2024 Report on Bill S-211:

An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains

1425445 Ontario Limited (operating as "Utilities Kingston") 2024 Report on Bill S-211: Fighting Against Forced Labour and Child Labour in Supply Chains Act

Structure, Activities and Supply Chains

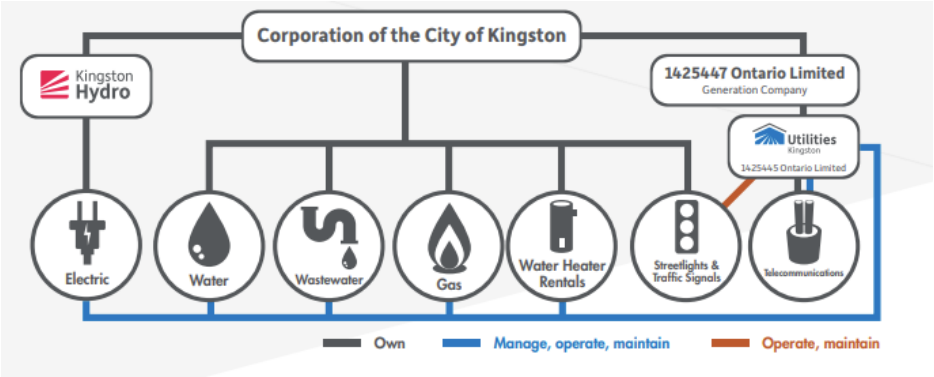
1425445 Ontario Limited (operating as "Utilities Kingston"), referred to throughout as "Utilities Kingston" is incorporated under the Ontario Business Corporations Act. The shareholder is 1425447 Ontario Limited, a wholly owned company of the Corporation of the City of Kingston. Utilities Kingston is committed to manage, operate, and maintain community infrastructure to deliver safe, reliable services to the community and a personal customer experience. The relationship between Utilities Kingston and the City of Kingston, has resulted in solid asset management practices for Kingston, low costs for utility consumers and superior customer service and reliability for the community. By working together, and sharing an understanding of needs of the community, the organizations are poised to best support community goals. These include the growth, development, and climate change goals of the City of Kingston, and further strengthening the unique, local multi-utility model.

Through the multi-utility model, Utilities Kingston manages water, wastewater, natural gas and appliance rental assets of the City of Kingston and operates and maintains the City of Kingston's traffic signal and street lighting infrastructure. Utilities Kingston also owns and operates a Community Broadband Network business, providing broadband network services to organizations and businesses in Kingston that benefits all constituents. In addition, Utilities Kingston also manages, operates and maintains the electricity assets of Kingston Hydro Corporation. Utilities Kingston's customer and community focused multi-utility services in Kingston, Ontario include: safe and reliable water services to 40,000 homes and businesses, wastewater services to nearly 39,000 homes and businesses, gas distribution services to nearly 15,000 homes and businesses, broadband networking that spans over 1,000 route kilometers of fibre optic cable, as well as reliable maintenance and operation of traffic signals at 200 intersections and over 10,000 street lights. The electricity assets that Utilities Kingston manages for Kingston Hydro Corporation bring electricity from the provincial electricity transmission grid to the doors of 28,000 homes and businesses in Kingston.

Utilities Kingston's strength lies in its highly skilled cross-functional team. Utilities Kingston employs 260 people with a diverse set of skills, knowledge and expertise with a high level of collaboration between groups. Employment contracts and workplace policies are reviewed regularly to ensure compliance with workplace laws and regulations. Together, the employees and Utilities Kingston take pride in supporting the community, which benefits from an open, sustainable, and reliable utility. Public

accountability ensures the continuity of vital services that meet the highest safety standards.

Figure 1: Utilities Kingston's relationship with The Corporation of the City of Kingston and Kingston Hydro Corporation



Utilities Kingston is submitting a report on Bill S-211 because the corporation has a place of business in Canada, does business in Canada, has assets in Canada, meets the minimum reporting thresholds for assets, revenue and number of employees, and has imported minimal goods in the reporting year. It is uncertain if Utilities Kingston as a multi-utility **service** provider is considered to be producing, selling, or distributing "goods" pursuant to section 9 of the Act and if the minimal imports would meet any reporting thresholds, without further confirmation Utilities Kingston has chosen to report and comply with the Act.

Policies, Due Diligence Processes, and Training

Utilities Kingston is committed to safe and reliable services and being a workplace that is trusted by employees, customers, and stakeholders. Utilities Kingston employs a diverse set of employees including but not limited to, electricians, GIS technicians, gas operators, millwrights, certified accountants, professional engineers and certified human resources professionals. Continuing education, training and collaboration between groups supports Utilities Kingston employees with opportunities to continuously learn and contribute to the community through creativity and innovation. Employees are encouraged, supported, and equipped with continued training to align with core values to be a trusted and valued community partner.

In 2024, Utilities Kingston implemented a mandatory annual employee training program for all employees involved in the purchasing and approval processes. The training program supports continued enhancements of knowledge, skills, and awareness relating to best practices to continue prevention of forced and child labour throughout the corporation and supply chains, including the importance of ethical sourcing and

informed ethical decisions. All employees involved in the purchasing and approval process successfully completed the 2024 annual training.

Utilities Kingston maintains a respectful workplace and believes that all workplace incidents, illnesses, and environmental impacts are preventable, and that the mental and physical health of all employees and the community are of the utmost importance. Utilities Kingston complies with all applicable provincial and federal laws and regulations as a minimum standard. All Utilities Kingston employees are trained and supported to comply with this commitment and corporate policies and standards.

Laws and Regulations include:

- Employment Standards Act 2000;
- Labour Relations Act, 1995;
- Personal Information Protection and *Electronic Documents Act* (Canada), 2000;
- Ontario Human Rights Code, R.S.O. 1990;
- Accessibility for Ontarians with Disabilities Act (AODA); and
- Occupational Health and Safety Act as amended, R.S.O. 1990 ("OHSA).

Internal Codes & Policies include:

- Code of Conduct;
- Health and Safety Policies and Training;
- First Aid Certification;
- Privacy Policy;
- Customer Privacy Policy;
- Mental Health, Safety, and Well-being Training;
- Ergonomics Training and Assessments;
- Pay Equity Policy;
- Nepotism Policy;
- Preventing Slips, Trips, and Falls Training;
- Compensation and Benefits Training and Awareness;
- Employment Standards Act Training;
- Employee Culture Training;
- Disconnecting from Work Policy;
- Diversity, Equity, and Inclusion Policy, referring to the Ontario Human Rights Code, and Canadian Human Right Act;
- Accessible Customer Service Policy;
- Volunteering Policy;
- Purchasing Policy;
- Employee and Family Assistance Program Training;
- Workplace Harassment and Discrimination Policy; and

- IT Training and Policies.

Figure 2: An excerpt from the Utilities Kingston Employee Culture training

Vision:
Advance the unique multi-utility model to benefit our customers and build better communities

Mission:
Manage, operate and maintain community infrastructure to deliver safe reliable services and a personal customer experience

Our company values are the foundation of our culture

Safety – be safe, be well
Utilities Kingston commits to:
- Ensuring safety of our people in the workplace.
- Engaging our people in matters that affect their health, safety and well-being.
- Supporting initiatives for health and wellness.
- Ensuring public safety of our services and our worksites.
- Looking out for the safety of others and having the courage to intervene.

Integrity – doing what's right
Utilities Kingston commits to:
- Communicating openly, honestly and with respect.
- Recognizing the value of our people.
- Promoting trust and professionalism in our workplace.
- Taking responsibility for our actions; personally and corporately and admitting when we make a mistake.
- Treating our employees and customers with decency and fairness.
- Making decisions that provide the best value for the dollar.

Innovation – challenging the status quo
Utilities Kingston commits to:
- Adopting best practices and opportunities for continued improvement.
- An environment where employees are empowered to pursue new, creative ideas and solutions.
- Exploring new and emerging technologies.
- Implementing solutions to improve service delivery.
- Strengthening communication strategies to improve employee and public awareness.

Reliability – we can count on each other
Utilities Kingston commits to:
- Providing dependable infrastructure for the communities we serve.
- Being accountable to each other.
- Following through, personally and corporately, to get the job done.
- Collaborating and working as one team.
- Sharing our knowledge and expertise.

Utilities Kingston strives to only work with suppliers and manufacturers that align with core values and purchasing policies and that all purchasing is undertaken in a fair and equitable manner. The Utilities Kingston purchasing policy ensures that purchasing is in accordance with industry standards and regulations. The purchasing policy includes that all contractors/suppliers must provide evidence of appropriate insurance and active Workplace Safety and Insurance Board status to be eligible for specified work.

In 2024, Utilities Kingston completed an in-depth review of the code of conduct and purchasing policy to support continuous enhancements. The updated code of conduct and purchasing policy have gone through a review process throughout 2024 with full approval and implementation of the updates in 2025. In 2024, Utilities Kingston launched a review for an updated software system, including demonstrations of software capabilities, to enable and support a thorough supply chain verification process. The selected software system is launching in 2025. Utilities Kingston is committed to continuous review and enhancement of all policies and practices.

Risk of Forced Labour and Child Labour, Mitigation of the Risk

Utilities Kingston adheres to laws, policies, and procedures and is confident that there is no forced labour or child labour within its employees, all of whom work and reside in Ontario, Canada. Utilities Kingston operates in the utility industry with purchases and supply chains involving utility infrastructure equipment, maintenance and materials and supporting resources, including administrative resources for the utility industry for the gas, water, sewer, water heater and broadband equipment and materials that it then uses to assemble according to policies and regulations. Utilities Kingston is highly committed to the health, safety, and well-being of is employees and the community. Bill S-211 seeks to eradicate child labour and forced labour contributions to the Canadian economy particularly in the areas as identified by the report *Ending child labour, forced labour and human trafficking in global supply chains: International Labour Organization, Organisation for Economic Co-operation and Development, International Organization for Migration and United Nations Children's Fund, 2019*. The report specifically identifies

Africa, Asia, Latin America and the Caribbean as areas of concern. Due to the nature of the utility industry, Utilities Kingston's regular activities within the supply chain are comprised within Canada, with minimal levels of imported "goods" from outside of Canada within activities in the reporting year.

Assessment its Effectiveness, Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

Utilities Kingston has witnessed no evidence of forced labour or child labour in its supply chains and activities. Utilities Kingston is launching a new software system in 2025 to support supply chain reviews and verifications and implementing business practices to continue to enhance risk mitigation. Given the industry, location of Utilities Kingston business practices, and the high quality required for equipment and purchases by Utilities Kingston to be used within utility infrastructure and systems, the risk of forced labour and child labour being present in Utilities Kingston's first and second tiers of the supply chain is relatively low. However, Utilities Kingston is committed to collaborative work with suppliers within the supply chain, along with industry stakeholders to understand and assess risks of forced labour and child labour and are committed to enhancing our practices to combat forced labour and child labour. Forced labour and child labour is a real, yet hidden issue and Utilities Kingston will not tolerate either forms of slavery in business practices or supply chains.

Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, we, in the capacity of President and Chief Executive Officer and Chief Financial Officer and Treasurer, Corporate Secretary, attest that we have reviewed the information contained in the report on behalf of the governing body of the entity listed above. Based on our knowledge, and having exercised reasonable diligence, we 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 within this report.

The Utilities Kingston Board of Directors has approved this report and has approved attestation by David Fell and Randal Murphy.

Full Name	David Fell
Title	President and Chief Executive Officer
Date	May 12, 2025
Signature	David Fell

Full Name	Randal Murphy
Title	Chief Financial Officer and Treasurer, Corporate Secretary
Date	May 12, 2025
Signature	

"We have the authority to bind 1425445 Ontario Limited (operating as "Utilities Kingston")."