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## ***FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT***

### ***2023 REPORT***

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#### **1. INTRODUCTION**

This report (the “Report”), in respect of the financial year ended March 31, 2024, is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)* (the “Act”) has been prepared jointly by AECO Gas Storage Partnership (“AECO”), Access Gas Services Inc. (“AGS”) and Access Gas Services (Ontario) Inc. (“AGS ON”). In this Report, AECO, AGS and AGS ON are collectively referred to as “Reporting Entities” and references to “we”, “us” or “our” are to the Reporting Entities. The Business Numbers of each Reporting Entity is as follows:

- AECO Gas Storage Partnership BN: 82104 8949
- Access Gas Services Inc. BN: 83888 6521
- Access Gas Services (Ontario) Inc. BN: 84542 1494

We are committed to working in a responsible manner, one that prioritizes the well-being and protection of our workers, the public, and the environment. We operate our facilities in a manner that respects the health and safety of our employees, contractors, customers, communities, and the environment in which we operate. We believe that the health, safety, and wellbeing of our employees, contractors, customers, and the public are the highest priority. It is our goal and objective to operate our business in such a way as to prevent harm to people and to protect the environment. We comply with all applicable health, safety, human rights and environmental laws and regulations.

## **2. OUR COMMITMENT**

We are committed to conducting business in an ethical and responsible manner, including by carrying out our activities in a manner that respects and supports the protection of human rights, including but not limited to:

- a. operating with leading health and safety practices to support the goal of zero serious safety incidents;
- b. Striving to ensure that the interests, safety and well-being of the communities in which we operate are integrated into our business decisions;
- c. the elimination of discrimination in employment;
- d. the prohibition of child and forced labour; and
- e. the eradication of harassment and physical or mental abuse in the workplace.

We strive to embed these standards into all of our core business activities, including training, communications, contracts and due diligence processes as appropriate. These practices extend to our interactions with our key suppliers and other business partners.

## **3. OUR BUSINESS**

AECO is headquartered in Calgary, Alberta. In Alberta, AECO owns and operates the AECO Hub™, comprised of the Suffield and Countess gas storage facilities.

AECO provides natural gas storage services as well as actively buys and sells natural gas throughout Canada.

AECO is the parent company of both AGS and AGS ON which provide natural gas supply and related services to customers throughout Canada.

We have centralized corporate and administrative functions that provide governance, financing, procurement, and other support to its business including those Reporting Entities covered by this Report.

## **4. OUR SUPPLY CHAIN**

The supply chain and procurement team is a centralized function that supports our operations across Canada. Our supply chain includes various vendors, suppliers, contractors, and subcontractors involved in the procurement of goods and services necessary for our operations in developing and maintaining our assets and the services we provide. In total, we procure goods and services from approximately 225 suppliers

and contractors. We employ the services of Complyworks, a third party vendor used to manage various risks and compliance requirements within our supply chain to ensure we contract only with suppliers who meet our qualification standards and corporate requirements.

## **5. OUR POLICIES AND DUE DILLIGENCE**

All of our contractors and their subsidiaries are required to adhere to our comprehensive corporate policies in providing goods and services to all of our subsidiaries and affiliate including the Reporting Entities. Each policy is posted on our external website for all contractors to access. Failure to adhere to our policies may result in the contractor's services being terminated. Our Code of Business Conduct and Ethics Policy addresses Human Rights and Modern Slavery and our commitment to conducting business in an ethical and responsible manner. We intend to review our policies annually to ensure measures are in place to mitigate such risks and that any forms of forced labour or child labour are addressed. We are committed to continuously evolving and improving our policies and practices and strive to make every effort to prevent our activities from having a negative impact on human rights.

We expect all of our contractors to adhere to business principles and values similar to our own and to comply with all laws, regulations and best practices. Before making any commitments towards third parties, Complyworks assists us by evaluating the relationship and mitigating any associated risks by carrying out risk-based due diligence and checks to identify high risk suppliers in various areas, including forced labour, child labour or other human rights violations.

## **6. ASSESSING OUR RISK**

In assessing the risk of forced and child labour in our business and supply chains, we rely heavily on Complyworks, an external risk management and compliance service provider who utilizes a variety of metrics and questionnaires to assess our risk within the procurement process. We acknowledge that our exposure to the risk of forced labour and/or child labour increases when we engage with third parties in high-risk countries or categories such as protective equipment and garment production and to the extent possible we attempt to source locally produced products.

## **7. REMEDIATION MEASURES**

Upon an initial assessment of our operations and suppliers, we have not identified any incidences of forced labor or child labor within our supply chain. Therefore, we have not taken any measures to remediate any forced or child labour incidents or any loss of

income to the most vulnerable families that results from any measures taken to eliminate such incidents. We acknowledge the importance of ongoing monitoring to ensure that risks surrounding forced and child labour remain mitigated within our operations and supply chains. We are committed to regularly reviewing policies and implementing any necessary remediation measures should the need arise in the future. Our Code of Business Conduct and Ethics and our Whistleblower Policy require all our employees and contract workers to report actual or suspected misconduct in all areas.

## **8. TRAINING**

Our personnel at all levels are required to adhere to all corporate policies as well as participate in an annual online training session in respect of our Code of Business Conduct and Ethics, as well as Anti Bribery and Corruption Program to ensure that it is understood and properly applied to their daily activities. Additionally, all employees are informed, encouraged and expected to report wrong-doing or suspicious activities under those policies.

## **9. EFFECTIVENESS**

As part of our ongoing commitment to a safe and fair workplace, we monitor compliance with our policies on an ongoing basis and review any concern which might be brought to our attention by either employees, contractors or service providers. To date no significant concerns or complaints relating to forced labour or child labour have been identified. We regularly review our policies and processes to ensure effectiveness and meet with the representatives of Complyworks on a regular basis to ensure that all of our suppliers/vendors are compliant as well as to ensure the measures being taken by Complyworks on our behalf continue to meet our needs and the evolving risks of our operations.

## **10. APPROVAL & SIGNATURE**

This Report has been approved by the board of directors of each Reporting Entity on May 21, 2024, in accordance with Section 11(4)(b)(i).

It has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This report will be available on our internal website as well as our external website at [www.rockpointgs.com](http://www.rockpointgs.com).

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 the Reporting

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 above.



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Tobias (Toby) J. McKenna

Authorized Signatory

Date: May 21, 2024

*I have the legal authority to bind all Reporting Entities.*