

1425447 Ontario Limited

2025 Report on Bill S-211:

**An Act to enact the Fighting Against Forced Labour and
Child Labour in Supply Chains Act**

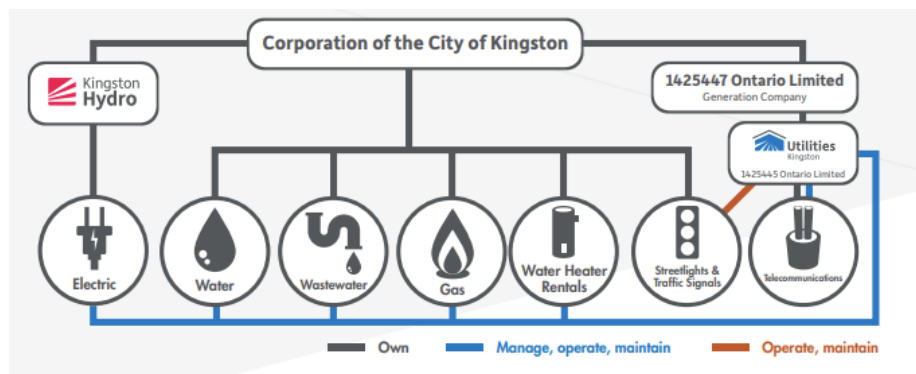
1425447 Ontario Limited 2025 Report on Bill S-211: Fighting Against Forced Labour and Child Labour in Supply Chains Act

Structure, Activities and Supply Chains

1425447 Ontario Limited (“Entity”) is wholly owned by the Corporation of the City of Kingston. 1425447 holds the shares of 1425445 Ontario Limited (operating as “Utilities Kingston”), referred to throughout the report as Utilities Kingston. Given that 1425447 Ontario Limited is a shareholder and controlling entity, this report on Bill S-211 describes the activities and supply chain information for the controlled entity, Utilities Kingston.

1425447 Ontario Limited is submitting a report on Bill S-211 because the corporation holds the shares and is a controlling entity of Utilities Kingston who has a place of business in Canada, does business in Canada, has assets in Canada, meets the minimum reporting thresholds for assets, revenue and number of employees, and is a controlling entity of Utilities Kingston who has imported minimal goods in the reporting year. It is uncertain if Utilities Kingston as a multi-utility **service** provider is considered to be producing, selling, or distributing “goods” pursuant to section 9 of the Act and if the minimal imports would meet any reporting thresholds. **In turn, it is uncertain if 1425447 Ontario Limited, as a shareholder of Utilities Kingston is considered to be controlling an entity engaged in the activities described in the Act, without further confirmation 1425447 Ontario Limited has chosen to report and comply in support of the Act.**

Figure 1: 1425447 Ontario Limited’s relationship with The Corporation of the City of Kingston and 1425445 Ontario Limited (operating as “Utilities Kingston”)



Utilities Kingston is incorporated under the Ontario Business Corporations Act. Utilities Kingston is committed to manage, operate, and maintain community infrastructure to deliver safe, reliable services to the community and a personal customer experience. The relationship between Utilities Kingston and the City of Kingston, has resulted in solid asset management practices for Kingston, low costs for utility consumers and superior customer service and reliability for the community. Through the multi-utility model, Utilities Kingston manages water, wastewater, natural gas and appliance rental assets of the City of Kingston and operates and maintains the City of Kingston’s traffic

signal and street lighting infrastructure. Utilities Kingston also owns and operates a Community Broadband Network business, providing broadband network services to organizations and businesses in Kingston that benefits all constituents. In addition, Utilities Kingston manages, operates and maintains the electricity assets of Kingston Hydro Corporation.

Utilities Kingston's strength lies in its highly skilled cross-functional team. Utilities Kingston employs 260 people with a diverse set of skills, knowledge and expertise with a high level of collaboration between groups. Employment contracts and workplace policies are reviewed regularly to ensure compliance with workplace laws and regulations. Together, the employees and Utilities Kingston take pride in supporting the community, which benefits from an open, sustainable, and reliable utility. Public accountability ensures the continuity of vital services that meet the highest safety standards. The employees of Utilities Kingston also provide asset management, billing, operational and maintenance services to Kingston Hydro. The assets of Kingston Hydro are managed, maintained and operated by the employees of Utilities Kingston. Utilities Kingston is filing a separate report on *Bill S-211 An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Policies, Due Diligence Processes, and Training

1425447 Ontario Limited is a controlling entity of Utilities Kingston. Utilities Kingston is committed to safe and reliable multi-utility services. Utilities Kingston complies with all applicable provincial and federal laws and regulations and ensures core values of safety, integrity, innovation and reliability are supported with fair and equitable hiring practices and employment. Utilities Kingston employs a diverse set of employees including but not limited to, electricians, GIS technicians, gas operators, millwrights, certified accountants, professional engineers and certified human resources professionals. Continuing education, training and collaboration between groups supports Utilities Kingston employees with opportunities to continuously learn and contribute to the community through creativity and innovation.

In 2024, Utilities Kingston implemented a mandatory annual employee training program for all employees involved in the purchasing and approval processes. The training program supports continued enhancements of knowledge, skills, and awareness relating to best practices to continue prevention of forced and child labour throughout the corporation and supply chains, including the importance of ethical sourcing and informed ethical decisions. In 2025, all employees involved in the purchasing and approval process successfully completed the annual training.

Utilities Kingston complies with all applicable provincial and federal laws and regulations as a minimum standard. All Utilities Kingston employees are trained and supported to comply with this commitment and corporate policies and standards. Utilities Kingston places the mental and physical health of all employees and the community at the utmost importance.

Laws and Regulations include:

- Employment Standards Act 2000;
- Labour Relations Act, 1995;
- Personal Information Protection and *Electronic Documents Act* (Canada), 2000;
- Ontario Human Rights Code, R.S.O. 1990;
- Accessibility for Ontarians with Disabilities Act (AODA); and
- Occupational Health and Safety Act as amended, R.S.O. 1990 ("OHSA).

Internal Codes & Policies include:

- Code of Conduct;
- Health and Safety Policies and Training;
- First Aid Certification;
- Privacy Policy;
- Customer Privacy Policy;
- Mental Health, Safety, and Well-being Training;
- Ergonomics Training and Assessments;
- Pay Equity Policy;
- Nepotism Policy;
- Preventing Slips, Trips, and Falls Training;
- Compensation and Benefits Training and Awareness;
- Employment Standards Act Training;
- Employee Culture Training;
- Disconnecting from Work Policy;
- Diversity, Equity, and Inclusion Policy, referring to the Ontario Human Rights Code, and Canadian Human Right Act;
- Accessible Customer Service Policy;
- Volunteering Policy;
- Purchasing Policy;
- Employee and Family Assistance Program Training;
- Workplace Harassment and Discrimination Policy; and
- IT Training and Policies.

Utilities Kingston strives to only work with suppliers and manufacturers that align with core values and purchasing policies and that all purchasing is undertaken in a fair and equitable manner. The Utilities Kingston purchasing policy ensures that purchasing is in accordance with industry standards and regulations.

In 2024, Utilities Kingston completed an in-depth review of the code of conduct and purchasing policy to support continuous enhancements. The updated code of conduct and purchasing policy have gone through a review process throughout 2024 with full approval and implementation of the updates in 2025. In 2024, Utilities Kingston

launched a review for an updated software system, including demonstrations of software capabilities, to enable and support a thorough supply chain verification process. The selected software system, QCsolver, launched in 2025. Utilities Kingston is committed to continuous review and enhancement of all policies and practices.

Risk and Mitigation of Risk of Forced Labour and Child Labour

1425447 Ontario Limited is a controlling entity of Utilities Kingston. Utilities Kingston adheres to laws, policies and procedures and Utilities Kingston is confident that there is no forced labour or child labour within the employees of Utilities Kingston, all of whom work and reside in Ontario, Canada. Utilities Kingston operates in the utility industry with purchases and supply chains involving utility infrastructure equipment, maintenance and materials and supporting resources, including administrative resources for the utility industry for the gas, water, sewer, water heater and broadband equipment and materials that it then uses to assemble according to policies and regulations. Utilities Kingston is highly committed to the health, safety, and well-being of its employees and the community. Bill S-211 seeks to eradicate child labour and forced labour contributions to the Canadian economy particularly in the areas as identified by the report *Ending child labour, forced labour and human trafficking in global supply chains: International Labour Organization, Organisation for Economic Co-operation and Development, International Organization for Migration and United Nations Children's Fund, 2019*. The report specifically identifies Africa, Asia, Latin America and the Caribbean as areas of concern. Due to the nature of the utility industry, Utilities Kingston's regular activities within the supply chain are comprised within Canada, with minimal levels of imported "goods" from outside of Canada within activities in the reporting year.

Assessment of Effectiveness, Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

1425447 Ontario Limited is a controlling entity of Utilities Kingston. Utilities Kingston has witnessed no evidence of forced labour or child labour in its supply chains and activities. Utilities Kingston launched a new software system, QCsolver, in 2025 to support supply chain review and verifications and implementing business practices to continue to enhance risk mitigation. Given the industry, location of Utilities Kingston's business practices, and the high quality required for equipment and purchases by Utilities Kingston to be used within utility infrastructure and systems, the risk of forced labour and child labour being present in Utilities Kingston's first and second tiers of the supply chain is relatively low. However, Utilities Kingston is committed to collaborative work with suppliers within the supply chain, along with industry stakeholders to understand and assess risks of forced labour and child labour and are committed to continuously enhancing practices to combat forced labour and child labour. Forced labour and child labour is a real, yet hidden issue. 1425447 Ontario Limited as a shareholder and controlling entity and Utilities Kingston will not tolerate either forms of slavery in business practices or supply chains.

Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act)*, and in particular section 11 thereof, we, in the capacity of President and Chief Executive Officer and Chief Financial Officer and Treasurer, Corporate Secretary, attest that we have reviewed the information contained in the report on behalf of the governing body of the entity listed above. Based on our knowledge, and having exercised reasonable diligence, we 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 within this report.

The 1425447 Ontario Limited Board of Directors has approved this report and has approved attestation by David Fell and Randal Murphy.

Full Name: David Fell

Title: President and Chief Executive Officer


Date: 5/7/2026

Signature:  Signed by: David Fell
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Full Name: Randy Murphy

Title: Chief Financial Officer and Treasurer,
Corporate Secretary

Date: 5/7/2026

Signature:  Signed by: Randy Murphy
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“We have the authority to bind 1425447 Ontario Limited.”