

# FIGHTING AGAINST **MODERN SLAVERY** 2024-25 REPORT



May 29, 2025

The Honourable Gary Anandasangaree  
Minister of Public Safety  
House of Commons  
Ottawa, Ontario  
K1A 0A6

Re: *SaskPower's Modern Slavery Report (2024) - Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)*

Dear Minister:

In accordance with the provisions of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, SaskPower is submitting its Report Regarding Modern Slavery, covering its fiscal year April 1, 2024, through March 31, 2025 (the "Report").

The Report captures SaskPower's supply chain due diligence practices and continued efforts towards detecting, preventing and mitigating the risk of modern slavery.

Respectfully submitted,



Rupen Pandya  
President and CEO  
SaskPower

Attachment: *SaskPower's Modern Slavery Report (2024) - Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)*

Cc: The Honourable Jeremy Harrison, Minister Responsible for SaskPower  
Bryan Leverick, Acting Chair, Board of Directors, SaskPower  
Kent Campbell, President and CEO, Crown Investments Corporation of Saskatchewan  
Rachelle Verret Morphy, Executive Vice President, Legal & Corporate Services and General Counsel, SaskPower  
Rhea Brown, Executive Vice President, Customer Experience & Procurement, SaskPower

# FIGHTING AGAINST MODERN SLAVERY | REPORT

*Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)*

**2024-25**

---

## INTRODUCTION

This Report constitutes Saskatchewan Power Corporation's Report Regarding Modern Slavery (Report), covering our fiscal year April 1, 2024, through March 31, 2025 (the "Reporting Period").

This Report is made on behalf of Saskatchewan Power Corporation (collectively "SaskPower", "we", or "our") pursuant to the provisions of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act).

It captures SaskPower's supply chain due diligence practices and our continued efforts towards detecting, preventing, and mitigating the risk of modern slavery. This includes but is not limited to forced labour, human trafficking, and exploitation, that may be used in SaskPower's supply chains. SaskPower prohibits any form of modern slavery within our workforce and supply chain. We also encourage our suppliers to be industry leaders by adopting health and safety, labour, environmental, and ethical standards that ensure fair treatment and equitable opportunities for all individuals involved in their operations and supply chains.

## OUR STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

### OUR CORPORATE STRUCTURE AND BUSINESS ACTIVITIES

#### Corporate Profile

Established in 1929, SaskPower is a provincial Crown corporation governed by *The Power Corporation Act* and serves as Saskatchewan's primary electricity supplier. We are defined by our commitment to support economic growth and enhance the quality of life in our province. Our corporate mission: ensuring reliable and affordable power for our customers and the communities we serve.

Our company's vision, mission and values flow from *The Power Corporation Act* and SaskPower's relationship with Crown Investments Corporation of Saskatchewan (CIC). We support the strategic direction provided by CIC. In turn, CIC is responsive to general government direction as articulated in a variety of ways, such as through the annual Speech from the Throne or formal policy statements.

Pursuant to *The Power Corporation Act*, the President and Chief Executive Officer of SaskPower reports to a Board of Directors appointed by the Lieutenant Governor in Council. Through the Chair, our company's Board of Directors is accountable to the Minister Responsible for SaskPower. The Minister functions as a link between SaskPower and provincial cabinet, as well as the Saskatchewan Legislative Assembly.

## Our Operations

At SaskPower, we are committed to supporting economic growth and enhancing the quality of life in Saskatchewan. At the foundation of our business strategy is the pursuit of our vision of powering Saskatchewan through innovation, performance and service. We work around the clock to provide power generation, transmission and distribution services to over 550,000 customer accounts. Our company prides itself on maintaining one of the largest service areas in Canada — a geographic region of approximately 652,000 square kilometres.

SaskPower is a vertically integrated utility with more than 3,200 permanent full-time employees. Almost half of our workforce is composed of members of the International Brotherhood of Electrical Workers Local 2067. Approximately 13 per cent of workers are members of Unifor Local 649, with out-of-scope staff accounting for the balance.

Our company manages nearly \$14 billion in assets, relying on generation sources that use a wide range of fuels that include natural gas, coal, hydro, wind and solar.

## OUR SUPPLY CHAIN

SaskPower's supply chains consist of centralized procurement, contracting, and logistics functions, which manage the purchasing of goods and services, as well as the storage and distribution of equipment and materials to project sites across Saskatchewan. We collaborate with numerous suppliers from local, domestic, and international sources. This diversified supply chain ensures operational integrity, maintains the reliability of the provincial power grid, and contributes to delivering affordable power to our customers.

Key procurement categories include generation equipment and materials (such as turbines and maintenance parts), transmission and distribution equipment and grid components (including towers and poles, transformers, wires and cables, substation components), and various services for construction, maintenance, information technology and smart grid solutions (such as meters and control systems). In the fiscal year 2024-25, SaskPower committed to approximately \$1.2 billion in contracts. Of this amount, approximately \$780 million, or 64.5 per cent, was awarded to suppliers in Saskatchewan. Remaining specialized equipment and materials were sourced from suppliers outside Saskatchewan, including domestic and international vendors, based on SaskPower's operational needs and the outcome of competitive procurement processes.

Our supply chain supports infrastructure investment throughout Saskatchewan, including:

- renewing, refurbishing, or replacing existing generation, transmission and distribution infrastructure, either through an annual program or one-time project
- new generation, transmission or distribution additions to accommodate growth in demand and customer connections
- upgrades and improvements to technology and security, supply chain, and other strategic projects

## OUR POLICIES AND DUE DILIGENCE PROCESSES

SaskPower has developed and continues to enhance policies and procedures to address modern slavery, including supply chain due diligence reviews, supplier onboarding assessments, and supplier performance management throughout the procurement and contracting processes. We emphasize transparency and accountability in our procurement practices, with the goal of sourcing goods and services that meet SaskPower's operational requirements while also supporting the local community and adhering to Canadian human rights values and principles.

## Employee Code of Conduct

The SaskPower Code of Conduct Policy ("Code") applies to the Board of Directors of SaskPower, SaskPower officers, employees, and contractors, as well as to directors, officers, and employees of SaskPower subsidiaries (collectively "SaskPower Personnel"). The Code is intended to provide SaskPower Personnel with both general and specific guidelines to protect those faced with ethical, moral and legal dilemmas during the course of their employment or in carrying out their duties. SaskPower expects all personnel to uphold the corporate values and principles in their work activities and in any area where they could be seen to be representing SaskPower. In keeping with this, it is the responsibility of all personnel to ensure they become familiar with and stay current on the contents of the Code as it is updated from time to time. In relation to modern slavery, our Code helps ensure that SaskPower Personnel obey fair labour practices, comply with health and safety legislation, promote a respectful workplace, and follow all procurement policies and procedures.

## Supplier Code of Conduct

We have a principles-based Supplier Code of Conduct that articulates SaskPower's expectations with respect to a supplier's business integrity, responsible business practices, and responsible treatment of individuals and the environment. SaskPower encourages our suppliers to be leaders in their industries by adopting health and safety, labour, environmental, and ethical principles that ensure the well-being of their employees.

In all activities, suppliers must conduct business in full compliance with the laws, rules, and regulations of the countries and jurisdictions that are applicable to them. Suppliers are encouraged to exceed legal compliance to advance social and environmental responsibilities. Suppliers are expected to take all reasonable measures to apply the Supplier Code of Conduct across their entire business and within their own supply chain.

## Due Diligence Processes

SaskPower prioritizes early detection and prevention as integral components of our supply chain due diligence process and anti-modern slavery strategy.

As part of the procurement and contracting process, suppliers are afforded the opportunity to self-assess and provide information. In addition to assessing the suppliers' voluntary disclosures, SaskPower may also perform our own due diligence in relation to the supplier that may include, but is not limited to: third-party audit, factory/site visit, adverse media search, and public database searches (corporate search, court filings in Canada and abroad), to ensure conformance to our quality, performance, and ethical standards.

Furthermore, when evaluating global sourcing options, especially where countries or regions present elevated risks, SaskPower also consults advisories and alerts published by the relevant federal and provisional authorities to obtain updated information and enhanced level of understanding on the risks involved to ensure appropriate measures are being taken to address any issues or concerns.

## FORCED LABOUR AND CHILD LABOUR RISKS

While no specific incident of forced labour has been identified in SaskPower's equipment supply to date, the risk remains given its global prevalence. We remain vigilant in our supply chain management practices, considering that forced labour, child labour, and human trafficking may be present in our extended supply chains. Through collaboration with our direct suppliers, we are diligently working to address these upstream risks.



## OUR ACTIONS TO ADDRESS MODERN SLAVERY RISKS

This year, we are refining our strategy to combat modern slavery through an in-depth review of our procurement and contracting practices and the exploration of strategic measures to incorporate modern slavery risk management into our enterprise supply chain resilience framework. Key initiatives include:

### Supplier Code of Conduct Review

SaskPower has established a Supplier Code of Conduct that requires all suppliers to adhere to ethical labour practices. This year, efforts have been undertaken to review the code, and collaborations with the Supply Relations Management team are ongoing to identify suitable measures to further enhance safeguards against modern slavery and human trafficking risks. This initiative aims to ensure that all suppliers uphold high ethical standards.

### Research on Technology Solution / Assessment Service Provider

We are also conducting initial research into available technology solutions and third-party certification organizations to perform social audits of our suppliers. These audits would offer an independent assessment of the suppliers' labour practices, helping mitigate the risks of modern slavery in our extended supply chain.

### Ongoing Supplier Engagement

SaskPower actively engages with its suppliers to promote ethical labour practices. This includes regular communication, collaboration on supply chain risk management initiatives, and support for suppliers in improving their labour practices.

## OUR REMEDIATION MEASURES

SaskPower is not aware of any instances of forced labour or child labour during the Reporting Period. Consequently, no remediation activities have been required or conducted.

## OUR REMEDIATION OF LOSS OF INCOME

SaskPower is not aware of any vulnerable families that have experienced any loss of income during the Reporting Period. As a result, no remediation activities have been required or undertaken to address loss of income.

## OUR TRAINING

Understanding and complying with the Code of Conduct is a condition of employment at SaskPower, and employees and contract workers must complete the Code of Conduct training course and acknowledgment annually.

SaskPower also encourages and supports its procurement leads in obtaining focused training on modern slavery risks through their professional associations with Supply Chain Canada. In 2024, SaskPower conducted internal leadership briefings and awareness campaigns to educate senior leadership and procurement and contract staff about the requirements of Canada's new supply chain legislation. These initiatives aim to enhance awareness of ethical labour practices and ensure that both leaders and staff members are informed of the expected standards and risks associated with modern slavery.

## ASSESSING OUR EFFECTIVENESS

We acknowledge that the battle against modern slavery is a long-term endeavour, necessitating sustained efforts from all stakeholders across supply chains.

SaskPower regularly reviews feedback from stakeholders, government advisory/publications,

and industry reports to enhance our efforts in monitoring modern slavery risks and implementing targeted responses within our supply chain, where applicable. Additionally, we use supplier engagement surveys to gather input from suppliers regarding the clarity and impact of our Supplier Code of Conduct and ethical standards, thereby promoting transparency and collaboration on fair labour practices within our supply chain. SaskPower remains committed to continuously improving our methodologies, due diligence processes, and supply chain practices to assess the progress we are making in addressing the risks associated with modern slavery and human trafficking.

## REPORT APPROVAL AND ATTESTATION

The Report is approved by Directors of the SaskPower Board. In accordance with the requirements of the Act, and in particular section 11 thereof, I, in the capacity of President and CEO, attest that I have reviewed the information contained in this Report for SaskPower. 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 financial year ending March 31, 2025.

## NOTICE

SaskPower is filing this Report because we support the Act's goals of preventing and reducing the risk of forced or child labour in supply chains. By filing this Report, SaskPower is not conceding that the Act applies to it, nor is SaskPower conceding that the federal government has jurisdiction over SaskPower or any provincial agencies or corporations respecting any of the matters addressed by the Act. This filing is without prejudice to any legal rights, defenses, powers, rights, immunities or exemptions that SaskPower may have under any law. This filing does not set a precedent for this or any other similar matter in the future, and we reserve the right to decline to file future reports.



I have authority to bind SaskPower

Rupen Pandya  
President and CEO

May 29, 2025



I have authority to bind SaskPower

Bryan Leverick  
Acting Chair, Board of Directors

May 29, 2025