

Year ending March 31, 2026

Manitoba Hydro Report on Supply Chain



This report describes actions that have been taken in support of federal legislation Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c.9)

The completion and filing of this report is undertaken on a voluntary basis and without prejudice to the reporting entities' rights to ascertain or challenge the applicability of the referenced legislation to Manitoba Hydro and/or its subsidiaries.

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Identification

Reporting entity: The Manitoba Hydro-Electric Board
(Manitoba Hydro)

Financial reporting year: April 1, 2025 - March 31, 2026 (2025/26)

Revised report: NO

Business number(s): Manitoba Hydro-Electric Board – 122063779
 Centra Gas Manitoba Inc. – 102445418
 Manitoba Hydro Utility Services Ltd. – 871636767
 Minell Pipelines Ltd. – 103704524
 5022649 Manitoba Ltd. – 861765030
 5900345 Manitoba Ltd. – 859085656

Joint report: YES

Manitoba Hydro submits this report for itself and on behalf of its subsidiaries Centra Gas Manitoba Inc., Manitoba Hydro Utility Services Ltd., Minell Pipelines Ltd., 5022649 Manitoba Ltd., and 5900345 Manitoba Ltd.

Reporting obligations other jurisdictions: NO

Categorization: Entity

Sector/industry: Utility

Location: Manitoba



Approval and Attestation

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chain Act (S.C. 2023, c.9) (the “Act”), and in particular section 11 thereof, I attest that

- (a) This report was approved by the Board of the Manitoba Hydro-Electric Board as a joint report of Manitoba Hydro, Centra Gas Manitoba Inc., Manitoba Hydro Utility Services Ltd., Minell Pipelines Ltd., 5022649 Manitoba Ltd., and 5900345 Manitoba Ltd. in accordance with section 11(4)(b)(ii) of the Act.
- (b) I have reviewed the information contained in this report for the entities listed above.
- (c) Based on my knowledge, and having exercised reasonable diligence, the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.
- (d) I have the authority to bind the entities listed above.

Full name: Donald Lorne Bjornson
Title: General Counsel and Corporate Secretary
Date: May 22, 2026

Steps taken to prevent and reduce risk

Actions this year centered on elevating internal awareness, consideration of internal mechanisms and identification of the departments that will be part of developing an organizational plan.

Requirement a)

Structure, activities and supply chains

Structure and Activities

Manitoba Hydro is a provincial Crown corporation and one of the largest integrated electricity and natural gas distribution utilities in Canada. We provide safe, reliable, and affordable service to over 632,000 electric and 300,000 natural gas customers. Manitoba Hydro operates on Treaty 1, 2, 3, 4 and 5 lands – the original territories of the Anishinaabe, Anishinew, Cree, Dakota, and Dene peoples and the National Homeland of the Red River Métis. We acknowledge these lands and pay our respects to ancestors of these territories. We are one of Manitoba's largest employers and are recognized as a top employer in Manitoba, a top employer for young people in Canada, and one of Canada's best diversity employers. We conduct our relationships with the utmost integrity and respect for our customers and community as we enhance our province's economic and social growth. We also trade electricity within four wholesale markets in the Midwestern United States and Canada. In fiscal year 2024-25, energy exports to these various markets totaled approximately \$860 million.

On the basis that the following Manitoba Hydro subsidiaries have at least \$20 million in assets and have generated at least \$40 million in revenue in one of the last two fiscal years, Manitoba Hydro is filing this report on behalf of itself and its subsidiaries Centra Gas Manitoba Inc., Manitoba Hydro Utility Services Ltd., Minell Pipelines Ltd., 5022649 Manitoba Ltd., and 5900345 Manitoba Ltd.

Manitoba Hydro Employees:

5,490

Manitoba Hydro Assets:

\$32.16 Billion

Data pertaining to employee numbers, assets, income, and other corporate highlights are based on the 2024-25 annual report.

Annual reports are available at: www.hydro.mb.ca/corporate/publications/



Supply Chain

Purchases: \$1.96 Billion (74% domestic)

Total active vendors: 5808 (89% domestic)

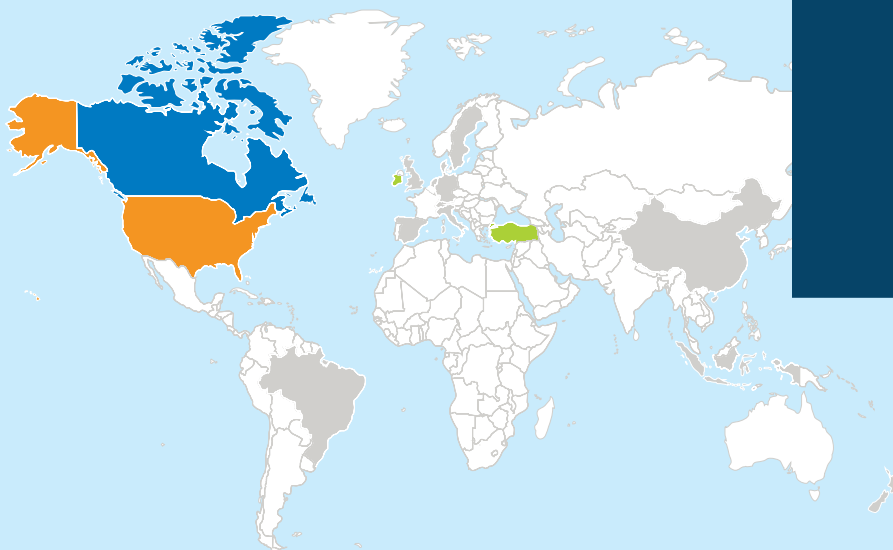
74% of Manitoba Hydro's annual purchases were from domestic vendors, with a significant portion of the annual spend focused on construction and infrastructure. Manitoba Hydro acknowledges that while the majority of our purchases are domestic (Tier I suppliers) there is additional risk of forced and child labour when the Tier I suppliers are distributors, importers or resellers, and goods originate outside of Canada. Additionally, Manitoba Hydro is aware of the risk of forced labour domestically within construction related services.

Amount Spent by Country

Country	Spend
Canada	\$1,442,054,062.36
USA	\$505,796,048.83
Turkey	\$5,993,597.01
Ireland	\$2,179,573.47
China	\$532,930.64
Brazil	\$258,209.26
Netherlands	\$224,454.91
Great Britain	\$137,795.11
Sweden	\$82,882.21
Indonesia	\$82,477.74
Spain	\$23,477.85
Denmark	\$23,127.15
Germany	\$19,455.36
New Zealand	\$12,061.43
Taiwan	\$7,874.28
Italy	\$6,993.17
Switzerland	\$4,349.77
Hong Kong	\$2,554.46
Grand Total	\$1,957,441,925.01

Suppliers by Country

Country	# Suppliers
Canada	5,160
USA	572
Great Britain	12
Sweden	8
Germany	8
China	5
Switzerland	4
Denmark	4
Brazil	3
Netherlands	3
Italy	3
New Zealand	3
Spain	3
Ireland	3
Australia	3
Mexico	2
Turkey	2
Chile	2
Hungary	1
India	1
Croatia	1
Hong Kong	1
Slovakia	1
Poland	1
Taiwan	1
Malta	1
Grand Total	5,808



Amount Spent by Country

- \$1.4B per country
- \$505M per country
- \$5.9M - \$2.1M per country
- <\$1M per country

Requirement b)

Policies and due diligence processes

Existing policies and processes

Manitoba Hydro's **Code of Conduct** sets out the fundamental values and expectations of our organization with respect to ethical business conduct. The Code highlights a number of guiding principles, including our commitments to integrity and accountability; safety; the environment; respect for others by supporting diversity and inclusion; a harassment-free workplace; legal and regulatory compliance; and fairness in human resource management and procurement. The guiding principles identified in our code of conduct are relevant to issues of forced labour and child labour. Manitoba Hydro's **Code of Conduct** is available here: <https://www.hydro.mb.ca/docs/corporate/code-of-conduct.pdf>

Manitoba Hydro is committed to the safety of our employees, customers, and the public. Policies and procedures strive to make the workplace safe for everyone. Manitoba Hydro is committed to the safety of our employees, customers, and the public. Policies and procedures strive to make the workplace safe for everyone. Manitoba Hydro has established a **Fatigue Management Protocol**, and the policy indicates that this protocol may be included as a contractor requirement. There is an internal guide for Managing Contractor Safety and accompanying two-hour eLearning course. Manitoba Hydro requires contractors working in Manitoba to be registered and carry insurance through the Worker's Compensation Board as a due diligence measure.

The **Vendor Performance Management Policy** and the Vendor **Bid Disqualification and Debarment Policy** provide an existing process to address and correct any form of supplier deficiency.

Manitoba Hydro's **Sustainability Report** shares with Manitobans how the Crown corporation delivers safe, reliable electricity and natural gas while promoting safety, advancing reconciliation, promoting community vibrancy and growth, and caring for our environment. Forced labour and child labour do not align with the principles and objectives to which Manitoba Hydro is committed. The 2024-25 **Sustainability Report** is available here: <https://www.hydro.mb.ca/corporate/publications/>

New Actions

In this reporting period:

- Building on the preliminary research and draft outline completed last year, discussions have been initiated to explore practical and scalable approaches for implementing a Supplier Code of Conduct across Manitoba Hydro's procurement and contracting activities.
- A decision has been made to incorporate a Supplier Code of Conduct clause into all future contracts, establishing a consistent contractual mechanism for application and enforcement.
- Development of an implementation and execution roadmap is underway to support rollout, including sequencing, internal roles and responsibilities, and integration with existing procurement and contract management processes.

Requirement c)

Forced labour and child labour risks

Risk analysis efforts remain in an early phase of development. Certain domestic construction and related service activities have been identified as presenting a risk for forced labour. There is also potential exposure to forced labour and child labour risks through Tier II suppliers.

New Actions

In this reporting period:

- In support of ongoing risk-analysis efforts, Manitoba Hydro has begun considering how forced labour and child labour risk factors may be integrated into future supplier expectations and contractual requirements.

Requirement d)

Remediation measures

As no issues were identified in this reporting period, no remediation efforts were taken. As noted in the response to **Requirement a)**, Manitoba Hydro has an existing **Vendor Performance Management** policy in place, with concrete process steps designed to address and correct issues.

Requirement e)

Remediation of loss of income

As no issues were identified in this reporting period, no remediation efforts were taken.



Requirement f) Training

Training for supply chain personnel related to forced labour and child labour is now in development.

New Actions

In this reporting period:

- Manitoba Hydro initiated the development of training materials for supply chain and procurement personnel. The training is intended to form part of annual review activities and the onboarding of new employees, with a focus on raising awareness of forced labour and child labour risks and applicable legislative requirements.

Requirement g) Assessing effectiveness

Developing a mechanism to assess the effectiveness of actions related to forced and child labour in the supply chain was not part of this year's planned activities. This work is anticipated to be considered in future phases as the program continues to evolve.

