

## Report on Fighting Against Forced Labour and Child Labour in Supply Chains

*For the financial reporting year January 1, 2024 – December 31, 2024*

### 1. Introduction

This report has been prepared pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (hereinafter, the "Act"). The Act requires government institutions (and certain other entities) to report annually on the measures they have taken during their previous financial year to prevent and reduce the risk of forced labour or child labour in the government institution's operations and supply chain. When used in this report, the terms "forced labour" and "child labour" have the meanings ascribed to them by the Act.

### 2. Structure, activities, and supply chains

#### 2.1 Structure

Canada Hibernia Holding Corporation (CHHC) is a wholly owned subsidiary of Canada Development Investment Corporation (CDEV), which is a federal parent Crown Corporation. CHHC was formed in March 1993 for the purpose of holding and managing the Government of Canada's ownership interests in the Hibernia Project. CHHC was incorporated under the provisions of the *Canada Business Corporations Act* and is subject to the provisions of the *Financial Administration Act*. CHHC's head office is located in Calgary, Alberta.

#### 2.2 Activities

CHHC holds and manages the Government of Canada's ownership ("working interests") in the Hibernia Project, which is an oil development and production project located offshore Newfoundland and Labrador. The Hibernia Project is a joint venture comprising the original Hibernia Development Project area, where CHHC has an 8.5% working interest, and the Hibernia Southern Extension Unit ("HSE Unit"), where CHHC has a 5.67% working interest. The operator of the Hibernia Development Project is Hibernia Management and Development Company Ltd. (HMDC) and the operator of the HSE Unit is ExxonMobil Canada Properties.

CHHC manages the marketing and transportation of its share of Hibernia crude oil.

#### 2.3 Hibernia supply chain

ExxonMobil Canada Properties is the largest working interest owner in the Hibernia Project and is the services provider to HMDC pursuant to a services agreement. As services provider, ExxonMobil Canada Properties (or its affiliates) provides all personnel and support services to HMDC, including contracting and procurement services, and is required to follow all laws and regulations applicable to the Hibernia Project. Accordingly, the supply chain for the Hibernia Project is effectively managed by ExxonMobil Canada Properties personnel, processes, and procedures. More details about HMDC's formalized contracting and procurement process can be found on the Hibernia website ([www.hibernia.ca](http://www.hibernia.ca)).

Given CHHC's non-operated role as a holding company with minority interests in a single asset (Hibernia Project), CHHC has a limited supply chain of its own as described in section 2.4.

## **2.4 CHHC supply chain**

CHHC is a non-operating owner of the Hibernia oil field and as such, CHHC is not an active procurer of goods and services in its own right but rather the Hibernia field operator (HMDC and ExxonMobil Canada Properties) acquires most of the goods and services that CHHC is obligated to pay for.

CHHC is responsible for transporting and marketing its share of oil produced at the Hibernia platform. CHHC participates in a basin wide transportation and transshipment system with other East Coast Canada offshore oil projects, comprising a fleet of shuttle tankers operated by Altera (Atlantic) Chartering ULC, and transshipment services provided by the Newfoundland Transshipment Limited (NTL) terminal, both located in Newfoundland and Labrador.

CHHC's operations at its Calgary office require a variety of services, the majority of which entail highly skilled and trained professions. CHHC has long-term relationships with its key professional advisors in legal, engineering, reserves evaluation and reporting, information technology, tax services, and internal and external auditing. Minor expenditures are incurred for computer equipment, office supplies, and furniture to support its small staff of seven employees.

In addition, CHHC has certain long-term personal services contractors in lieu of permanent employees who provide services that include technical analysis, joint venture advisory and information technology.

CHHC procures its office services and supplies pursuant to a Procurement Policy and a Delegation of Authority Policy, both as approved by its Board of Directors.

## **3. 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 CHHC**

CHHC management continues to monitor internal risk of forced labour and child labour that might exist in our activity and supply chain. During the year, all CHHC personnel were provided training on the new reporting obligation under the Act and its implications for the organization.

CHHC will continue to identify training opportunities to increase awareness within CHHC of forced labour and child labour, and plans to review and amend, if necessary, its corporate policies in 2025.

## **4. Policies and due diligence processes**

### **4.1 Policies**

CHHC is committed to respecting and promoting the highest standards of ethics and integrity in its dealings with employees, customers, suppliers, and other stakeholders. This commitment is supported by corporate policies including an Employee Code of Conduct, which contains principles and guidelines for ethical and lawful behaviour; a Whistleblower Policy; and a Harassment and Violence Prevention Policy which incorporates elements of the Canadian Human Rights Act. CHHC also implements an enterprise risk management program to aggregate and monitor material risks. The program is designed to identify and assess risks that could significantly affect CHHC's strategic objectives. The program operates within the guidelines of a framework which includes a risk register, detailed risk assessments, and semi-annual reports to its Board of Directors.

Given the minimal amount of procurement at CHHC and nature of operations, CHHC does not use Public Services and Procurement Canada or Shared Services Canada and is not required to follow Canada's Government Contracts Regulations. Rather, CHHC's procurement process is overseen by the executive team in accordance with its Procurement Policy under the oversight of its Board of Directors.

In our operations, we do not utilize forced or compulsory labour. All of CHHC's employees are above the legal minimum employment age in Canada and are provided with working conditions and benefits that comply with applicable laws and regulations.

#### **4.2 Due diligence processes**

CHHC's due diligence in its governance role has relied on statements and reports filed publicly by key service providers including ExxonMobil Corporation and Alterra Infrastructure L.P. describing their supply chains and affirming their adherence to internationally recognized labour standards and applicable legislation across their global operations.

Also, CHHC actively participates on the various management and technical committees that collectively oversee the ongoing business planning and operations of the Hibernia Project.

The goods and services directly procured by CHHC are from reputable companies located in Canada.

Our due diligence process for identifying and assessing human rights risk focuses on the type of supplier, the commodity or service being procured, and the location of the supplier.

### **5. Information on the parts of CHHC 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**

CHHC management continues to monitor internal risk of forced labour and child labour that might exist in our activity and supply chain.

Based on this risk assessment, the risk of non-compliance with the Act is minimal for CHHC's supply chain due to the nature of our suppliers which are mostly local professional service providers.

CHHC will continue to identify emerging risks through regular review of our policies and procedures along with training and development of our staff.

### **6. Measures taken to remediate any forced labour or child labour**

In 2024, CHHC did not identify any instances of forced labour or child labour in its activities or supply chain, hence no measures were taken.

### **7. Measures taken to remediate the loss of income to the most vulnerable families that results from any measures taken to eliminate the use of forced labour or child labour in CHHC's activities and supply chains**

In 2024, CHHC did not identify any instances of forced labour or child labour in its activities or supply chain, hence no measures were taken.

## **8. Training provided to employees on forced labour and child labour**

Our commitment to human rights is reinforced through self learning and training. In 2024, all CHHC personnel were provided training on the new reporting obligation under the Act.

CHHC will continue to provide mandatory training to all employees making contracting or purchasing decisions on behalf of the organization to ensure they are equipped with the knowledge and skills necessary to identify issues related to forced labour and child labour. By investing in employee training, CHHC aims to raise awareness and promote a culture of compliance.

## **9. Assessing effectiveness**

CHHC does not currently have procedures in place to assess our effectiveness in ensuring that forced labour and child labour are not being used in our activities and supply chains. In future years, CHHC will explore methods to monitor, evaluate, and track the effectiveness of our actions.