

# Report on Fighting Against Forced Labour & Child Labour in Supply Chains

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# About The Report

At Enwave Energy Corporation (“Enwave”), we are unwavering in our commitment to ethical business practices and social responsibility. As an organization deeply rooted in the energy industry, we understand the importance of not only providing sustainable and reliable energy solutions but also ensuring that our operations adhere to the highest standards of ethical conduct.

This report (“Report”) constitutes the first report prepared by Enwave pursuant to Canada’s new *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and sets out the steps taken by Enwave to reduce the risks of child labour and forced labour in our organization and in our supply chain for the financial year ended December 31, 2023. In this Report, unless otherwise stated, references to “Enwave”, “we”, “us”, “our” and similar expressions are references to Enwave. Monetary amounts in this Report are expressed in Canadian dollars, unless otherwise stated.



# Our Company

## OUR STRUCTURE

Enwave was originally incorporated by statute in 1969 as a not-for-profit corporation for the purpose of bringing together the heating operations of three Toronto hospitals. In 1999, the Ontario Legislature enacted the *Toronto District Heating Corporation Act, 1998*, which continued Enwave as a for-profit corporation incorporated under the *Business Corporations Act* (Ontario) and granted to Enwave certain rights and privileges relating to its business.

Enwave has several subsidiaries, all of which are governed by the laws of Ontario, and none of which are themselves reporting entities for purposes of the Act. Enwave is headquartered in Toronto.



## OUR BUSINESS

Enwave is a vertically integrated energy provider that offers deep district energy experience with best-in-class operations, construction, development, maintenance, lifecycle asset management and financing. Enwave plays an integral role in Canada, weaving itself into the communities it serves across Ontario and Prince Edward Island. Enwave has evolved over time from its origins as a City of Toronto-owned steam producer serving Toronto hospitals in 1969 to a fully integrated, sustainable thermal energy solutions provider owned by Ontario Teachers' Pension Plan and IFM Investors. Enwave now serves thermal energy to more than 87 million square feet in Toronto alone and through its subsidiaries it owns and operates energy systems in Markham, London, Windsor, and Charlottetown (with new systems currently under development in Etobicoke and Mississauga).



# Our Supply Chain

District energy systems rely on critical inputs such as natural gas, oil, wood, water electricity and chemicals for their operations and use third party suppliers to provide these commodities, as well as professional services, equipment and business support. Enwave collaborates with a diverse network of suppliers, carefully selected to offer a range of competitive and accessible goods and services. To manage supply chain risk, Enwave sources materials responsibly, standardizes processes across our supply chain and does business with suppliers that share our commitment to responsible corporate standards.

In 2023, Enwave engaged approximately 270 suppliers, all of whom were based in Canada and the United States of America, with exception of two suppliers being based in Belgium and Sweden- all countries with low prevalence of modern slavery according to the Walk Free Global Slavery Index ([Global Slavery Index | Walk Free](#)). Nevertheless, Enwave recognizes the importance of supply chain due diligenceto ensure that risks of forced labour and/or child labour within its supply chain are properly managed.

A high-level breakdown of Enwave’s direct suppliers in 2023 is set as below:

Description	2023 Spend (%)	Primary Products	Primary Countries	% Split from Total Qty of Suppliers in 2023
<b>Commodities</b>				
Natural Gas	21%	Gas	Canada	2%
Oil	1%	Oil	Canada	1%
Wood	4%	Wood	Canada	1%
Water	6%	Water	Canada	1%
Electricity	12%	Electricity	Canada	1%
Chemicals	1%	Chemicals	Canada	3%
<b>Business Support Services</b>	14%	Maintenance services, IT, general and administrative services	Canada, US	34%
<b>Professional Services and Equipment</b>	41%	Construction services, consultants, operations, major equipment including electrical and mechanical equipment	Canada, US	59%



# Steps Taken to Reduce Risks

Enwave acknowledges that its business has a duty to comply with and respect the Act. Enwave is committed to operating ethically and legally, partnering with suppliers that are aligned to the values of the company.

In general terms, Enwave took the following steps during its 2023 financial year to prevent and reduce the risk of forced labour or child labour in its business and supply chains:

- Conducted a high-level analysis of our activities and our supply chain to assess the risks posed
- Re-enforced and updated governance and policies addressing ethics and forced labour or child labour risk in our supply chain
- Maintained our anonymous reporting hotline, allowing anyone to report suspected unethical, illegal or unsafe behavior in our operations or by our suppliers
- Enhanced our supplier due diligence process

## OUR POLICIES & GOVERNANCE

### A) Code of Conduct and Business Ethics

Internally, Enwave has adopted a Code of Business Conduct and Ethics (“Code of Conduct”), which has been endorsed by Enwave’s Board of Directors, and sets out the commitment that all of our directors, officers, and employees must make as part of the Enwave team. It has always been and remains Enwave’s policy that all activities should be conducted with the utmost honesty and integrity and in full compliance with all legal and regulatory requirements. The Code of Conduct sets forth basic principles and standards that each Enwave team member must adhere to. The full Code of Conduct can be found on Enwave’s website here: [Code of Conduct - Enwave Energy Corporation](#).

The Code of Conduct includes a reporting hotline, managed by an independent third party, which allows anyone to call anonymously to report, in English and other languages, suspected violation of the Code of Conduct, including unethical, illegal or unsafe behavior.



Upon joining Enwave, each team member is provided with a copy of the Code of Conduct and is required to sign an acknowledgement of its contents. On an annual basis, each Enwave team member is also required to re-certify compliance with the Code of Conduct as a condition of continued directorship or employment.

## **B) Supply Chain Management Policy**

Enwave has established a Supply Chain Management Policy (“SCM Policy”), which sets forth the principles and requirements for sourcing and procurement of goods and services at Enwave. It is intended that sourcing and procurement is to be performed in a consistent, controlled, and ethical manner in accordance with sound business practices. The SCM Policy establishes rules and guidelines for sourcing goods and services to ensure, among other things, that the Company meets its legal and ethical obligations in the acquisition of goods and services. The SCM Policy is read in conjunction with the Code of Conduct.

## **C) Supplier Standards of Conduct**

Enwave believes that it has both an ethical and a business imperative to be a responsible corporate citizen. This includes establishing a set of minimum standards of conduct for its suppliers of goods and services. Enwave wants to do business with suppliers that share its commitment to corporate responsibility. Building off the Ten Principles of the UN Global Compact ([The Ten Principles | UN Global Compact](#)), Enwave has established its Supplier Standards of Conduct (“Supplier Standards of Conduct”), covering topics such as safety culture, human rights, labour standards, the environment and business ethics. The Supplier Standards of Conduct explicitly require that suppliers support and respect the protection of internally proclaimed human rights, and not engage directly or indirectly in any form of forced or compulsory labour or child labour practices.

More information about Enwave’s approach to supply chain responsibility is available on Enwave’s website at [Supplier Standards of Conduct - Enwave Energy Corporation](#). Each of Enwave’s suppliers of goods and services are required to acknowledge the Supplier Standards of Conduct upon becoming a supplier to Enwave and High Risk Contractors (as defined under *Our Due Diligence Process* below) are required to re-confirm their compliance with the Supplier Standards of Conduct on an annual basis.



# OUR DUE DILIGENCE PROCESS

In 2023, to improve its third-party risk management for High Risk Contractors (as defined below), Enwave implemented a Supplier due diligence platform, known as ISN ([www.isnetworld.com](http://www.isnetworld.com)). Enwave uses this platform to screen suppliers for various third-party risks such as disclosed health and safety violations by such supplier, if such supplier is part of any sanctioned countries list, compliance by such supplier with workers compensation obligations, and creditworthiness of such supplier (if available). Enwave has customized ISN to incorporate confirmation of its Supplier's Standards of Conduct by its High Risk Contractors on an annual basis. Enwave also requires all of its Low Risk Contractors (as defined below) who do not participate in the ISN platform to re-confirm their compliance with the Supplier Standards of Conduct on an annual basis. In 2023, Enwave identified 157 High Risk Contractors.

Step 1: Risk Level Identification	
High Risk Contractor (ISN Required)	Low Risk Contractor (ISN Not Required)
<p>A contractor who has access to site operations where such access, and the nature of the work performed on site, create the reasonable potential for harm to the employees of the company, others in the area, company assets or the environment.</p> <p><b>Example Contractor work types to be included in this category (including, but not limited to):</b></p> <ul style="list-style-type: none"> <li>• Ammonia System Maintenance &amp; Installation</li> <li>• Boiler repair &amp; maintenance</li> <li>• Chemical &amp; process cleaning</li> <li>• Demolition contractor</li> <li>• Electricians and Instrumentation technician</li> <li>• Engineering Construction</li> <li>• Environmental investigation, remediation, monitoring activities</li> <li>• Equipment and process maintenance, installation and/or inspection</li> <li>• Excavation</li> <li>• Facilities maintenance</li> <li>• Fire suppression services</li> <li>• Hazardous waste handling and/or transport</li> <li>• Heavy equipment operators</li> <li>• High Pressure Piping Maintenance and Installation</li> <li>• Hot Work (Welding, Brazing, Grinding)</li> <li>• Maintenance, construction, and demolition contractors</li> <li>• On-site sampling/gauging activities</li> <li>• Roofing</li> <li>• Steam Systems Maintenance and Installation</li> </ul>	<p>A contractor whose access to operations and the nature of the work performed on site does not create a reasonable potential for harm to the employees of the company, others in the area, company assets or the environment.</p> <p><b>Example Contractor work types to be included in this category (including, but not limited to):</b></p> <ul style="list-style-type: none"> <li>• Landscaping services</li> <li>• Janitorial services</li> <li>• Office support &amp; repairs (computers/printers)</li> <li>• Consultants</li> <li>• Local municipal utilities</li> </ul>
<p><b>Step 2: If Low Risk, answer the below questions.</b></p> <ol style="list-style-type: none"> <li>1. Will the contractors work require a permit, be performed at heights, in a process area or involve a critical safety process?</li> <li>2. Could the contractors work harm our environment or cause property damage?</li> <li>3. Could the contractors work cause harm to themselves, our employees, or our company's reputation?</li> <li>4. Will the contractor be working with compressed gasses, hazardous materials, process materials or generate hazardous waste?</li> <li>5. Will the contractor require access to a company network, access sensitive data, or work on connected production equipment?</li> </ol>	
<p><b>If the answer is 'Yes' to any of the above, the contractor is considered High Risk <u>ISN Required</u></b></p>	



# Assessing & Managing Risks

In 2023, Enwave conducted a high-level analysis of our activities and our supply chain to assess the forced labour or child labour risks posed. Based on this assessment, we determined that the overall risk of forced labour or child labour occurring within Enwave's activities and supply chain is low. This determination was made based on the following:

## **RISK WITHIN OUR OPERATIONS**

Given that our workforce is largely comprised of specialized team members in our plants and office workers, we consider there is a low risk of forced labour or child labour in our direct operations. In addition, the entirety of Enwave's workforce is employed or contracted in Canada, and the vast majority are employed or contracted directly by Enwave.

In addition, Enwave's operations consist mainly of the provision of a service to its customers, as opposed to the sale or delivery of goods.

## **RISK WITHIN OUR SUPPLY CHAIN**

Enwave does very little importing of goods outside of Canada and its suppliers are almost exclusively based in Canada or the United States – both of which are countries with low prevalence of modern slavery according to the Walk Free Global Slavery Index ([Global Slavery Index | Walk Free](#)). Based on this, Enwave has determined that there is low risk of forced labour or child labour in its supply chain.

While no current significant risks were uncovered in the above-noted risk assessment, Enwave recognizes that instances of forced labour or child labour can still occur within its activities and supply chain. In this regard, in 2023 Enwave undertook a review and enhancement of its policies and supply chain governance as they relate to identifying, addressing, and prohibiting the use of forced labour and child labour within its supply chain. Enwave also intends to continually assess the risks of forced labour or child labour in its activities and supply chain and review its internal policies and practices to ensure compliance with applicable laws and regulations and will take prompt action of a remedy if it becomes aware of any violations of legal obligations. Enwave will continue to maintain its reporting hotline, allowing anyone to report suspected violation of the Code of Conduct, including unethical, illegal or unsafe behavior in its operations or by its suppliers.



## REMEDIATION MEASURES

Enwave is not currently aware of any instances of forced labour or child labour in its activities or supply chain in 2023. As such, it has not had to take any measures to remediate any forced labour or child labour or to remediate any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities or supply chains.

## TRAINING

Given the risk assessment undertaken by Enwave, it does not provide training to employees on forced labour and child labour, however, Enwave does require all of its team members to annually re-certify compliance with the Enwave Code of Conduct as a condition of continued directorship or employment. The Code of Conduct re-iterates that all of Enwave activities should be conducted with the utmost honesty and integrity and in full compliance with all legal and regulatory requirements. While the Code of Conduct does not directly address issues of modern slavery, it affirms our commitment to ensuring everyone working on behalf of Enwave adheres to the highest ethical standards.

## ASSESSING EFFECTIVENESS

Enwave is committed to addressing the risks of forced labour and child labour in our business and supply chains. As described in this Report, Enwave has introduced several measures to prevent and reduce these risks. However, to date, Enwave has not yet taken any actions to assess the effectiveness of the policies and procedures made.



# Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the boards of directors of Enwave and its parent company, Enwave Canada Investment Holdings Inc (“Enwave Parent”).

In accordance with the requirements of the Act, and in particular section 11 thereof, we, the undersigned, attest that we have reviewed the information contained in this Report for the entity listed above. Based on our knowledge, and having exercised reasonable diligence, we attest that 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.

I make the above attestation in my capacity as a director of the board of directors of Enwave for and on behalf of the board of Enwave



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Carlyle Coutinho  
Chief Executive Officer and Director  
May 30, 2024

I have the authority to bind Enwave.

I make the above attestation in my capacity as a director of the board of directors of Enwave Parent for and on behalf of the board of Enwave Parent.



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Michael Bernstein  
Independent Chair  
May 30, 2024

I have the authority to bind Enwave Parent.