



Corporation de Gestion
de la Voie Maritime
du Saint-Laurent

The St. Lawrence
Seaway Management
Corporation

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

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ANNUAL REPORT FOR 2025 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, 2025.
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: ✓ Has a place of business in Canada ✓ Does business in Canada ✓ Has assets in Canada Size related thresholds: ✓ 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



Annual Report

Number	Question / Response
1.	<p>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 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"> Developed and implemented 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” https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods-print.</p> <ul style="list-style-type: none"> The below clauses were incorporated into SLSMC Procurement Qualification process <p>“SUPPLIER CODE OF CONDUCT: No Child Labour No supplier may directly or indirectly use child labour in production of materials, performance of work or anywhere in their business, or knowingly purchase or use materials from contractors that use child labour in the performance or production of work. The term child labour refers to any products or services provided or offered by persons under the age of 18 years and that: (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada; (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them; (c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or (d) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted in Geneva on June 17, 1999. No Forced Labour No supplier may directly or indirectly use forced labour in production of materials or performance of work, or anywhere in their business, or knowingly purchase or use materials from contractors that use forced labour in the performance or production of work. The term forced labour refers to labour or services provided or offered to be provided by a person under circumstances that: (a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or (b) constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930. Consequences Breaches of this Supplier Code of Conduct are taken seriously. A failure to comply with this Supplier Code of Conduct may result in a supplier suspension from bidding on SLSMC contracts or termination of a contract, in whole or in part. The Supplier Code of Conduct is not to be read in lieu of but in addition to”</p>



Number	Question / Response
	<ul style="list-style-type: none">• Item 05b - Model Supplier Code of Conduct FINAL ENG <p>Previous Reports can be found:</p> <ul style="list-style-type: none">• Fighting Against Forced Labour and Child Labour in Supply Chains Act - Great Lakes St. Lawrence Seaway System
3.	Which form of entity accurately describes the entity's structure? <ul style="list-style-type: none">• Corporation
4.	Which of the following accurately describes the entity's activities? Select all that apply. <ul style="list-style-type: none">• Importing into Canada goods produced outside Canada
5.	Additional information on the entity's structure, activities and supply chains. <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.	Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? <ul style="list-style-type: none">• Yes. The Corporation published a supplier code of conduct 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



Number	Question / Response
	<ul style="list-style-type: none">✕ 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.	<p>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.</p> <ul style="list-style-type: none">• Not applicable
11.	<p>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">• None required as no use of forced labour or child labour has been identified.
12.	<p>Additional information on any measures the entity has taken to remediate any forced labour or child labour.</p> <ul style="list-style-type: none">• Not applicable
13.	<p>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">• Not at this time.
14.	<p>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">• Not applicable



Number	Question / Response
15.	Does the entity currently provide training to employees on forced labour and/or child labour? <ul style="list-style-type: none">• Not at this time.
16.	Additional information on the training the entity provides to employees on forced labour and child labour. <ul style="list-style-type: none">• Not applicable
17.	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? <ul style="list-style-type: none">• Not at this time.
18.	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. <ul style="list-style-type: none">• 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.

Signature

Full name:

Title:

Date:



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 5, 2025.

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

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

RESOLVED that the 2025 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 5, 2025.

June 19, 2025

Pauline LeBlanc, Corporate Secretary