financial services organization, EDC does not manufacture or import goods directly.

Procurement of goods focuses on technology and office equipment. In 2025, our goods procurement was \$12.1 million, down slightly from \$12.8 million in 2024. The bulk of goods purchased consisted of IT systems hardware and software. While most of our suppliers are Canadian-based, EDC acknowledges potential risks deeper in its supply chain.

In 2025, we 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

EDC’s Code of Conduct sets ethical standards for employees, our Procurement Policy integrates sustainability considerations and our Supplier Code of Conduct requires compliance with labour and human rights laws and mandates contractual clauses for adherence to these standards.

[Code of Conduct](#)

Our Code of Conduct includes our commitments to respect human rights. Approved by our Board of Directors, this code applies to both permanent and contract employees. All EDC Board of Directors and employees receive mandatory annual training on our Code of Conduct.

[Procurement Policy](#)

The policy outlines how we engage suppliers in alignment with EDC’s risk management practices. We put the policy into practice through our internal Procurement Guideline, which includes 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.

EDC's Procurement Policy is available on our website and is implemented through a more detailed set of internal guidelines that govern EDC procurement and business purchase operations.

[Supplier Code of Conduct \(SCC\)](#)

EDC seeks to select suppliers whose corporate values are consistent with ours. EDC's SCC sets out the principles and expectations with which suppliers must comply when conducting business with EDC, including expectations related to human rights and labour standards. As outlined in the SCC, suppliers are prohibited from engaging in forced or compulsory labour, including any form of human trafficking or involuntary labour. The SCC further requires suppliers to comply with applicable labour and human rights laws in the jurisdictions in which they operate and, where local laws or regulations do not adequately address human rights protections, to apply the highest level of protection possible for workers, including explicit prohibitions on forced labour and child labour.

As part of EDC's supplier onboarding and governance processes, Enterprise Vendor Governance communicates these expectations to suppliers and requires suppliers to acknowledge and adhere to the SCC. Following completion of the Inherent Risk Assessment, suppliers assessed as moderate or high risk are required to complete a Third-Party Risk

Assessment questionnaire prior to engagement. This questionnaire includes a dedicated Environmental and Human Rights section, which contains specific questions related to forced labour and child labour. The results of this assessment are reviewed by the relevant control functions and used to determine whether additional risk mitigation, contractual controls, or risk acceptance are required prior to proceeding.

Supply chain risk management solution

In late 2025, we purchased an information subscription to assist with supply chain tier visibility and tracing. It will enable EDC to trace its suppliers' suppliers and analyze supplier sectors, industries and locations or the regions of origin and materials used in the goods purchased thus leading to enhanced due diligence practices.

Training and capacity building

In 2025, EDC engaged a third-party consultant to deliver training on supply chain human rights risks to employees in our Procurement, Third-Party Risk Management, and Environmental & Social Risk Management teams. Training remains a cornerstone of EDC's due diligence strategy.

Remediation and corrective action

During the reporting period, as there were no indicators of forced labour, no remediation or corrective actions were undertaken. Moving forward, we will utilize the Supply Chain Risk Management solution we purchased in late 2025 to enable us to identify and respond to potential adverse human rights impacts. Where appropriate, EDC will seek to support suppliers in taking corrective action to meet our expectations. Failure to comply may result in termination of the contract.

Assessing our effectiveness

Given the evolutionary nature of human rights practices, EDC continues to monitor international and national human rights discourse. The Supplier Code of Conduct was reviewed in 2023 and updated to include further clarification of language and definitions with respect to forced and child labour. EDC also continues to engage regularly with peer Crown Corporations to conduct benchmarking and share best practices with respect to procurement.

Looking forward

EDC is committed to upholding human rights in all aspects of our business, including through our supplier relationships. This disclosure was developed in consultation with the EDC teams responsible for Procurement, Third-party Risk Management and Sustainability.

Approval



May 1, 2026

Alison Nankivell

President and Chief Executive Officer,
Export Development Canada

Statement of limitation

This report is prepared solely to meet EDC's obligations under the Act for the period January 1 to December 31, 2025. Forward-looking statements are subject to risks and uncertainties that may cause actual outcomes to differ. 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. This report contains statements about future events and expectations that are forward-looking in nature including, for example, statements about EDC's goals, targets and commitments related to upholding human rights in all aspects of our business, including through our supplier relationships. EDC 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. EDC shall not 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.



