



2023 BRUCE POWER

Modern Slavery Report

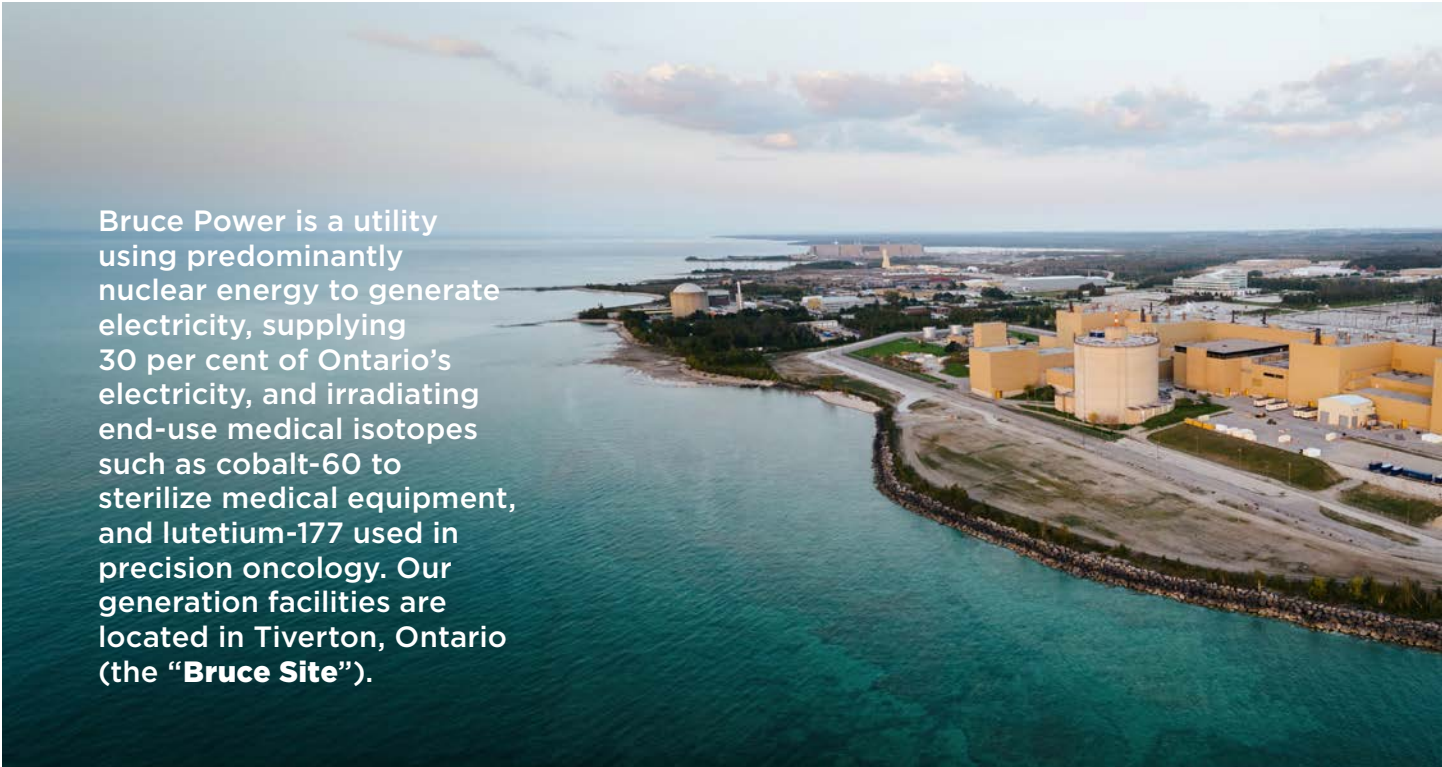
Contents

Our Business, Structure, and Supply Chain	4
Our Policies and Due Diligence Processes	6
Modern Slavery Risks	7
Actions to Remediate Modern Slavery	9
Training and Awareness	10
Assessing our Effectiveness	11
Report Approval and Attestation	12

Our Business, Structure, and Supply Chain

Our Business Activities and Corporate Structure

Bruce Power is a limited partnership established under the laws of the Province of Ontario. The sole general partner of Bruce Power is Bruce Power Inc., a corporation incorporated under the laws of the Province of Ontario. Bruce Power was registered as a limited partnership with the Ministry of Consumer and Commercial Relations on July 10, 2000. Bruce Power Inc. was incorporated on April 27, 2000.



Bruce Power is a utility using predominantly nuclear energy to generate electricity, supplying 30 per cent of Ontario's electricity, and irradiating end-use medical isotopes such as cobalt-60 to sterilize medical equipment, and lutetium-177 used in precision oncology. Our generation facilities are located in Tiverton, Ontario (the “**Bruce Site**”).

Our Supply Chain

Bruce Power’s Supply Chain Division sources and procures all goods used by Bruce Power to support operations, maintenance, and projects at the Bruce Site. Bruce Power does not process raw materials or manufacture goods.

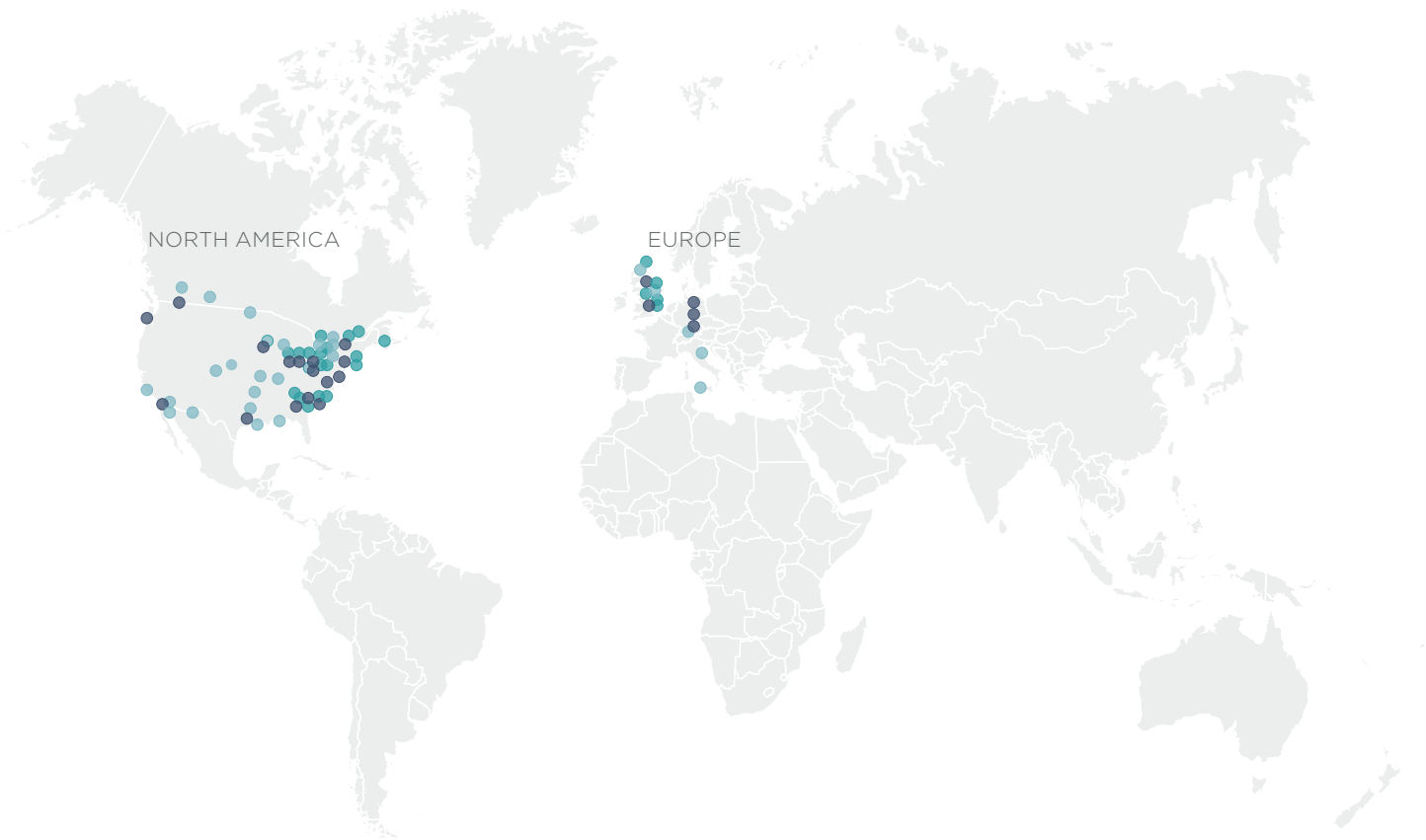
Our team of supply chain professionals ensures all procurements comply with Bruce Power policies including the Bruce Power Supplier Code of Conduct, procedures, quality assurance requirements, as well as applicable licensing requirements and Canadian law (the “Requirements”).

Focus on Localization

Bruce Power’s procurement strategy ensures most of our goods are procured from Canada-based Tier-1 Suppliers.

	Goods Spend (\$M)	Total Goods Spend (\$M)	% Spend
Ontario	\$315.17	\$505.34	62%
Canada	\$417.28	\$505.34	83%

Bruce Power’s 2023 goods spend represents 21% of Bruce Power’s total 2023 expenditure.



Bruce Power’s 2023 global procurement footprint.

Our Policies and Due Diligence Processes

Bruce Power's business is the production of electricity for the Province of Ontario and the supply of medical isotopes. We rely on our suppliers and their market expertise and ethical business practices to ensure all raw materials and components are sourced from reputable sub-suppliers that meet or exceed our Requirements.

Bruce Power uses an online supplier prequalification platform – ISNetworld (ISN) – to pre-qualify our suppliers onto our approved suppliers list by collecting, reviewing, and verifying information such as health, safety, and environmental programs, insurance, workers' compensation, and safety statistics to ensure the supplier can meet or exceed our Requirements and is otherwise capable to perform the work.

Suppliers on the approved suppliers list may be invited to participate in Bruce Power procurements, which are subject to rigorous evaluation processes. Upon selection, Bruce Power suppliers enter binding contracts which require compliance with the Requirements, including Section 3.0 of the Supplier Code of Conduct which requires suppliers to conduct business in accordance with the principles of human rights and diversity, and ensure no forced and child labour is condoned, facilitated, or used in their workplaces. Suppliers are required by contract to flow through their contractual obligations with Bruce Power to their sub-suppliers.

Suppliers are strongly encouraged to report violations of the Bruce Power Supplier Code of Conduct by discussing with their Bruce Power contract manager or any other member of the Bruce Power management team, or through our confidential, independent third-party service provider. All reports are taken seriously and must be investigated and addressed appropriately in accordance with Bruce Power policies, procedures, and all applicable law and regulation. A failure to comply with the Bruce Power Supplier Code of Conduct may result in the suspension or termination, in whole or in part, of the supplier's agreement(s) with Bruce Power and may include removal from the approved suppliers list.

Modern Slavery Risks

Methodology

In 2023, Bruce Power conducted its first assessment focused on risk exposure to forced and child labour in our supply chain. The assessment focused on Tier 1 Suppliers, which are suppliers with whom Bruce Power has a direct contractual relationship.

The assessment undertaken to compile this report was completed using the following methodologies:

1. Review of the countries of origin of all Tier 1 Suppliers from whom we sourced goods in 2023 to identify conflict-affected and high-risk regions¹;
2. Review of all goods procured in 2023 which comprise, in part, minerals available from conflict-affected and high-risk regions, which are known to rely on forced and child labour: Tin, Gold, Tungsten, Tantalum, commonly referred to as 3TG², and Cobalt³ (together, “**Conflict Minerals**”); and
3. Review of voluntary Tier 1 Supplier self-reporting provided to date at the request of Bruce Power regarding their risk of exposure to forced and child labour⁴.

¹ <https://www.cfr.org/global-conflict-tracker>

² Conflict Minerals Regulation: The regulation explained (europa.eu).

³ Cobalt (responsiblemineralsinitiative.org). The Democratic Republic of the Congo (DRC) is the largest producer of Cobalt and contains more than 50% of global reserves. The DRC is recognized as a conflict region.

⁴ Supplier feedback was voluntary and provided insight as to the status of supplier comprehension and preparation for the 2023 reporting requirements. Voluntary supplier feedback represents approximately 40% of Bruce Power's total 2023 goods spend.



Risks

Bruce Power procures goods through its Tier 1 Suppliers. Accordingly, our risk exposure to forced and child labour is through our Tier 1 Suppliers, and their sub-suppliers and extended supply chains.

Our risk evaluation yielded the following results:

- a. **2,389,556** goods were procured.
- b. **62,473** goods were procured which contain one or more Conflict Minerals, representing **2.6%** of total goods procured.
- c. Bruce Power did not procure any parts from Tier 1 Suppliers located in conflict or high-risk regions.

Although Bruce Power does procure goods which may contain one or more Conflict Minerals, based on the results of our risk assessment, and Tier 1 Supplier feedback received to date, Bruce Power has no evidence to indicate the actual presence of forced or child labour in our supply chain.

In 2024, we will continue to assess and strengthen our due diligence process to ensure we have appropriate measures in place to assess the risk of the presence of forced and child labour in our supply chain, including in respect of Conflict Minerals.

A Note on Our Fuel

Uranium is a key component of the fuel used by Bruce Power to produce electricity. While it is not identified as a Conflict Mineral, it is known to be available for mining in conflict regions or high-risk regions⁵. Bruce Power purchases its uranium from a single supplier. Under the terms of the agreement, our fuel supplier can only source fuel from approved countries of origin: Canada, Australia, the United States, and Kazakhstan based on known environmental, social, and regulatory standards.

⁵ [World Uranium Mining - World Nuclear Association \(world-nuclear.org\)](https://world-nuclear.org)



Actions to Remediate Modern Slavery

In assessing the risks of forced and child labour in our supply chain, we have focused principally on our Tier 1 Suppliers with whom we have direct contractual relationships. Based on our existing policies and practices, we have not identified any evidence of forced and child labour in our supply chain. Accordingly, we have not implemented any targeted measures to address forced and child labour.

We remain committed to ensuring we do not have forced and child labour in our supply chain, and we will continue to engage with our Tier 1 Suppliers to enhance our due diligence processes to identify and mitigate risks to the extent reasonably practicable.



Training and Awareness

Beginning in 2024, our contract manager training is being updated to reinforce the importance of the Act and Bruce Power's role in limiting the presence of forced and child labour in our supply chain. The Act and the substance of this report have been rolled out to our Supply Chain Division. As part Bruce Power's commitment to continuous improvement, we will build upon and improve our training to continue to take strong action against forced and child labour.



Assessing our Effectiveness

In 2023, we focused on understanding our existing procurement practices and identifying risks through the lens of forced and child labour. As we look forward into 2024, we will consult with industry peers and our Tier 1 Suppliers to improve our diligence process and risk assessment to continue to ensure we have taken all steps reasonably practicable to eliminate the risk of forced and child labour from our supply chain.

Additionally, Bruce Power has undertaken a review of its supplier selection process to incorporate additional oversight measures to further reduce exposure to the risk of forced and child labour in our supply chain, ensure all suppliers internalize the importance of ethical business practices, and take seriously our collective obligation to fight against forced and child labour in all forms throughout the global supply chain.



Report Approval and Attestation

Bruce Power's Board of Directors supports the company's approach to this issue and signifies such support by the following approval and attestation:

In my capacity as the Chairman of the Board of Directors of Bruce Power Inc., and not in my personal capacity, and on behalf of the Board of Directors of Bruce Power Inc., in accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. 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.

Bob Aziz, Chair





[brucepower.com](https://www.brucepower.com)

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