



***Fighting Against Forced Labour and Child Labour in Supply
Chains Act***

Report for year 2024-25

May 31st 2025

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Background

The Federal Bridge Corporation Limited (FBCL or Corporation) enables bridge crossings in excess of 9 million motor vehicles annually across FBCL's ownership portfolio and employs approximately 110 individuals for both the Blue Water Bridge and FBCL's subsidiary, the Seaway International Bridge Corporation Ltd. (SIBC). In delivering its mandate, the Corporation is committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion.

The FBCL headquarters are in Ottawa and it owns international bridge crossings and associated structures in Ontario in the following cities: Sault Ste. Marie, Point Edward, Lansdowne and Cornwall. The FBCL's mandate is to provide the highest level of stewardship so that its international bridge crossings and associated structures are safe and efficient for users.

Commitment

The FBCL is committed to preventing and mitigating the risk of forced or child labour in its procurement of goods in Canada. The FBCL wants to contribute to the implementation of Canada's international commitment to fight against forced labour and child labour.

Scope

This report includes data from both the FBCL and its wholly owned subsidiary, SIBC. Both entities are reporting for the period of April 1, 2024, to March 31, 2025.

Obligations

Per section 6 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("the Act"), FBCL must report annually to the Minister of Public Safety on the steps it has taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods produced, purchased or distributed by the government institution.

Contacting The Federal Bridge Corporation Limited

You may communicate with us with feedback about this report. Feedback may be submitted anonymously if preferred. Your feedback will improve our focus and priority setting within FBCL operations and will inform the next annual report.

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Report

PART 1: IDENTIFYING INFORMATION

Institution or Entity: The Federal Bridge Corporation Limited

Reporting Period: April 1, 2024, to March 31, 2025

Original or Amended Report: Original report

This report was created to meet the FBCL's responsibilities, as a parent Crown corporation, including its wholly owned subsidiary, The Seaway International Bridge Corporation, Ltd. (SIBC). Both entities operate in the province of Ontario and operate in the Transportation sector.

PART 2: REPORT CONTENTS

2.1 Information on the government institution's structure, activities and supply chains

***Which of the following accurately describes the government institution's activities?**

The FBCL does not produce or distribute any goods. The scope of this report is solely directed at the purchasing of goods within Canada. FBCL does not purchase goods from foreign importers to conduct its business and pursue its mandate.

***Provide additional information on the government institution's structure, activities and supply chains.**

The FBCL headquarters are located in Ottawa and it owns four international bridge crossings and associated structures (Canadian side only) in Ontario in the following cities: Sault Ste. Marie, Point Edward, Lansdowne and Cornwall. The FBCL's mandate is to provide the highest level of stewardship so that its international bridge crossings and associated structures are safe and efficient for users.

The FBCL and its subsidiary, SIBC, purchase goods within Canada to support 24/7 international bridge operations. Purchase of goods include:

- Heavy equipment (e.g. trucks, snowplows, street sweepers, maintenance equipment, lifts, road safety equipment, etc.)
- Fuel (e.g. commercial grade diesel, gasoline, natural gas, etc.)

- Tools (e.g. hand tools, pressure washers, needle scalers, etc.)
- Road and bridge repair (e.g. asphalt, paint, sealer, etc.)
- Safety wear (e.g. clothes, uniforms, boots, gloves, masks, safety harnesses, etc.)
- Toll equipment (e.g. ground loops, gates, RFID tags, point-of-service equipment, etc.)
- Cash management equipment (e.g. cash counters, safes, etc.)
- Information Technology equipment (e.g. servers, wireless devices, modems, computers, screens, tablets, etc.)
- Communication (e.g. phones, cell phones, fax machines, etc.)
- Office equipment (e.g. photocopiers, shredders, stationary, etc.)

2.2 Information on the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods produced, purchased or distributed by the government institution

***Indicate steps taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods produced, purchased or distributed by the government institution.**

At this time, FBCL has not identified any risks on its purchase of goods within Canada. The Corporation continues to purchase from reputable companies and continuously monitors news and reports should any inappropriate action be linked to those.

2.3 Information on the policies and due diligence processes in relation to forced labour and child labour

***Does the government institution currently have policies and due diligence processes in place related to forced labour and/or child labour? (Yes or No)**

While FBCL does not have specific language in existing policies or processes related to forced labour and/or child labour, FBCL does have a suite of corporate policies whereby employees have an avenue to report any known such issues in its procurement. These policies include:

- FBCL Values and Ethics Code;
- Policy on Disclosure of Wrongdoing;
- Business Integrity Framework;
- Employment Equity, Diversity and Inclusion Policy.

The FBCL is committed to preventing and mitigating the risk of forced or child labour in its procurement of goods in Canada. It has an implicit obligation under its Values and Ethics Code to take action to mitigate if such risks were identified. In addition, FBCL is currently reviewing other corporate policies whereby specific language surrounding the

elimination of forced labour and/or child labour sourced products will be integrated, as appropriate.

If applicable, please provide additional information on the government institution's policies and due diligence processes in relation to forced labour and child labour

Not applicable.

2.4 Information on the parts of its activities and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage that risk

***Has the government institution identified the parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

FBCL has initiated the process of identifying risks in its supply chain. Procurement policies are being reviewed and FBCL's Enterprise Risk Framework has been updated to ensure appropriate focus.

*** Has the government institution identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries?**

FBCL has not identified any potential forced labour or child labour risks.

If applicable, please provide additional information on the parts of the government institution's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the government institution has taken to assess and manage that risk.

Not applicable.

2.5 Information on any measures taken to remediate any forced labour or child labour

***Has the government institution taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

Not applicable. FBCL has not identified any forced labour or child labour in its activities and supply chains to this date.

If applicable, please provide additional information on any measures the government institution has taken to remediate any forced labour or child labour

Not applicable.

2.6 Information on any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in the institution's activities and supply chains

***Has the government institution taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced or child labour in its activities and supply chains?**

Not applicable. The FBCL has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, it has not taken any measures to remediate.

If applicable, please provide additional information on any measures the government institution has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains

Not applicable.

2.7 Information on the training provided to employees on forced labour and child labour

***Does the government institution currently provide training to employees on forced labour and/or child labour? (Y/N)**

The FBCL currently does not provide training to employees on forced labour and/or child labour. The Corporation is integrating this action item into a future reporting period.

If applicable, please provide additional information on the training the government institution provides to employees on forced labour and child labour.

Not applicable.

2.8 Information on how the government institution assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains

***Does the government institution currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Yes or No)**

The FBCL does not currently have policies and procedures in place to assess the effectiveness of ensuring that forced labour and child labour. However, the existing policies under question 2.3 above apply to many actions that could be tied to ensuring that no forced labour or child labour is found within our procurement practices. FBCL expects its employees to raise such issues if discovered, known, or suspected.

If applicable, please provide additional information on how the government institution assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains

Not applicable.

Key Definitions

Definitions from Section 2 of the Act.

Child labour means labour or services provided or offered to be provided by persons under the age of 18 years and that:

- are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
- constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999.

Forced labour means labour or service provided or offered to be provided by a person under circumstances that:

- could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service;
- constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted at Geneva on June 28, 1930.

Government institution has the same meaning as in section 3 of the *Access to Information Act*. Section 3 defines government institution as:

- any department or ministry of state of the Government of Canada, or any body or office, listed in Schedule I; and,
- any parent Crown corporation, and any wholly owned subsidiary of such a corporation, within the meaning of section 83 of the *Financial Administration Act*.

Head has the same meaning as in section 3 of the *Access to Information Act*:

- in the case of a department or ministry of state, the member of the Queen's Privy Council for Canada who presides over the department or ministry, or,
- in any other case, either the person designated under subsection 3.2(2) to be the head of the institution for the purposes of this Act or, if no such person is designated, the chief executive officer of the institution, whatever their title

Minister represents the Minister of Public Safety and Emergency Preparedness, however, this role (as of January 1, 2024) is assigned to the Minister of Public Safety, Democratic Institutions and Intergovernmental Affairs.

Production of goods includes the manufacturing, growing, extracting and processing of goods.

Due diligence refers to an ongoing management process to identify, prevent, mitigate and account for how an institution addresses actual and potential adverse human rights impacts in their operations and supply chains. There are four key parts to due diligence:

- Identifying and assessing actual and potential human rights impacts (for example, screening new suppliers for risks of forced labour and child labour);
- Integrating your findings across your institution and taking appropriate action to address impacts (for example, introducing internal training on forced labour and child labour, and processes for incident reporting);
- Tracking your institution's performance to check whether impacts are being addressed (for example, doing an internal audit of your supplier screening); and,
- Publicly communicating what you are doing (for example, by publishing your annual report per the Act or publicly responding to allegations against a supplier).



Forced Labour in Canadian Supply Chains - Attestation

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 Federal Bridge Corporation Limited. 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.

Natalie Kinloch

Chief Executive Officer

May 28, 2025

Date

I have the authority to bind The Federal Bridge Corporation Limited.



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