

ONTARIO POWER GENERATION

2025 Report

in Respect of the *Fighting Against
Forced Labour and Child Labour
in Supply Chains Act*



Part 1 - Submission information

1. This report is for:

An entity.

2. State the legal name of reporting entity or government institution

Ontario Power Generation Inc. (“OPG”)

3. Reporting year

May 31, 2026.

4. Financial year covered by the report

This report covers activities over the period January 1, 2025 to December 31, 2025.

5. Is this a revised version of a report already submitted this reporting year?

No.

5.1. If yes, on what date was the original report submitted.

Not applicable.

5.1.1. Which part(s) of the original submission were updated? Select all that apply.

Not applicable.

5.1.2. Describe the changes made to the original submission, including the sections of the original report that were revised or any changes made to the questionnaire responses (3,000 character limit).

Not applicable.

6. For entities only: Business number(s) (if applicable):

OPG’s business number is 878664226.

7. For entities only: Is this a joint report?

Yes.

7.1 If yes, state the legal name of each entity covered by this report:

This joint report prepared by OPG covers its own actions and those of entities it controls. In addition to OPG, the parent company, this joint report covers the following subsidiaries (each individually a “Subsidiary” and collectively, the “Subsidiaries” for the purposes of this report):

- ▶ Atura Power (legal name: NV LP; includes Brighton Beach Power L.P. and Portlands Energy Centre L.P.)
- ▶ Lower Mattagami Energy Limited Partnership (LMELP)
- ▶ Lower Mattagami Limited Partnership (LMLP)
- ▶ Laurentis Energy Partners Inc. (LEP)

These Subsidiaries have substantially similar policies and due diligence processes in relation to forced labour and child labour as OPG and the information provided in this report generally applies to all entities covered in the report.

7.2 Identify the business number(s) of each entity covered by this report (if applicable).

NV L.P. - 290353408

Portlands Energy Centre L.P. – 121216485

Brighton Beach Power L.P. – 111116380

LMELP – 200659977

LMLP – 200660009

LEP – 816881288

8. For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?

No.

8.1 If yes, select the applicable law(s). Select all that apply.

Not applicable.

9. For entities only: Which of the following categories apply to the entity? Select all that apply.

- ▶ Listed on a stock exchange in Canada: No
- ▶ Canadian business presence (select all that apply):
 - Has a place of business in Canada: Yes
 - Does business in Canada: Yes
 - Has assets in Canada: Yes
- ▶ Meets size-related thresholds (select all that apply):
 - Has at least \$20 million in assets for at least one of its two most recent financial years: Yes
 - Has generated at least \$40 million in revenue for at least one of its two most recent financial years: Yes
 - Employs an average of at least 250 employees for at least one of its two most recent financial years: In the case of OPG, yes.

10. For entities only: In which of the following sectors or industries does the entity operate? Select all that apply.

Utilities.

11. For entities only: In which country is the entity headquartered or principally located?

Canada.

11.1 If in Canada: In which province or territory is the entity headquartered or principally located?

Ontario.

Part 2 - Annual Report

Reporting for entities

1. Which of the following accurately describes the entity's structure?

- ▶ OPG: Corporation
- ▶ Atura Power: Partnership
- ▶ Lower Mattagami Energy Limited Partnership: Partnership
- ▶ Lower Mattagami Limited Partnership: Partnership
- ▶ Laurentis Energy Partners Inc.: Corporation

2. Which of the following accurately describes the entity's activities? Select all that apply.

- ▶ Producing goods (includes manufacturing, extracting, growing and processing) in Canada: Yes
- ▶ Producing goods (includes manufacturing, extracting, growing and processing) outside Canada: Yes (OPG only)
- ▶ Importing into Canada goods produced outside Canada: Yes
- ▶ Controlling an entity engaged in producing goods, in Canada: Yes (OPG only)
- ▶ Controlling an entity engaged in producing goods, outside Canada: Yes (OPG only)
- ▶ Controlling an entity engaged in importing into Canada goods produced outside Canada: Yes (OPG only)

Additional information on the entity's structure, activities and supply chains

OPG is an Ontario-based company whose principal business is the generation and sale of electricity. OPG is a commercial enterprise incorporated under the Business Corporations Act (Ontario) and is wholly owned by the Province of Ontario. In 2025, OPG had more than 11,000 employees, the majority of whom were based in Ontario.

As at December 31, 2025, OPG had an in-service generating capacity of 18,096 megawatts, including two nuclear stations, 66 hydroelectric stations, two thermal stations, one solar facility and four combined cycle natural gas turbine plants in Ontario, Canada.

The combined cycle plants are owned and operated through OPG's subsidiary Atura Power based in Ontario, Canada.

OPG's subsidiary LEP, based in Canada, offers nuclear expertise in project management, engineering services, nuclear medicine and isotopes, asset refurbishments, and software and inspection technologies.

OPG's subsidiaries, LMELP and LMLP, based in Ontario, Canada, own and operate certain hydroelectric facilities located along the Lower Mattagami River in Ontario.

OPG's CEO and executive team lead and establish chain of command within operations, projects, and corporate support business units across the enterprise.

In 2025, OPG worked with approximately 1,700 suppliers and procured approximately five billion dollars in materials and services, with more than 90% procured from Canadian suppliers for OPG's nuclear and hydroelectric business.

OPG has a line of sight into the country of origin in respect of certain goods that OPG procured in 2025. For example, OPG procured uranium from mines in Canada, Uzbekistan, Kazakhstan, South Africa, Ukraine, and Australia, and sustainability considerations were a key part of the selection process for new uranium procurements.

In 2025, OPG took steps to increase visibility of business activities in its supply chain, which includes direct and indirect suppliers, both within and outside of Canada, including by adding several suppliers to the EcoVadis IT platform (“EcoVadis”) to conduct due diligence through its value chain, as described in OPG’s response to question #8, and by issuing a survey to key suppliers to aid OPG in identifying high-risk source countries, or regions of origin, of each of the goods and services used in OPG’s supply chain. OPG’s work to increase visibility in this regard will continue in 2026.

3. What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply.

- ▶ Conducting an internal assessment of risks of forced labour and/or child labour in the organization’s activities and supply chains
- ▶ Contracting an external assessment of risks of forced labour and/or child labour in the organization’s activities and supply chains
- ▶ Developing and implementing an action plan for addressing forced labour and/or child labour
- ▶ Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- ▶ Addressing practices in the organization’s activities and supply chains that may cause or contribute to the risk of forced labour and/or child labour
- ▶ Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization’s activities and supply chains
- ▶ Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- ▶ Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- ▶ Developing and implementing child protection policies and processes
- ▶ Developing and implementing anti-forced labour and/or -child labour contractual clauses
- ▶ Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- ▶ Monitoring suppliers
- ▶ Developing and implementing training and awareness materials on forced labour and/or child labour
- ▶ Developing and implementing procedures to track performance in addressing forced labour and/or child labour
- ▶ Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

4. Please provide additional information describing the steps taken (if applicable) (3,000 character limit).

In 2025, OPG took the following steps, which applied broadly to the company's activities and supply chains, and were intended to address both forced labour and child labour:

- ▶ OPG's contract standards continued to require all suppliers who provide goods and/or services to OPG to comply with OPG's Supplier Code of Conduct ("Supplier Code"). OPG's Supplier Code requires compliance with all applicable labour and employment laws and requires that suppliers be able to demonstrate that no child labour or forced labour is used by suppliers and ensure that their subcontractor arrangements comply with the Supplier Code. See: <https://www.opg.com/documents/supplier-code-of-conduct-pdf/>
- ▶ OPG continued to require all employees to comply with OPG's Code of Business Conduct ("OPG Code"), which requires employees who become aware of conduct by suppliers that violate or appear to violate the OPG Code or the Supplier Code to report this to management. See: <https://www.opg.com/document/opg-code-of-business-conduct/>
- ▶ OPG continued to implement a whistle-blower program with a confidential reporting portal for employees and members of the public to report known or suspected OPG Code violations.
- ▶ OPG continued to utilize EcoVadis to conduct due diligence through its value chain, as described in OPG's response to question #8. See: <http://www.ecovadis.com/>
- ▶ Greater than 80% of OPG employees are represented by various unions, providing significant protection against the risk of forced labour and child labour.
- ▶ OPG continued hiring practices that complied with the *Employment Standards Act, 2000* (Ontario). The parent company maintained hiring records and a comprehensive security clearance program.

5. Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?

Yes.

5.1 If yes, which elements of the policies and/or due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply.

- ▶ Embedding responsible business conduct into policies and management systems: Yes: See OPG's response to question #4 regarding OPG's Supplier Code, OPG Code, OPG's whistle-blower program, and OPG's hiring and security clearance program.
- ▶ Identifying and assessing potential and adverse impacts in operations, supply chains and business relationships: Yes: See OPG's response to question #8 regarding the use of EcoVadis to assess adverse impacts.
- ▶ Ceasing, preventing or mitigating potential and actual adverse impacts: Yes: See OPG's response to question #3 and #4.
- ▶ Tracking implementation and results: Yes: OPG tracked implementation and results by assessing effectiveness in ensuring that forced labour and child labour are not being used in OPG's business and supply chain, as described in OPG's response to question #12.1.
- ▶ Communicating how impacts are addressed: Yes: This is reflected in OPG's communication of corrective actions specified to suppliers, as described in OPG's response to question #8.
- ▶ Providing for or cooperating in remediation when appropriate: Not applicable

6. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?

Yes, we have identified parts of our activities and/or supply chains that carry risks to the best of our knowledge and will continue to identify emerging risks.

6.1. If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.

- ▶ Tier one (direct) suppliers: OPG identified that a small number of its suppliers have an opportunity to strengthen written policies and procedures related to forced and child labour as described in OPG's response to question #8. OPG subsequently specified corrective actions for these suppliers related to strengthening these written policies and procedures, and these corrective actions were completed in 2025.

7. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply.

Utilities

8. Please provide details on the parts of the entity's activities and supply chains where the entity has identified a risk of forced labour or child labour and describe the actions taken to assess and manage those risks (if applicable) (3,000 character limit).

In 2025, OPG conducted a risk assessment into the areas within its supply chain that carry a risk of forced labour or child labour using EcoVadis. OPG uses EcoVadis to evaluate key suppliers on environmental performance, ethics, sustainable procurement, and labour and human rights, including forced labour and child labour.

OPG's assessment identified that five suppliers have an opportunity to strengthen policies and procedures addressing forced labour and child labour. This assessment was in respect of written policies and procedures only and not an assessment of the suppliers' activity or conduct. All five suppliers are based in North America and are tier 1 (direct) suppliers to OPG involving manufacturing, oil and gas, construction, and maintenance services. OPG specified corrective actions for these suppliers in respect of strengthening their written policies and procedures, and these corrective actions were completed in 2025.

OPG also continued to onboard additional suppliers to EcoVadis in 2025 and this work will continue in 2026.

9. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

9.1. If yes, which remediation measures has the entity taken? Select all that apply.

Not applicable.

10. Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains?

Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

11. Does the entity currently provide training to employees on forced labour and/or child labour?

Yes.

11.1. If yes, is the training mandatory?

Yes, the training is mandatory for some employees (Supply Chain procurement agents and line management). The team members required to complete this training are those directly involved in procurement and placing purchase orders. This training is part of OPG's supply chain qualifications, and there is a requirement to complete it every two years to remain current on the issue.

In 2025, 100% of procurement staff at OPG and its Subsidiaries who were required to complete the training did so. OPG provided web-based training through EcoVadis, focusing on forced labour and child labour. The training included a test of the course material.

12. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?

Yes.

12.1 If yes, what method does the entity use to assess its effectiveness? Select all that apply.

- ▶ Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour.
- ▶ Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators.

Additional information on how OPG assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains

OPG has established a monthly meeting for Supply Chain management to review progress against an annual scorecard, which includes oversight of the organization's policies and procedures related to forced and child labour and tracking relevant key performance indicators.

In addition, on an ongoing basis, OPG considers the effectiveness of the steps it has taken to ensure forced and child labour are not being used in its business and supply chains. To inform this non-formalized assessment approach, OPG monitors whether any instances of forced and child labour in OPG's business and supply chain have arisen or whether there are opportunities to further reduce or prevent forced labour and child labour-related risks. To this end, OPG obtains information through various channels including:

- ▶ OPG's whistle-blower program;
- ▶ OPG's direct engagement with suppliers through its procurement processes as well as engagement with suppliers through EcoVadis;
- ▶ OPG's direct interaction with staff as well as through a joint working committee and/or grievance-related processes in accordance with OPG's collective bargaining agreements;
- ▶ processes used to identify organizational risks as part of OPG's Enterprise Risk Management program;
- ▶ OPG's participation in industry associations such as Nuclear Procurement Issues Corporation (NUPIC); and
- ▶ OPG's scanning of applicable media reports.

OPG also regularly reviews and updates codes, policies, and procedures for various reasons, including to address risks related to forced labour and child labour.

This report has been approved by the OPG Board of Directors.

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, I, in the capacity of Board Chair, attest that I have reviewed the information contained in the report on behalf of OPG's Board of Directors for the entities listed above. 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 within this report.



Wendy Kei

Board Chair

I have the authority to bind Ontario Power Generation Inc.

Date: May 7, 2026



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