

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

### **2024 Annual Report**

#### **1) Structure, Activities and Supply Chains**

##### **a) Structure**

###### Legal & Corporate Structure & Employees

Windsor Canada Utilities (WCU) was incorporated in December 1999. It is a holding company with no employees or direct supply chain activities, owned by its sole shareholder the Corporation of the City of Windsor (City).

WCU's mission is to optimize community prosperity through delivery of utility services at competitive rates, achieving maximum shareholder value through sustaining the utility's business, enlightened dividend policies, and retaining a viable municipal tax base through local business retention and new development.

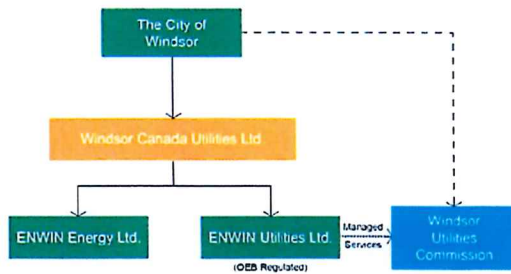
As such, WCU's principal activity is to provide strategic direction and guidance to the operations of its wholly owned subsidiaries ENWIN Utilities Ltd. (ENWIN), a rate-regulated electrical distribution company, and ENWIN Energy Ltd. (EWE), a non-regulated service company. EWE does not have reporting obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act)*. Therefore, the supply chain activities set out in this report are performed by ENWIN and its employees.

ENWIN was incorporated in December 1999. It is a regulated electricity Local Distribution Company (LDC) operating in its service territory in Windsor, Ontario. ENWIN owns and maintains an electricity distribution system that serves almost 91,000 residential and commercial customers. It employs 312 people, all of whom reside in Canada. Most of this workforce is engaged directly via employment contracts or via a Collective Bargaining agreement. ENWIN's employment contracts and workplace policies are regularly reviewed to ensure compliance with applicable laws.

ENWIN also maintains a contract for service with The Windsor Utilities Commission (WUC). WUC was established as a public utility under the *City of Windsor (Amalgamation) Act, 1935* and continued as a local board under the *City of Windsor Act, 1936*. As a result, WUC derives some of its powers, authorities and privileges from the *Public Utilities Act* and the *Municipal Act, 2001*. WUC owns the City of Windsor Water Distribution System, which currently produces and distributes water to approximately 75,000 residential and commercial customers in Windsor, Ontario as well as LaSalle and Tecumseh, Ontario.

On November 6, 2012, WUC and ENWIN first entered into a Water System Operating Agreement (WSOA), whereby ENWIN agreed to provide services to WUC with respect to operating the water production and distribution systems. The services include management, administrative services, construction operations, and maintenance services. ENWIN is responsible for providing all personnel required to operate the water systems. As such, WUC has no employees or officers.

## Corporate Structure



The Managed Services are governed by the [Water System Control Agreement](#)

### b) Activities

ENWIN's mandate is to provide safe, reliable, efficient, and cost-effective delivery of electricity to the residents and businesses in its service territory, which is limited to the Windsor, Ontario, under a license issued by the Ontario Energy Board (OEB). As ENWIN is regulated by the OEB, all adjustments to its electricity distribution rates require OEB approval. ENWIN does not produce, manufacture, or import goods, though it purchases goods as described below.

WUC's mandate is to deliver clean, reliable, and safe water that enhances the quality of life of Windsor's residents and businesses. WUC produces and distributes water throughout Windsor, Ontario and to LaSalle and Tecumseh, Ontario. The importation of goods for WUC is limited to specific equipment for the distribution system. This equipment accounts for a small portion of overall purchase order spend and is mostly procured from the USA. WUC also purchases goods as described below.

### c) Supply Chains

#### ENWIN

In accordance with its mandate, ENWIN purchases electricity on behalf of its customers, and it purchases goods and services to build and maintain the distribution system that delivers electricity to its customers.

#### Distribution System

A high-level review of ENWIN's 2024 purchase order spend related to top Tier 1 suppliers shows that almost all goods and services that directly support the distribution system were purchased from suppliers operating in Canada. Moreover, of the goods that directly support



the distribution system, the majority of the purchase order spend was purchased from suppliers that manufacture the goods in Canada or the USA.

ENWIN did not conduct an analysis to identify components or raw materials used in the manufacturing process from these suppliers in 2024. However, ENWIN notes that the equipment and goods used in the distribution system require highly skilled labour to manufacture in accordance with applicable regulations and standards, which likely reduces the risk of forced or child labour in the production process.

### Electricity

The bulk electricity system in Ontario is broken into three main segments:

- 1) Generation: the production of electricity through the operation of nuclear, hydro, natural gas, solar, or wind, etc. facilities.
- 2) Transmission: the bulk movement of the electricity from the generating site along high-voltage power lines over long distances; and
- 3) Distribution: carrying the electricity from the transmission system to individual consumers.

The Independent Electricity Operator ("IESO") operates and monitors Ontario's electricity grid, directing the flow of electricity and balancing the hundreds of supply resources with demand. As the point of contact for electricity with the end-use customer, ENWIN invoices and receives revenue for the entire bulk electricity system, including generation, transmission, and distribution. However, the revenues collected for generation and transmission are remitted as a pass through (with no profit gained) to the corresponding entities via the IESO.

## **WUC**

Like ENWIN, most of the supply chain activities conducted for WUC are directed towards to procurement of goods and services that support the water production and distribution systems. Water production and distribution is a highly regulated industry, with goods and services that must meet stringent regulatory requirements.

The greatest portion of WUC's 2024 purchase order spend from top Tier 1 suppliers was related to the procurement of service providers for the construction and maintenance of the water distribution system, all of which were contractors with offices and employees located in Canada. A high-level review of 2024 purchase order spend from top Tier 1 suppliers indicates that the majority of WUC's purchase order spend was from suppliers in Canada and the USA.

## **2) Policies and Due Diligence Processes**

### **a) Internal**

**ENWIN** is committed to being a workplace that is trusted by employees, customers, and shareholders. In so doing, ENWIN encourages employee actions that align with its purpose, and takes steps to be a long-term community partner.

ENWIN strives to maintain a respectful workplace free from harassment and violence, including sexual harassment and sexual violence, discrimination and physical and psychological injury. We believe that all workplace incidents, illnesses, and environmental impacts are preventable, and that no task should be performed without first considering the health of employees and environmental impacts.

ENWIN is proactive in ensuring compliance with all applicable federal and provincial laws and regulations as a minimum standard. All employees are expected to comply with this commitment and all related laws, policies and procedures, including:

#### Laws and Regulations Thereunder

- *Employment Standards Act 2000*
- *Labour Relations Act, 1995*
- *Personal Information Protection and Electronic Documents Act*
- *Human Rights Code*
- *Occupational Health and Safety Act*
- *Education Act*

#### Internal Policies and Procedures

- Employee Code of Ethics and Conflict of Interest Policy
- Hiring Policy
- Respect in the Workplace Policy
- Health & Safety Policy
- Diversity, Equity, and Inclusion Policy
- Workplace Violence and Harassment Training
- Prevention of Violence in the Workplace Policy
- Accessibility (AODA) Policies
- Release of Personal and Employment Information Policy
- Compensation and Benefits Policy for Management and Non-Union Employees

In compliance with the above-noted laws, policies, and procedures, ENWIN's hiring practices also require the following:

- All external job opportunities are posted on a variety of website job boards, and on ENWIN's website, inviting candidates to apply.

- No one under the age of 16 will be employed, and students must be participating in supervised alternative learning programs or enrolled full time in a community college or university program.
- All required hours of work comply with the requirements of the *Employment Standards Act, 2000*.
- Employees are entitled to rearrange their work duties without loss of pay to observe the religious holiday(s) of their faith.
- Employees are offered sick leave, bereavement leave, pregnancy leave, parental leave, and family medical leave.

ENWIN strives to find prompt and equitable resolutions to all employee-related matters. In addition, about 61% of ENWIN employees are represented by the International Brotherhood of Electrical Workers Union (IBEW), which assists with finding prompt and equitable resolution of employment related complaints, grievances and disputes, promoting co-operation and understanding between the ENWIN and members of the bargaining unit, and participating in discussions and negotiations regarding the working conditions, wages, benefits and other employment-related matters.

In 2023, no specific training related to the *Act* was implemented within ENWIN or WUC. However, this has been identified as an area for development in future years.

## **b) External**

ENWIN and WUC strive to only work with suppliers and manufacturers that align with our key principles, behaviours, and core values. The current supplier contracts include provisions requiring suppliers to comply with applicable laws. Supply chain activities are consolidated with ENWIN, meaning that it is a single procurement team conducting activities on behalf of both entities, operating under the same policies and procedures.

Working to maintain an open and competitive purchasing environment, ENWIN has a Purchasing Policy in place to ensure reliable suppliers and contracts. The Purchasing Policy ensures that employees in the purchasing department are operating within guidelines towards the procurement of equipment in accordance with industry standards and regulations. Additionally, high value and/or complex procurements include robust vendor qualification processes, involving internal stakeholders, to ensure suppliers are appropriately vetted. Suppliers must demonstrate appropriate levels of qualification, internal controls, policies and procedures related to safety, personnel management, and compliance with applicable laws and regulations.

As noted above, ENWIN conducted a high-level review of its and WUC's 2024 purchase order spend from top Tier 1 suppliers. The review indicates that many of their top suppliers have Code of Conduct policies, ESG policies and other social responsibility policies that address fair working practices and address Forced Labour and Child Labour, both directly and indirectly within their policies. In many cases, these policies contain language that require adherence by their suppliers.



### 3. Risk of Forced Labour and Child Labour, Mitigation of the Risk

#### a) Internal

Given the adherence to laws, policies, and procedures set out above and applicable to its employees, ENWIN is confident that there is no forced labour or child labour related to its employees, all of whom work and reside in Ontario, Canada.

#### b) External

ENWIN often purchases finished products or electricity distribution equipment (equipment) that it then uses to assemble according to its own engineered designs to provide the service of electricity. The equipment and the assemblies of the equipment must be specifically designed for a few main factors:

- 1) Electricity is dangerous to everyone and anything that is near it.
- 2) Electricity is a necessary service that is relied on by every resident and business connected to the electricity system.
- 3) The electricity system is installed and operates in the public domain, overhead along the streets, highways, and underground of the streets and houses.

To deliver a safe, reliable system that will withstand the outside environment for many decades, most of ENWIN's equipment is designed to an industry specification and must meet performance tests as per an industry standard, such as those developed by the Canadian Standards Association. As a further step of due diligence, all equipment used in ENWIN's electricity distribution system is approved for use by a Professional Engineer as per O. Reg. 22/04 – Electrical Distribution Safety, which includes an annual audit on the approval process. Therefore, production of electricity distribution equipment requires high quality and precision, which is achieved with a manufacturing sector that has high skill, training, and labour rates, which likely reduces the risk of forced or child labour in the electricity sector.

WUC purchases finished products for the water distribution system. Like ENWIN, WUC operates in a highly regulated industry. Equipment and materials for the water distribution system must adhere to specifications, which are overseen by qualified engineers. The technical and complex nature of equipment and materials required for the water distribution system likely reduces the risk of forced and child labour in the industry. As it relates to the procurement of goods, services and the chemicals used in the distribution system from top Tier 1 suppliers, the majority of WUC's purchase order spend is from suppliers located in Canada and the USA.

The *Act* seeks to help eradicate forced or child labour contributions to the Canadian economy particularly in the areas of concern identified by the report *Ending Child Labour, Forced Labour and Human Trafficking in Global Supply Chains*<sup>1</sup>, including Africa, Asia, Latin America, and the Caribbean. A review of the equipment used by ENWIN and WUC in their distribution

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<sup>1</sup> International Labour Organization, Organisation for Economic Co-operation and Development, International Organization for Migration and United Nations Children's Fund, 2019

systems shows that, based on a high-level review of the 2023 purchase order spend from top Tier 1 suppliers, greater than 80% is supplied from Canada or the USA.

#### **4. Assessment of Effectiveness, Steps to Prevent and Reduce Risks of Forced Labour and Child Labour**

Based on the high-level review outlined above, ENWIN did not identify risks of forced or child labour in its or WUC's supply chain. However, ENWIN and WUC are committed to working collaboratively with their suppliers, along with industry stakeholders to better understand where there are risks, and where we need to make changes. ENWIN and WUC are committed to improving our practices to combat forced labour and child labour.

#### **5. Attestation**

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 Windsor Canada Utilities Ltd., ENWIN Utilities Ltd., and Windsor Utilities Commission.

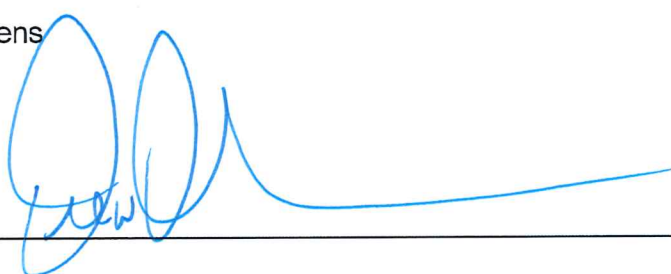
Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the *Act*, for the reporting year listed above.

Name: Mayor Drew Dilkens

Title: Board Chair

Date: April 23, 2025

Signature: \_\_\_\_\_



I have the authority to bind Windsor Canada Utilities Ltd.

Name: Garnet Fenn

Title: Board Chair

Date: April 23, 2025

Signature: \_\_\_\_\_



I have the authority to bind ENWIN Utilities Ltd.

Name: Councillor Kieran McKenzie

Title: Board Chair

Date: April 23, 2025

Signature:

A handwritten signature in blue ink, appearing to read 'Kieran McKenzie', is written over a solid black horizontal line. The signature is stylized with large loops and a long horizontal stroke extending to the right.

I have the authority to bind The Windsor Utilities Commission



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

### **Management Attestation**

1. Management conducted a high-level review of ENWIN Utilities Ltd.'s (ENWIN) 2023 purchase order spend by pulling purchase orders for 2024 and conducting research regarding the top suppliers, which consisted of approximately 80% of that spend.
2. Management conducted a high-level review of The Windsor Utilities Commission's (WUC) 2024 purchase order spend by pulling purchase orders for 2024 and conducting research regarding the top suppliers, which consisted of approximately 80% of that spend.
3. Management's reviews found that the majority of ENWIN's and WUC's 2024 spend related to goods and services that directly support the electricity and water distribution systems. With respect to goods, the majority were purchased from suppliers that operate and/or manufacture goods in Canada or the USA. With respect to services, the majority were purchased from suppliers with offices and employees in Canada.
4. Management conducted research regarding the top suppliers identified in its reviews. Management hereby confirms that many of the top suppliers have Code of Conduct policies, ESG policies and other social responsibility policies that address fair working practices and address forced and child labour, both directly and indirectly within their policies. In many cases, these policies contain language that require adherence by their suppliers.
5. Management hereby confirms that, based on the process and knowledge set out in this Management Attestation, the information set out in the 2024 Annual Report for Windsor Canada Utilities Ltd., ENWIN Utilities Ltd., and the Windsor Utilities Commission is true, accurate and complete for 2024 for the purposes of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

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Renee McIntyre  
Director Procurement and Supply Chain  
ENWIN Utilities Ltd.



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Matt Carlini  
Chief Financial Officer  
ENWIN Utilities Ltd.



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Garry Rossi  
President & CEO  
ENWIN Utilities Ltd.