

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, and respect for others by supporting diversity and inclusion, a harassment-free workplace, and 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 **Environment, Social, and Governance (ESG) Report** reiterates our commitment to lawful, responsible, and ethical conduct. Forced labour and child labour do not align with the principles and objectives to which Manitoba Hydro is committed. The annual **Environment, Social, and Governance (ESG) Report** is available here: <https://www.hydro.mb.ca/corporate/publications/>

New Actions

In this reporting period:

- Preliminary, exploratory work has been initiated to support the development of a Supplier Code of Conduct for Manitoba Hydro. This work has included a review of existing literature and best practices, as well as analysis of information and recommendations provided by external consultants. It has also involved an examination of supplier codes of conduct implemented by peer organizations within the utility sector and the broader public sector.
- As a result of this initial research, a draft outline for a Manitoba Hydro Supplier Code of Conduct has been created to guide future development and stakeholder engagement efforts.

Code of Conduct:

[hydro.mb.ca/docs/corporate/code-of-conduct.pdf](https://www.hydro.mb.ca/docs/corporate/code-of-conduct.pdf)

Environment, Social, and Governance (ESG) Report:

[hydro.mb.ca/docs/corporate/code-of-conduct.pdf](https://www.hydro.mb.ca/docs/corporate/code-of-conduct.pdf)

Requirement c)

Forced labour and child labour risks

Risk analysis research is still at the developmental stage. Domestic construction and related services are at risk for forced labour. The potential for forced labour and child labour exists through Tier II suppliers.

New Actions

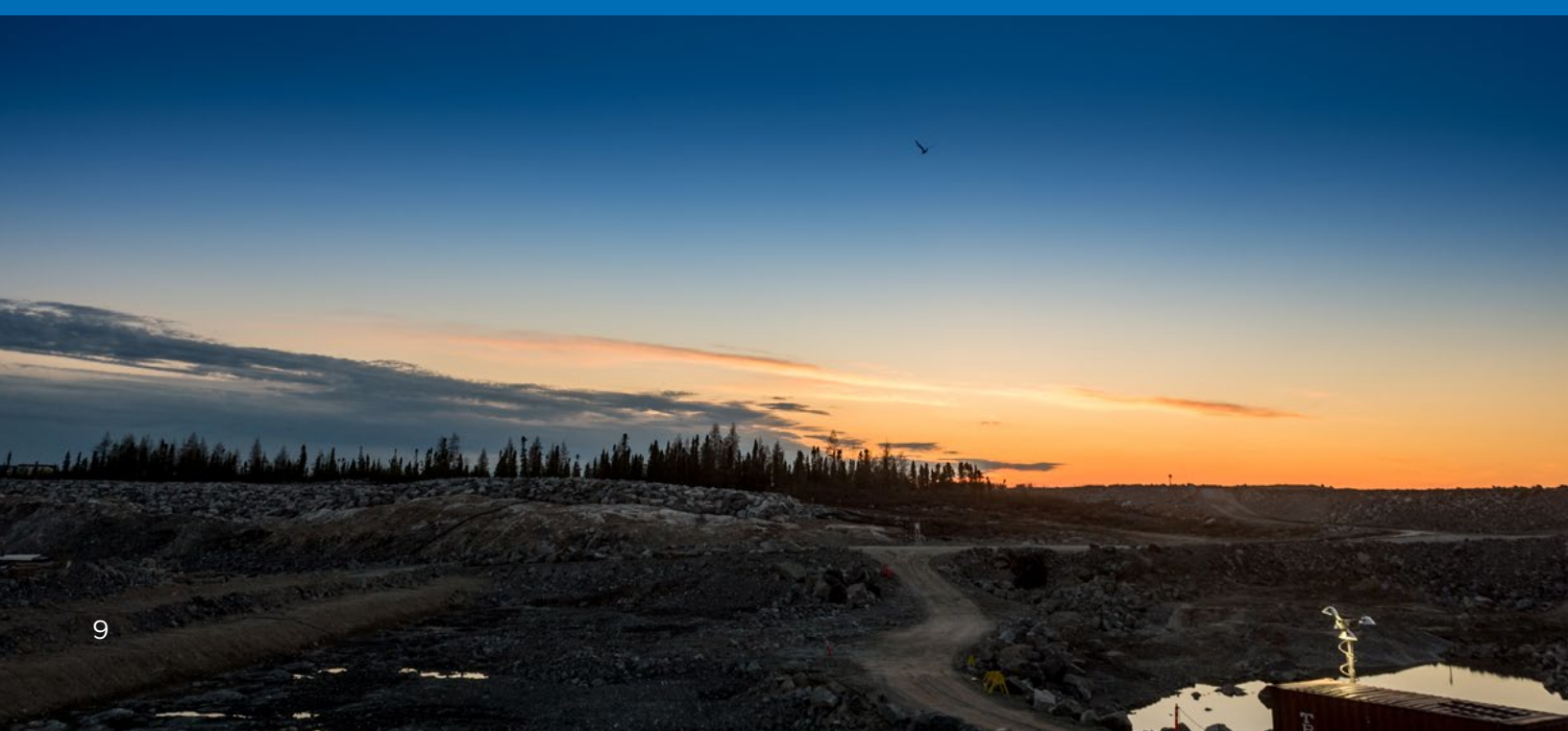
In this reporting period:

- Supply Chain senior leadership attended an Electricity Canada meeting focused on forced labour in supply chains, gaining insight into emerging regulatory expectations, industry challenges, and mitigation strategies.
- Leadership participated in group discussions with peer utilities to further explore the information shared and to exchange perspectives on industry responses and best practices, supporting Manitoba Hydro's efforts to strengthen responsible supply chain practices.

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

No additional training of supply chain personnel regarding forced labour and child labour occurred during this reporting period.

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.

