



**TRISUMMIT UTILITIES INC.**

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

**May 7, 2025**

## Introduction

This report (the “**Report**”) is made jointly by TriSummit Utilities Inc. (“**TSU**”) and those of its wholly owned subsidiaries listed in Schedule “A” hereto (together with TSU, the “**Company**”) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Act**”) for the financial year ending December 31, 2024.

## About the Company

The Company is a North American enterprise that owns and operates diversified rate-regulated distribution, transmission and storage utility assets and long-term contracted renewable power generation assets. The Company’s two business segments are comprised of:

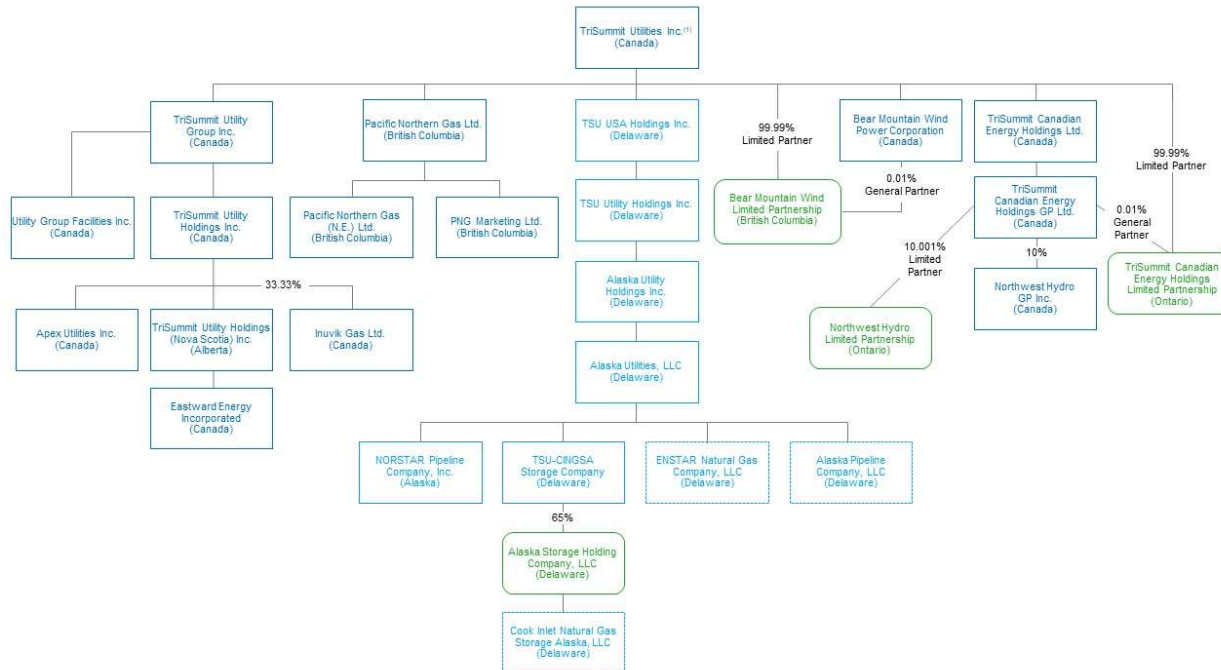
- *Utilities*, which owns and operates rate-regulated distribution and transmission assets in Alaska, Alberta, British Columbia and Nova Scotia. The Company also owns an indirect 65 percent interest in a regulated storage utility in Alaska. In aggregate, the utilities had approximately C\$2.1 billion of rate base as at December 31, 2024, inclusive of construction work in progress, and served approximately 292,000 customers across Canada and the United States.
- *Renewable Energy*, which includes the 102 MW Bear Mountain Wind Park and an approximately 10 percent indirect interest in the 303 MW Northwest Hydro facilities.

The Company also has a Corporate reporting segment, which primarily includes the cost of providing shared services, financing and access to capital, and general corporate support as well as its equity investment in the NGIF Cleantech Ventures Limited Partnership.



## Company Structure

TSU is incorporated under the *Canada Business Corporations Act*, and its registered office and principal place of business is in Calgary, Alberta. The Company conducts its business primarily through its subsidiaries. The following organization diagram presents the name and the jurisdiction of incorporation or formation of TSU and its subsidiaries as at December 31, 2024:



Note:

(1) Ownership is 100% unless indicated otherwise.

## Policies

The board of directors of TSU (the “**Board**”) requires the Company’s staff, as well as its contractors, consultants, representatives, and agents, to conduct business in an ethical manner and in compliance with applicable laws, rules, and regulations and the TSU Code of Business Ethics (the “**COBE**”). The Company also seeks to do business with vendors that similarly conduct their businesses in an ethical and lawful manner.

The Board monitors compliance with the COBE through reports of management to the Board and requires that all persons subject to the COBE provide an annual certification of compliance with the COBE. The Board has adopted a number of policies to encourage ethical business conduct, including an Anti-Corruption Policy and a Whistleblower Policy that provides the Company’s stakeholders the ability to report, on a confidential and anonymous basis, any violation of law or policy, including the use of forced labour or child labour, or any conduct or activity that is ethically, morally, or legally questionable.

The Board receives quarterly reports of any complaints received under the COBE or the Whistleblower Policy that are received by the Chair of the Board, any committee chair or through EthicsPoint.

The Company aims to build long-standing relationships with trusted vendors. To that end, the Company is in the process of developing and implementing additional actions to address the risk of the use of forced labour and child labour in its supply chains, including potential additions to due diligence processes for vendors under the Company's procurement policies, new policies and procedures, such as a vendor code of conduct, and changes to the Company's standard terms and conditions.

## **Supply Chains**

In 2024, the Company continued the assessment of the risk of the use of forced labour and child labour in its supply chains it began in 2023. The Company identified that it had approximately 4,000 direct vendors active in its systems, of which approximately 77% are located in Canada and approximately 22% are located in the United States. Less than 1% of the Company's direct active vendors are located outside of Canada and the United States, the majority of which are located in Europe. Additionally, as at December 31, 2024, the Company had approximately 723 full-time and part-time employees in Canada and the United States.

The Company's direct and indirect vendors provide a wide range of goods and services, including natural gas, transportation services, construction materials, industrial supplies, vehicles, machinery and other equipment, construction and engineering services, facilities maintenance and repair services, office supplies, utility services, consulting and advisory services, contract labour, cleaning products and services, financial services, and corporate support services.

## **Risk of Forced Labour and Child Labour**

The Company has assessed the risk of the use of forced labour and child labour in its workforce and by its direct vendors as being low. However, the Company will continue to review the risk of the use of forced labour and child labour in its supply chains and to identify additional steps it can take to better recognize and, where applicable, reduce the risk of the use of vendors employing forced labour and child labour. The Company acknowledges that there is risk of the use of forced labour and child labour in its indirect suppliers' supply chains, and the Company intends to further assess this risk.

## **Remediation Measures**

The Company did not identify any instances of forced labour or child labour in its supply chain in 2024 and consequently has not undertaken any measures to remediate the effects of any forced labour or child labour.

## Training

The Company does not currently provide training to its staff on how to identify and mitigate the risk of the use of forced labour and child labour in its supply chains. The Company is currently considering the implementation of training and awareness materials for employees who are involved in the Company's supply chain as part of ongoing efforts to assess and address the risk of the use of forced labour and child labour in its supply chains.

## Ongoing Assessment

The Company will continue to monitor its activities and require that its business is conducted in an ethical and lawful manner through the mandatory COBE compliance process. As the Company develops and implements measures to reduce the risk that forced labour and child labour are being used in its supply chains, the Company will consider additional steps to aid in assessing the effectiveness of its policies and procedures.

## Attestation

This Report was approved by the Board of Directors of TriSummit Utilities Inc. on May 7, 2025, pursuant to subparagraph 11(4)(b)(ii) of the Act.

In my capacity as a Director of TriSummit Utilities Inc., and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

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 Company. 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 2024 reporting year.

(signed) "*Jared Green*"

**Jared Green**

President & Chief Executive Officer and a Director

May 7, 2025

*I have the authority to bind TriSummit Utilities Inc.*

## **SCHEDULE "A"**

### **Reporting Entities**

The following entities owned, directly or indirectly, by TSU are also required to report under the Act and are included in this Report:

- Apex Utilities Inc.
- Eastward Energy Incorporated
- Pacific Northern Gas Ltd.