



**FIGHTING AGAINST FORCED LABOUR AND
CHILD LABOUR IN SUPPLY CHAINS ACT
(the “Act”)**

ANNUAL REPORT FOR 2024 REPORTING YEAR

Identifying Information

Number	Item/Question	Response
1.	This report is for	An “entity” under the Act
2.	Legal Name	The St. Lawrence Seaway Management Corporation / Corporation de Gestion de la Voie Maritime du Saint-Laurent
3.	Financial Reporting Year	Fiscal year ending March 31, 2024.
4.	Is this a revised version of a report already submitted?	No
5.	Business number	873566269
6.	Is this a joint report?	No
7.	Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?	No
8.	The categorizations apply to the entity:	Canadian business presence: <ul style="list-style-type: none"> ✓ Has a place of business in Canada ✓ Does business in Canada ✓ Has assets in Canada Size related thresholds: <ul style="list-style-type: none"> ✓ Has generated at least \$40M in revenue for at least one of its two most recent financial years ✓ Employs an average of at least 250 employees for at least one of its two most recent financial years
9.	Sectors or industries operated in:	<ul style="list-style-type: none"> • Transportation and warehousing • Public administration
10.	Country in which entity is headquartered	Canada

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1.	What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or



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	<p>elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Required)</p> <ul style="list-style-type: none">• Developing and implementing anti-forced labour and/or -child labour contractual clauses
2.	<p>Please provide additional information describing the steps taken (if applicable) (1,500 character limit).</p> <ul style="list-style-type: none">• The below clause was incorporated into Purchase Order Terms and Conditions and Request for Quotes <p>“SUPPLIER CODE OF ETHICS / FORCED AND CHILD LABOUR: The Contractor represents and warrants that no forced labour or child labour, as defined and referenced in the code below has been, or will be, used in the production or performance of the Work or in any materials incorporated into the products and, specifically, that no materials listed on the following website that originate from the associated countries are used in any materials supplied to SLSMC”</p> <p>https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods-print.</p>
3.	<p>Which form of entity accurately describes the entity’s structure?</p> <ul style="list-style-type: none">• Corporation
4.	<p>Which of the following accurately describes the entity’s activities? Select all that apply.</p> <ul style="list-style-type: none">• Importing into Canada goods produced outside Canada
5.	<p>Additional information on the entity’s structure, activities and supply chains.</p> <ul style="list-style-type: none">• For additional information on the Corporation, its activities, its Board of Directors and Officers, visit: https://greatlakes-seaway.com/en/about-us/slsmc-management/annual-corporate-summaries/• The Corporation is responsible for managing, among other things, federal government assets. While asset maintenance and renewal is typically performed by Canadian contractors, the Corporation has, from time to time, imported goods from suppliers in other countries (typically the United States), in connection with its asset management activities.
6.	<p>Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?</p>



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	<ul style="list-style-type: none">• Not at this time. The Corporation intends to adopt a supplier code of ethics in 2024 requiring suppliers to take measures to ensure no forced labour or child labour is used in the production of goods.
7.	Additional information on the entity's policies and due diligence processes in relation to forced labour and child labour. <ul style="list-style-type: none">• Not applicable
8.	Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? <ul style="list-style-type: none">• No.
9.	Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. <ul style="list-style-type: none">× Agriculture, forestry, fishing and hunting× Mining, quarrying, and oil and gas extraction× Utilities× Construction× Manufacturing× Wholesale trade× Retail trade× Transportation and warehousing× Information and cultural industries× Finance and insurance× Real estate and rental and leasing× Professional, scientific and technical services× Management of companies and enterprises× Administrative and support, waste management and remediation services× Educational services× Health care and social assistance× Arts, entertainment and recreation× Accommodation and food services× Other services (except public administration)× Public administration• <u>None of the above</u>
10.	Additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk.



Number	Question / Response
	<ul style="list-style-type: none"><li data-bbox="293 296 529 327">• Not applicable
11.	<p data-bbox="240 373 1516 447">Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?</p> <ul style="list-style-type: none"><li data-bbox="293 491 1328 522">• None required as no use of forced labour or child labour has been identified.
12.	<p data-bbox="240 571 1503 644">Additional information on any measures the entity has taken to remediate any forced labour or child labour.</p> <ul style="list-style-type: none"><li data-bbox="293 688 529 720">• Not applicable
13.	<p data-bbox="240 768 1433 877">Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?</p> <ul style="list-style-type: none"><li data-bbox="293 926 548 957">• Not at this time.
14.	<p data-bbox="240 1008 1511 1117">Additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.</p> <ul style="list-style-type: none"><li data-bbox="293 1161 529 1192">• Not applicable
15.	<p data-bbox="240 1243 1482 1274">Does the entity currently provide training to employees on forced labour and/or child labour?</p> <ul style="list-style-type: none"><li data-bbox="293 1318 548 1350">• Not at this time.
16.	<p data-bbox="240 1398 1479 1472">Additional information on the training the entity provides to employees on forced labour and child labour.</p> <ul style="list-style-type: none"><li data-bbox="293 1516 529 1547">• Not applicable
17.	<p data-bbox="240 1596 1450 1705">Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?</p> <ul style="list-style-type: none"><li data-bbox="293 1749 548 1780">• Not at this time.
18.	<p data-bbox="240 1831 1433 1904">Additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.</p>



Number	Question / Response
	<ul style="list-style-type: none"><li data-bbox="293 331 526 365">• Not applicable

ATTESTATION

In accordance with the requirements of the Act, I have reviewed the information contained in the report for the St. Lawrence Seaway Management Corporation. 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 and that the Board of Directors has approved the report. See attachment.



EXCERPT of MINUTES of a meeting of the Board of Directors of The St. Lawrence Seaway Management Corporation held at the Corporation's Head Office in Cornwall, Ontario, on Thursday, June 6, 2024.

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

Lori Kimball, CFO, noted that the Forced Labour and Child Labour Act, which was enacted in 2023 and came into force in January 2024, applies to the SLSMC. The steps taken by the Corporation to comply with the legislation were reviewed. One requirement under the Act is the issuance of an annual report to the Minister of Public Safety, which must be approved by the Board of Directors. The completed report for 2024 was included in the advance material for Board review and approval.

Upon motion duly made, seconded and unanimously carried, it was

RESOLVED that the 2024 annual report on Fighting Against Forced Labour and Child Labour in Supply Chains Act be approved and submitted to the Minister of Public Safety, as required under the Act.

CERTIFICATE

I, the undersigned, Pauline LeBlanc, Corporate Secretary of The St. Lawrence Seaway Management Corporation, certify that the preceding text is a true excerpt of minutes from the Lawrence Seaway Management Corporation Board of Directors meeting held on June 6, 2024.

July 11, 2024

Pauline LeBlanc, Corporate Secretary