



2024 BRUCE POWER

Modern Slavery Report



Bruce Power imports into Canada goods produced outside of Canada and is subject to Part 2 of the Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the “**Act**”).

This 2024 report is made pursuant to the Act and is approved for issuance by the Bruce Power Board of Directors on April 24, 2025.

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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 percent 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 in Tiverton, Ontario (the "**Bruce Site**").

Our Supply Chain

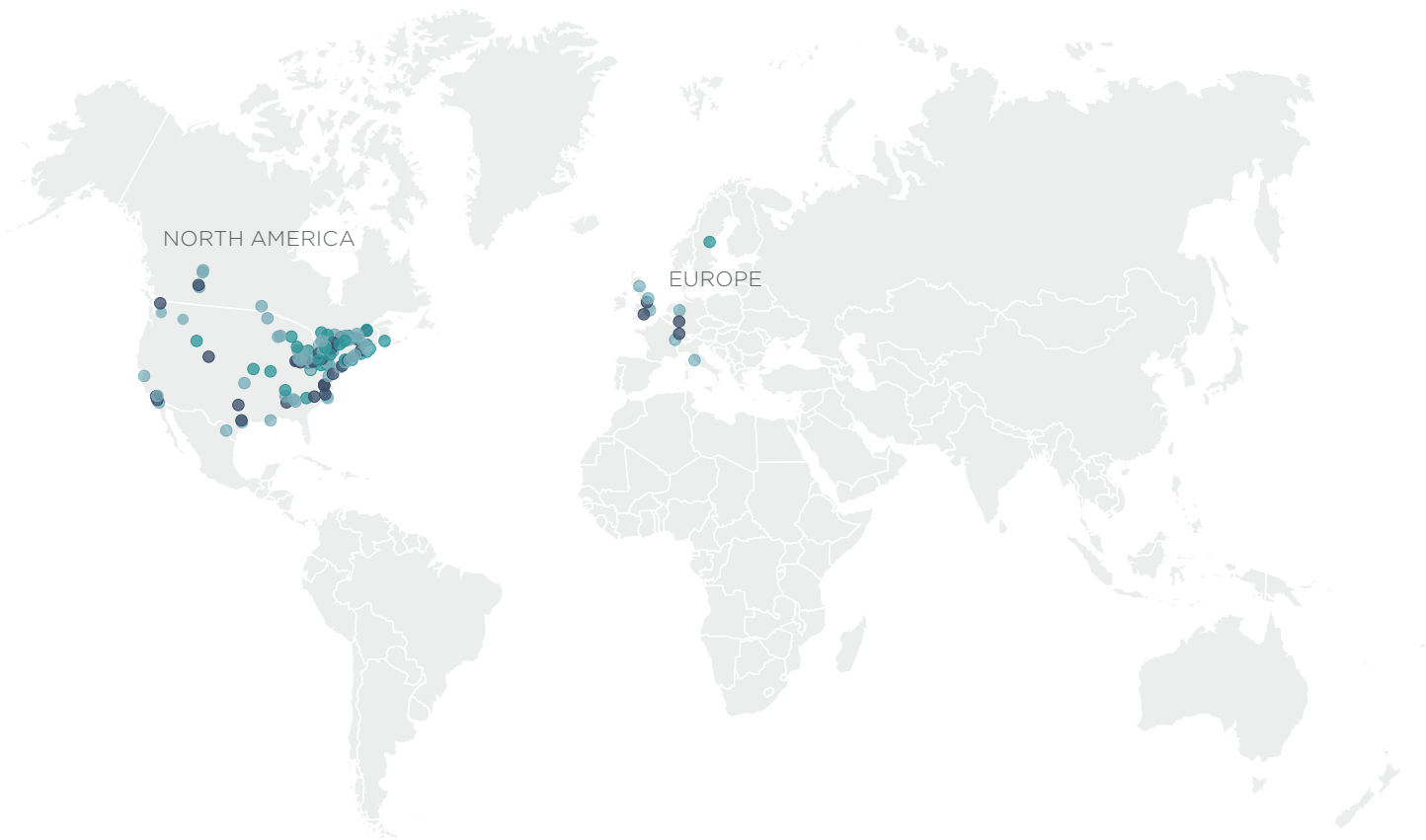
Bruce Power’s Supply Chain Division sources and procures all goods used by Bruce Power to support operations, maintenance, and projects at the Bruce Site. Bruce Power does not process raw materials or manufacture goods.

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 that most of our goods are procured from Canada based Tier-1 suppliers with the majority in Ontario.

	Goods Spend (\$M)	Total Goods Spend (\$M)	% Spend
Ontario	\$319.1	\$500.1	64%
Canada	\$388.0	\$500.1	83%



Bruce Power’s 2024 global procurement footprint.

Our Policies and Due Diligence Processes

Bruce Power's business is the production of electricity for the Province of Ontario and irradiation 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.

In 2024, Bruce Power undertook a comprehensive review of its due diligence processes to enhance our knowledge of the risk of exposure to forced and child labour within our supply chain. As a result, Bruce Power took the following actions:

1. Revised our governance program, including our internal compliance mechanisms, to incorporate the principles of the Act;
2. Updated our procurement evaluation processes to integrate human rights principles. Our supplier onboarding and evaluation process considers existing policies and procedures in this regard;

3. Updated our Supplier Performance Management Policy to further emphasize Bruce Power's expectations that suppliers take reasonable and appropriate steps to mitigate the risk of exposure to forced and child labour within their supply chains; and
4. Enhanced the supplier onboarding process to require all new and prospective suppliers to confirm whether their organizations have a robust policy to identify and address the risk of exposure to forced and child labour within their supply chains.

Bruce Power continues to use 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. These requirements are highlighted and reinforced in Bruce Power's Supplier Performance Management Policy.

Suppliers are strongly encouraged to report potential concerns or 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

Bruce Power is a learning organization; in 2024 we applied lessons learned from the 2023 Modern Slavery Report to further enhance the due diligence processes used to assess the risk of exposure to forced and child labour in our supply chain. Bruce Power introduced an enhanced risk assessment (the “**Enhanced Assessment**”) to 112¹ suppliers, selected based on Bruce Power’s spend with each supplier. The Enhanced Assessment asked suppliers to provide the following information:

1. Frequency with which supplier performed a risk assessment of its exposure to forced and child labour in its supply chain;
2. Whether the risk of exposure to forced or child labour has been identified;
3. Presence of key performance indicators to track the risk of exposure to forced and child labour in its supply chain;
4. Level of due diligence performed (e.g. Audits) to date;
5. Geographical information to identify areas at greater risk;
6. Presence of confidential employee reporting options; and
7. Partnerships with local organizations to promote labour rights.

Additionally, Bruce Power reviewed all goods procured in 2024 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**”).

¹ Participation in the risk assessment was entirely voluntary.

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.

Risks

Bruce Power reviewed the results of the supplier responses to the Enhanced Assessment and classified each supplier as high, moderate, or low risk. No suppliers were classified as high risk and Bruce Power did not observe any material change in its risk of exposure to forced and child labour as compared to 2023.

Regarding Conflict Minerals, our risk evaluation yielded the following results:

- a. 1,765,731 were procured.
- b. 45,914 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 Enhanced Assessment, Bruce Power continues to have no evidence to indicate the actual presence of forced or child labour in our supply chain.

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 regions⁴. 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.



⁴ World Uranium Mining - World Nuclear Association ([world-nuclear.org](https://www.world-nuclear.org))

Actions to Remediate Modern Slavery


Based on our improved due diligence process and Enhanced Assessment, Bruce Power has 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 Suppliers to enhance our due diligence processes to identify and mitigate risks to the extent reasonably practicable.



Training and Awareness

In 2024, Bruce Power's Contract Manager and Supply Chain Division training was updated to support increased awareness of the risks of exposure to forced and child labour in our supply chain by clearly explaining the requirements of the Act and Bruce Power's expectation that procurement decisions be made in accordance with the principles of human rights and diversity, and reinforcing the importance of taking appropriate steps to ensure no forced and child labour is condoned, facilitated, or used.



Bruce Power will evaluate the effectiveness of this training throughout 2025. As part of 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 2024, Bruce Power implemented measures to enhance our internal diligence processes and performed further engagement with our suppliers. As Bruce Power looks forward into 2025, we will take further reasonably practical steps to assess and improve our processes and mechanisms to evaluate and increase supplier engagement to minimize the risk of exposure to forced and child labour in our 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





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