

REPORT

Fighting Against Forced Labour and Child Labour in Supply Chains Act

Joint Report Pursuant to the Fighting Against Forced
Labour and Child Labour in Supply Chains Act



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Oneida – Canadian Battery Energy Storage

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About this report

This is a joint report by Northland Power Inc. and certain of its subsidiaries (see Appendix), each of which is directly or indirectly controlled by Northland Power, in order to comply with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) for the reporting period covering January 1 to December 31, 2024. Note that the contents of this report and the policies described herein are applicable to Northland and its subsidiaries as a whole.

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Structure, activities and supply chains

Structure and Activities

Northland Power is a global power producer dedicated to accelerating the global energy transition. Founded in 1987, with almost four decades of experience, Northland has a long history of developing, building, owning and operating a diversified mix of energy infrastructure assets including offshore and onshore wind, solar, natural gas and battery energy storage. Northland also supplies energy through a regulated utility.

Headquartered in Toronto, Canada, today Northland has global offices in seven countries. As of December 31, 2024, Northland owns or has an economic interest in 3.2 GW of gross operating generating capacity, 2.4 GW under construction and a significant inventory of early to mid-stage development opportunities encompassing approximately 10 GW of potential capacity.

Northland has been publicly traded since 1997, and our common shares trade on the Toronto Stock Exchange under the symbol NPI. As of December 31, 2024, Northland had a total of 1,219 employees globally, working out of the Toronto head office and at our various global offices, project sites and operating facilities.

Northland’s business has evolved since its origins, from supporting Canada’s transition away from coal with biomass and natural gas to our present portfolio of diversified global energy assets. Northland operates under a structure comprised of three distinct business units (BUs), each focused on a specific generating technology:

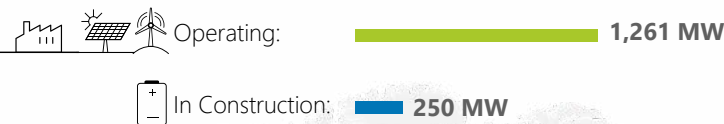
1. Onshore Renewables
 - Solar PV
 - Onshore wind
 - Concentrated solar
 - Battery storage
2. Offshore Wind
3. Natural Gas & Utilities



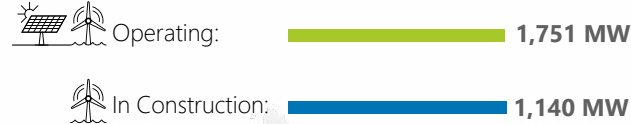
Baltic Power Offshore
Substation Delivery

Our Global Footprint

Canada:



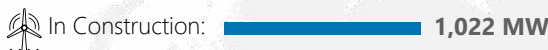
Europe:



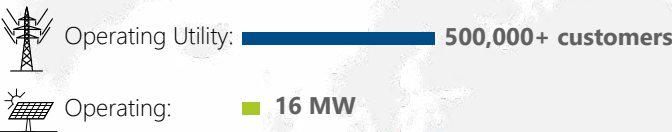
United States:



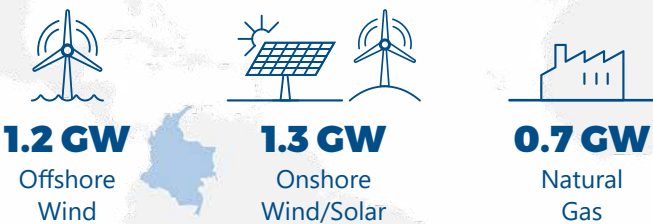
Taiwan:



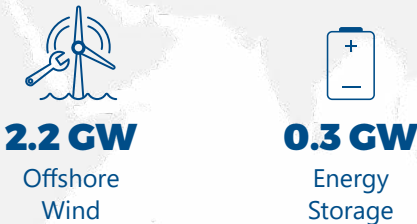
Colombia:



Operating Assets (Gross)



Assets Under Construction (Gross)



Jacket manufacturing facility in Taiwan



Governance

The Board of Directors at Northland is committed to maintaining high standards of governance and overseeing the company’s efforts to provide reliable, affordable energy while creating long-term value for shareholders. Northland continuously improves its policies and practices on human rights, health, safety, climate change, and environmental risks. The Board, through its committees, ensures compliance with key policies such as the Human Rights Policy, Code of Business Conduct and Ethics, Anti-Bribery and Corruption Policy, and others. Northland’s management, guided by the Board, also supports ethical behavior through initiatives like employee onboarding, policy updates, and annual training on key corporate policies.



Supply Chains

Each year, Northland partners with suppliers and vendors globally. It is crucial for us to clearly communicate our Environmental, Social, and Governance (ESG) values across this entire supplier network. While our largest suppliers mainly support our construction efforts, we also maintain long-term contracts for operations, maintenance, and corporate services throughout our value chain. As a project-based business, our suppliers often change from year to year, and capital expenditures vary depending on project needs, which makes year-over-year comparisons less effective. Our global supply chain spans Asia, Europe, and North America, and focuses on procuring capital goods for sustainable infrastructure projects, including wind turbines, towers, foundations, installation vessels, cables, substations, batteries, solar panels, inverters, and trackers. Certain areas of our business and supply chain, such as production, manufacturing, construction activities, and mineral sourcing, may present risks related to forced or child labour.

In 2024, mid-stage construction continued on the battery storage project in Canada and the offshore wind projects in Poland and Taiwan, with focus on:

Offshore Wind

- Fabrication of the wind turbine foundations, onshore and offshore substations
- Fabrication of multiple turbine components, export cables and inter-array cables
- Installation of pin piles and turbine jacket foundations

Battery Storage

- Finalizing civil works
- Receiving major equipment
- High voltage substation construction
- Cabling leading up to commissioning

As of 2024 and throughout the construction of these assets, the suppliers will manufacture the main components required in the following countries:

- In the case of wind turbine and associated components manufacturing, Germany, United Kingdom, Denmark, Spain, Poland, Slovenia, Belgium, Italy, Turkey, France, Finland, Brazil, United States, Czech Republic, Taiwan, Vietnam, and South Korea
- In the case of battery storage manufacturing, China

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Our vision

At Northland, our mission is to lead the world in developing energy assets. We create lasting socio-economic value in the communities we serve, helping local markets transition towards a carbon-neutral future while minimizing our environmental impacts through delivering clean, reliable and affordable energy.

For additional information on Northland's business please refer to our [Annual Report](#) and [Sustainability section](#) of our website.

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Steps taken to prevent and reduce risk of forced labour and child labour

In 2024, Northland conducted reasonable due diligence and put in place policies and procedures to identify and understand risks within our supply chain. By collaborating across departments and engaging with our suppliers, vendors, and contractors, we worked to manage and mitigate identified risks through various strategies. In general terms, Northland took the following steps in 2024 to prevent or reduce the risk of forced labour in its supply chains:

- Continued to implement our Human Rights Policy and Standard Operating Procedure;
- Continued to engage with key suppliers on ESG performance and onboard suppliers into our EcoVadis network;
- Conducted mandatory training on modern slavery and human rights for all Northland employees;
- Conducted mandatory training on our Anti-Bribery and Corruption Policy and Whistleblower Policy; and
- Began Social Impact Assessments for two development projects.

Details of these actions are described throughout this Report.



Hai Long - Taiwan

5 Policies and due diligence

Northland takes a proactive approach to identifying risks within our value chain by conducting thorough due diligence of suppliers, vendors and contractors prior to, and in parallel with, negotiating contractual agreements. We also utilize contract terms to ensure continued compliance with Northland's policies and expectations. We conduct reviews throughout the project life cycle, from initial market analysis to supplier due diligence and monitoring. We work with our partners and suppliers to promote greater transparency and minimize the risk of violation of our policies and codes of conduct.

Key Policies and Documents

Our policies apply to internal activities and conduct, our work with partners in communities where we conduct business, and to activities within our value chain, including, but not limited to, prohibiting the use of forced labour and/or child labour. Our policies maintain that all employees and contractors have the right to equal employment opportunities, freedom of association, dignity, privacy, and the right to safe and fair work without fear of discrimination or violence based on ethnic background, culture, religion, sexual identity or orientation, race, gender, ability or other factors.

In 2024 we were also a signatory to the United Nations Global Compact, committing to applying its 10 principles in the areas of human rights, labour, environment and anti-corruption in our strategy, culture and everyday business.

[Human Rights Policy](#)

Introduced in 2023, our Human Rights Policy outlines Northland's governance and due diligence process to identify and mitigate risk of human rights violations within our business and supply chain. This policy states Northland's commitment to upholding human rights in accordance with the United Nations (UN) Guiding Principles on Business and Human Rights and other international laws and standards.

[Global Code of Business Conduct and Ethics](#)

Northland's global Code of Business Conduct and Ethics (the "Code") applies to employees, officers, directors, consultants and representatives of Northland. It provides guidelines with respect to conflicts of interest, respect in the workplace, social responsibility, human rights, diversity, compliance with laws and Northland's commitment to ethical and honest conduct. All employees sign the Code during the onboarding process and are informed of changes and updates on an annual basis.

[Global Anti-Bribery and Corruption Policy](#)

Northland's Global Anti-Bribery and Corruption Policy sets out our zero-tolerance approach to bribery and corruption and complements the Code. This policy reiterates our commitment to conducting business in an ethical manner, with integrity and transparency, and creates reporting obligations with respect to gifts, donations / community investments and meetings with public officials.

[Supplier and Partner Code of Conduct and Ethics](#)

We expect our partners, suppliers and vendors to adhere to our Supplier and Partner Code of Conduct and Ethics, requiring that they comply with applicable laws, uphold our values in respecting the highest standards of health and safety, environmental management, human rights and labour rights, and that they act with transparency, integrity and respect. Our Supplier and Partner Code of Conduct and Ethics is both a business agreement and social contract to help guide our partner and supplier relationships. It helps mitigate risks and lays the foundation for honest and transparent relationships built on accountability and shared responsibility.

[Global Whistleblower Policy](#)

Northland's Whistleblower Policy enables employees, other stakeholders and third parties to safely report actual or suspected misconduct or actions that violate the law or our Code of Business Conduct and Ethics without fear of retaliation.

[Our Commitment to Diversity, Inclusion and Belonging](#)

Our Commitment to Diversity, Inclusion and Belonging describes six key pillars to uphold across the business to ensure diversity and inclusiveness remain at the core of who we are and how we operate. We strive to foster an environment that is inclusive and where people of all backgrounds and abilities are respected and valued.

[Our Commitment to Local Communities and Indigenous People](#)

We take pride in our approach to establishing, building, and cultivating strong, mutually beneficial relationships to garner trust and support from local communities. This enables us to develop, construct and operate our projects while acting as trusted partners to local and Indigenous communities.

Due Diligence and Risk Management

As we grow and expand into new markets, we analyze any heightened risk of human rights issues, including forced labour and child labour. We are committed to mitigating and managing these risks for our people, our communities and within our business. As described above, our policies guide how we conduct business with our employees, and external groups in which we work with, such as our suppliers, vendors and contractors.

When relevant, Northland completes assessments of potential adverse human rights impacts and social impacts, in accordance with the Equator Principles, International Finance Corporation Performance Standards and World Bank Industry Sector Guidelines.

The following describes the tools and mechanisms we use to identify and manage ESG-related risks within our supply chains:

Digital Software

Northland utilizes a digital tool to conduct Requests for Information (RFIs) and Requests for Proposals (RFPs) in a consistent manner. This tool supports Northland in conducting pre-qualification screenings for potential suppliers and requesting information on an organization's ESG practices, including but not limited to human rights. This tool is currently being rolled out across the organization for new projects.

Pre-qualification Questionnaires and Requests for Information

Northland uses a pre-qualification questionnaire to gather information from potential suppliers on ESG programs, including policies and procedures around human rights. These questionnaires or RFIs inform where further due diligence measures may be required, or contractual safeguards may be implemented.

EcoVadis

In 2022, Northland partnered with EcoVadis, a provider of business sustainability ratings, intelligence, and collaborative performance improvement tools for global supply chains. This partnership has become an important part of how we evaluate and onboard our suppliers. EcoVadis provides an actionable sustainability scorecard that arms us with detailed insight into environmental, social and ethical risks including within our global suppliers. Due to the dynamic nature of our business we can face challenges in building long-term engagement with past suppliers, including incorporating suppliers in the EcoVadis system or obtaining their

signoff on our Supplier and Partner Code of Conduct and Ethics. We encourage new suppliers to join EcoVadis to share our commitment to sustainability and build a more responsible value chain. If EcoVadis is not an option for a potential supplier, we request documentation on sustainability practices, policies and commitments to complete our own screening of ESG performance, including human rights. Supplier engagement and building longer-term relationships to effect sustainability improvements continue to be a priority for Northland.

Dow Jones

Northland utilizes the Dow Jones RiskCenter as a tool during our due diligence of suppliers. This tool helps to identify risks associated with a potential supplier as it relates to ethics, anti-bribery and corruption.

Social Impact Assessments

Northland works with trusted third-party experts to conduct Social Impact Assessments on development projects to understand the baseline social conditions of a project area and the potential impacts of a project on the local community. These assessments include understanding the labour conditions, and the likelihood of forced labour and/or child labour being associated with a project. These assessments are a tool in the due diligence process help identify and develop mitigation measures for a project as needed.

Human Rights Assessments

Similar to how we conduct Social Impact Assessments, a Human Rights Assessment may be conducted at the project-level when applicable. This type of assessment helps to identify and inform preventative and/or mitigative measures for human rights-related risk within a project, including its supply chain.

Contractual Agreements or Terms and Conditions

Northland's Legal department has created template terms and conditions to include in agreements with suppliers, vendors, and contractors. These terms help ensure compliance with our Supplier and Partner Code of Conduct and Ethics and address any concerns identified during due diligence, such as forced or child labour. In 2024, we continued to assess our suppliers and potential suppliers using the tools mentioned earlier, while looking for ways to further improve our practices for identifying and understanding supply chain risks.

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Remediation

Northland is committed to addressing any incidents within our operations, communities or supply chain. We have local grievance mechanisms in place at all project stages, from construction to operations. Our Whistleblower Policy applies to all employees, officers, directors, contractors, suppliers, and third-party community members. We investigate all allegations and protect those who report in good faith from retaliation, with all reports being presented to the Audit Committee of the Board. This policy encourages employees to uphold the highest standards of business and personal ethics.

Northland has not identified any instances of forced or child labour in its activities or supply chains, nor have we found any loss of income for vulnerable families related to efforts to eliminate such practices. As a result, no remediation actions have been necessary to date. However, Northland will continue to assess its activities and supply chains and take appropriate remediation steps if forced or child labour are identified.

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Training

Modern Slavery Training

To support further awareness and accountability for our commitment, in 2022, we launched our first mandatory training on Modern Slavery and Human Rights developed by an external provider. This training focuses on providing Northland employees with an overview of modern slavery, its global prevalence, and how to combat it through proper business practices. The mandatory training includes an overview on supplier due diligence, highlighting the importance of early detection of human rights risks within the supply chain. In 2024, we continued this annual training program.

Anti-Bribery and Corruption Policy

In 2024, we conducted mandatory training on our Anti-Bribery and Corruption Policy.

Whistleblower Policy

In 2024, we conducted mandatory training on our Whistleblower Policy for all Northland employees.

EcoVadis Training

Since partnering with EcoVadis, Northland has worked with their team to conduct training for our Procurement and ESG employees globally. This training is led by EcoVadis personnel and describes how and why EcoVadis is a valuable tool and how to engage suppliers on joining this platform.



Northlanders brainstorming ideas

Measuring effectiveness

Northland reviews its policies annually, and the Governance and Nominating Committee of the Board recommends updates as needed to ensure compliance with best practices and regulatory requirements. At the project level, our international projects under construction, such as Hai Long and Baltic Power, are audited every two years for environmental and social compliance. These audits help identify any non-conformities or areas for improvement in meeting our environmental and social commitments. Apart from these audits, no additional actions have been taken to assess the effectiveness of preventing and reducing forced or child labour risks in our supply chains.

Forward-looking information

This report contains statements that constitute forward-looking information within the meaning of applicable securities laws ("forward-looking statements"), including, in particular, statements regarding Northland's operations and operating capacity, human rights commitments, policy development and governance practices, training practices and programs, statements with respect to suppliers, vendors and/or contractors and their continued compliance with Northland's codes, policies and contract terms, Northland's ability to meet its proposed objectives and any other statements regarding events or developments that Northland believes or anticipates will or may occur in the future. Northland's actual results could differ materially from those expressed in, or implied by, these forward-looking statements and, accordingly, the events anticipated by the forward-looking statements may or may not transpire or occur. Forward-looking statements include statements that are not historical facts and are predictive in nature, depend upon or refer to future events or conditions, or include words such as "expects," "anticipates," "plans," "predicts," "believes," "estimates," "intends," "targets," "projects," "forecasts" or negative versions thereof and other similar expressions or future or conditional verbs such as "may," "will," "should," "would" and "could."

These statements are based upon certain material factors or assumptions that were applied in developing the forward-looking statements, including the provisions of contracts to which Northland or a subsidiary is a party, management's current plans and its perception of historical trends, current economic conditions and expected future developments, as well as other factors, estimates and assumptions that are believed to be appropriate in the circumstances. Although these forward-looking statements are based upon management's reasonable expectations and assumptions as of the date of this report, they are subject to numerous risks and uncertainties. Some of the factors that could cause results or events to differ from current expectations include, but are not limited to the risk of receiving untruthful or deceptive information from suppliers, vendors and/or contractors, the risk of changes to Northland's supply chain as a result of changes to project needs or the availability of materials or inputs, regulatory or policy changes, and the other factors described in the "Risks Factors" section of Northland's Annual Information Form for the year ended December 31, 2024, which can be found at www.sedarplus.ca under Northland's profile and on Northland's website at northlandpower.com.

The forward-looking statements contained in this report are, unless otherwise indicated, stated as of the date hereof and are based on assumptions that were considered reasonable as of the date hereof. Other than as specifically required by law, Northland undertakes no obligation to update any forward-looking statements to reflect events or circumstances after such date or to reflect the occurrence of unanticipated events, whether as a result of new information, future events or results, or otherwise.

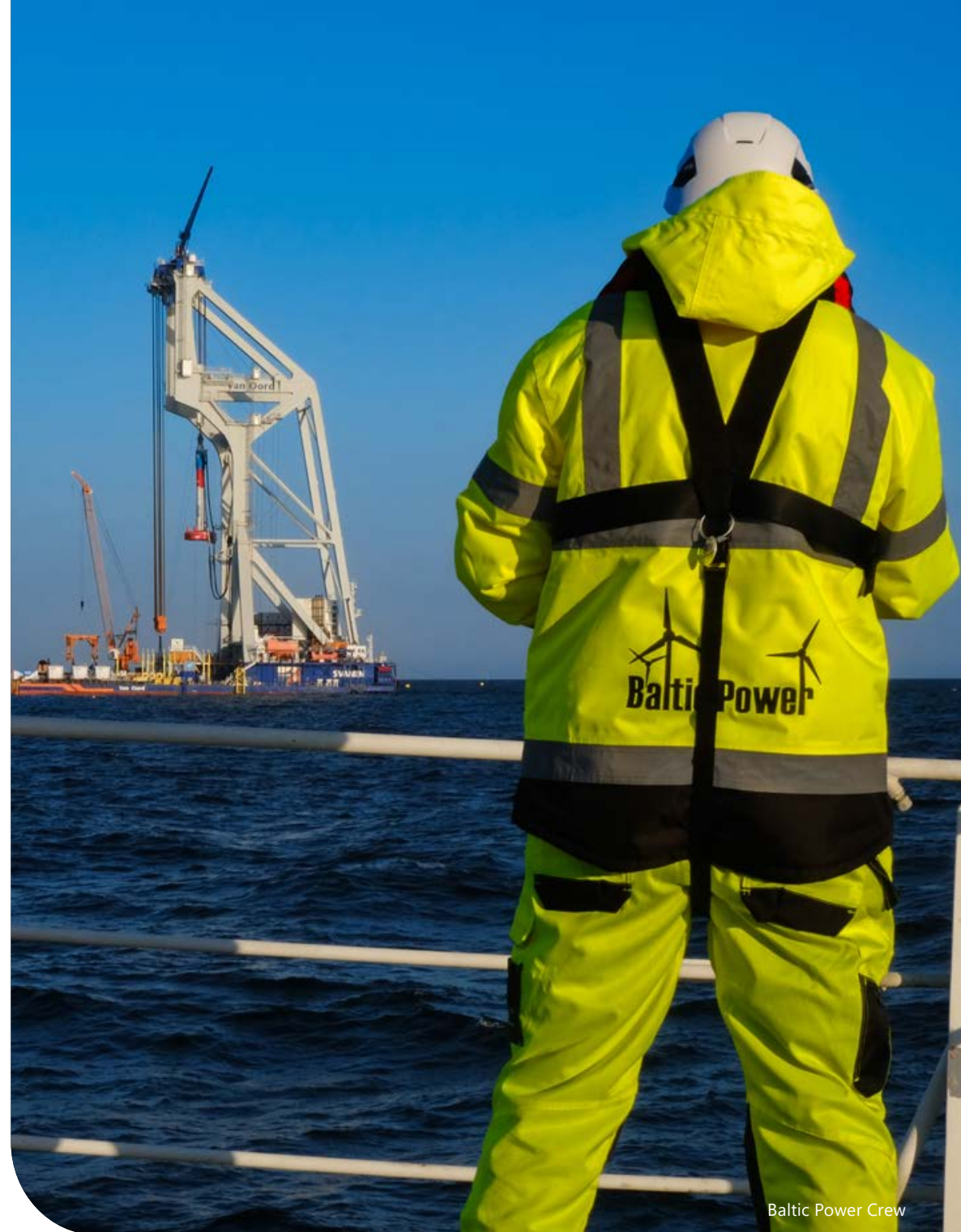
Approval and attestation

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 the entity or 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.



Christine Healy,

President & CEO



Baltic Power Crew

Appendix

- Oneida Store LP, by its managing general partner, Oneida Storage GP Inc.
- Northland Power Services Inc.
- Northland Power Renewable Energy Centre Inc.
- NP Development Holdings Inc.
- Northland Power Properties Inc.
- Northland Power Construction Services Inc.
- Northland Power Development Services Inc.
- Southwest Energy Storage, by its general partner, Southwest Energy Storage GP Inc.
- Marmora Power L.P., by its general partner, Marmora Power GP Inc.
- 2539613 Ontario Inc.
- McLean's Mountain Wind Limited Partnership, by its managing general partner, Northland Power Inc.
- Grand Bend Wind Limited Partnership, by its managing general partner, Grand Bend Wind GP Inc.
- Saint-Ulric Saint-Leandre Wind L.P. / Eoliennes Saint-Ulric Sain Leandre S.E.C., by its managing general partner, NPI Wind Power GP I Inc.
- Mont-Louis Wind L.P. / Eoliennes Mont-Louis S.E.C., by its managing general partner, NPI Wind Power GP II Inc.
- Thorold Cogen L.P., by its managing general partner, Northland Power Thorold Cogen GP Inc.
- Spy Hill Power L.P., by its managing general partner, Spy Hill Power GP Inc.
- North Battleford Power L.P., by its managing general partner, North Battleford Power GP Inc.
- Kirkland Lake Power Corp.
- Northland Power solar Crosby L.P., by its managing general partner, Northland Power Solar Crosby GP Inc.
- Northland Power Solar McCann L.P., by its managing general partner, Northland Power Solar McCann GP Inc.
- Northland Power Solar Rideau Lakes L.P., by its managing general partner, Northland Power Solar Rideau Lakes GP Inc.
- Northland Power Solar Burks Falls East L.P., by its managing general partner, Northland Power Solar Burks Falls East GP Inc.
- Northland Power Solar Belleville North L.P., by its managing general partner, Northland Power Solar Belleville North GP Inc.
- Northland Power Solar Belleville South L.P., by its managing general partner, Northland Power Solar Belleville South GP Inc.
- Northland Power Solar Glendale L.P., by its managing general partner, Northland Power Solar Glendale GP Inc.
- Northland Power Solar North Burgess L.P., by its managing general partner, Northland Power Solar North Burgess GP Inc.
- Northland Power Solar Burks Falls West L.P., by its managing general partner, Northland Power Solar Burks Falls West GP Inc.
- Northland Power Solar Abitibi L.P., by its managing general partner, Northland Power Solar Abitibi GP Inc.
- Northland Power Solar Empire L.P., by its managing general partner, Northland Power Solar Empire GP Inc.
- Northland Power solar Long Lake L.P., by its managing general partner, Northland Power Solar Long Lake GP Inc.
- Northland Power Solar Martin's Meadows L.P., by its managing general partner, Northland Power Solar Martin's Meadows GP Inc.
- 1000380886 Ontario Ltd.
- Jurassic Solar LP, by its general partner, Jurassic Solar GP Ltd.
- Northland Power Luna I Limited Partnership, by its general partner, Northland Power Luna I GP Inc.
- Northland Power Luna II Limited Partnership, by its general partner, Northland Power Luna II GP Inc.



Contact

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