



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

Report for year 2025-26

May 31st 2026

Table of Contents

- Background 2
- Commitment..... 2
- Scope 2
- Obligations 2
- Contacting The Federal Bridge Corporation Limited 3
- Report 4
- PART 1: IDENTIFYING INFORMATION..... 4
- PART 2: REPORT CONTENTS..... 4
- Structure, Activities and Supply Chains 4
- Steps to Prevent and Reduce Risks 6
- Policies and Due Diligence Processes 7
- Risk Identification and Management..... 8
- Remediate Measures..... 8
- Measures for Vulnerable Families 9
- Employee Training..... 9
- Assessing Effectiveness 9
- Key Definitions 10

Background

The Federal Bridge Corporation Limited (FBCL or Corporation) enables bridge crossings, between Canada and the United States, of approximately 9 million motor vehicles annually across FBCL’s ownership portfolio. FBCL’s 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. FBCL operates the Canadian side of one of these crossings (Point Edward), its wholly-owned subsidiary operates another (Cornwall), and the remaining two crossings are operated by American partner entities. 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

FBCL is committed to preventing and mitigating the risk of forced or child labour in its activities and procurement of goods. 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, 2025, to March 31, 2026.

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 feedback with us 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.

Mail:

The Federal Bridge Corporation Limited
Chief Financial Officer
200-55 Metcalfe
Ottawa (Ontario) K1P 6L5

Telephone: (613) 317-5653

Toll Free: 1-866-422-6346

Email: info@federalbridge.ca

Report

PART 1: IDENTIFYING INFORMATION

Government Institution: The Federal Bridge Corporation Limited

Reporting Year: May 31, 2026

Fiscal Year Covered By The Report: April 1, 2025, to March 31, 2026

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 Toll Bridge Operations sector. FBCL’s headquarters are located in Ottawa, Ontario.

PART 2: REPORT CONTENTS

Structure, Activities and Supply Chains

1. Which of the following accurately describes the government institution’s structure?

FBCL is a Parent Crown corporation, headquartered in Ottawa, and it owns infrastructure at four international bridge crossings (Canadian side only) in Ontario in the following cities: Sault Ste. Marie, Point Edward, Lansdowne and Cornwall. FBCL operates the Canadian side of one of these crossings (Point Edward), its wholly-owned subsidiary operates another (Cornwall), and the remaining two crossings are operated by American partner entities. This report additionally describes the actions taken by FBCL’s wholly-owned subsidiary, SIBC.

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. Together, FBCL and SIBC have approximately 120 employees.

2. Which of the following accurately describes the government institution’s activities?

FBCL does not produce or distribute any goods. FBCL and SIBC (collectively “FBCL”) provide international toll bridge services to the public. The scope of this report is solely directed at the purchasing of goods and services in Canada and outside Canada. FBCL

does not purchase goods from foreign importers to conduct its business and pursue its mandate.

FBCL purchases goods within Canada to support 24/7 international bridge operations. Purchases at FBCL in 2025-26 amounted to \$13.5 million. This related to all purchases of these organizations for goods, services, and intangibles, but excluding depreciation and employee wages and benefits. Some examples of significant spending include (but are not limited to):

- Bridge inspection services
- Business and property insurance
- Cash management equipment (e.g. cash counters, safes, etc.)
- Communication (e.g. internet lines, network access, phones, cell phones, fax machines, etc.)
- Credit card and banking fees
- Fuel (e.g. commercial grade diesel, gasoline, natural gas, etc.)
- Heavy equipment (e.g. trucks, snowplows, street sweepers, maintenance equipment, lifts, road safety equipment, etc.)
- Information Technology equipment (e.g. servers, wireless devices, modems, computers, screens, tablets, etc.)
- Information Technology licenses to run business applications
- Infrastructure construction
- Professional services (e.g. translation, legal, internal audit, engineering consulting, etc.)
- Property taxes
- Road and bridge maintenance (e.g. asphalt, paint, sealer, road salt, etc.)
- Safety wear (e.g. clothes, uniforms, boots, gloves, masks, safety harnesses, etc.)
- Servicing of equipment
- Toll equipment (e.g. ground loops, gates, RFID tags, point-of-service equipment, etc.)
- Tools (e.g. hand tools, pressure washers, needle scalers, etc.)
- Utilities

Direct sourcing of these goods and services is primarily from Canada and the United States (approximately 99%). During this reporting period, FBCL purchased goods under its own procurement authority.

Steps to Prevent and Reduce Risks

3. What steps has the government institution taken in its 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.

Over the course of the year, FBCL has worked towards the following:

- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains.
- Developing and implementing an action plan for addressing forced labour and/or child labour.
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains.
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily.
- Developing and implementing anti-forced labour and/or -child labour contractual clauses.

4. Please describe the steps the government institution has taken to prevent or reduce risks of forced labour or child labour in its supply chains.

FBCL has reviewed its types and categories of purchases and contracts, in order to review and determine potential for the use of forced or child labour in its purchases. This review of spending encompassed spending in significant expense areas, and only excluded very minor dealings.

To date, FBCL has not identified any risks on its purchases of goods and services. The Corporation continues to purchase from reputable companies and continuously monitors news and reports should any inappropriate action be linked to those.

In addition, FBCL is undertaking a review of its contracting language and is expecting to add language prohibiting the use of forced and/or child labour. For all major and significant infrastructure contracts, FBCL retains the ability to audit all financial records of the contractor in relation to its contract with FBCL. No such infrastructure works were entered into, or completed, in this past fiscal year.

Policies and Due Diligence Processes

5. Does the government institution currently have policies and due diligence processes in place related to forced labour and/or child labour?

Yes.

While FBCL does not have specific language in existing policies or processes related to forced labour and/or child labour, the Corporation does have a suite of corporate policies whereby employees have an avenue to report any known issues in its procurement. Additionally, FBCL's Human Resources suite of policies, when considered in aggregate, guard against FBCL itself utilizing forced and/or child labour. Policies considered here include:

- *Business Integrity Framework;*
- *Classification Policy;*
- *Compensation and Benefits Policy;*
- *Employee Recourse Policy;*
- *Employment Equity, Diversity and Inclusion Policy;*
- *FBCL Pay Equity Plan;*
- *FBCL Values and Ethics Code;*
- *Policy on Disclosure of Wrongdoing;* and
- *Workplace Harassment and Violence Prevention Policy.*

FBCL is committed to preventing and mitigating the risk of forced or child labour in its recruitment and 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. Annually, FBCL requires every employee to read its *Values and Ethics Code*, as well as the *Policy on Disclosure of Wrongdoing*, which reinforces individuals' rights and responsibilities each year.

5.1 If yes, which of the following statements of the policies and/or due diligence process has the government institution implemented in relation to forced labour and/or child labour?

- Embedding responsible business conduct into policies and management systems.

Risk Identification and Management

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

Yes

While the organization has NOT identified concerns with any of its current suppliers and/or contractors, FBCL has undertaken to understand the types of industries and products that are most traditionally at risk for the use of forced and/or child labour.

6.1 If yes, has the government institution identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains?

- Tier three suppliers
- The use of outsourced, contracted or subcontracted labour
- The use of forced labour

To reiterate, however, while FBCL has identified industries where forced and/or child labour is, or has been, used in areas of significant spending for the organization, FBCL is not aware of any such risks with its current supplier base.

7. 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 forced labour or child labour risks in its activities or supply chains.

8. Please provide details on the parts of the government institution's activities and supply chains where the government institution has identified a risk of forced labour or child labour and describe the actions taken to assess and manage those risks.

FBCL has not identified any forced labour or child labour risks in its activities or supply chains.

Remediation Measures

9. 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.

9.1 If yes, which remediation measures has the government institution taken?

Not applicable.

Measures for Vulnerable Families

10. 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. 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.

Employee Training

11. Does the government institution currently provide training to employees on forced labour and/or child labour?

In the 2025-26 fiscal year (reporting period) FBCL did not provide training to employees on forced labour and/or child labour. However, a self-paced online course is available to federal public servants on the Canada School of Public Service's learning platform as of November 2025. It is the intent of FBCL to ensure all managers who procure goods and services take this course within the next fiscal year.

11.1 If yes, is the training mandatory?

In the reporting period, not applicable.

Assessing Effectiveness

12. 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?

FBCL does not currently have policies and procedures in place to assess the effectiveness of ensuring that forced labour and child labour are not present in its activities and supply chains. However, the existing policies identified in Part 2 Question 5, above, are reviewed by FBCL management on a regular basis, and employees are encouraged to discuss concerns or questions with their People Leaders.

12.1 If yes, what method does the government institution use to assess its effectiveness?

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:

- a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- c) 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
- d) 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:

- a) 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; or
- b) 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*.

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