

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 BESS, Ontario

## 1. 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, prepared to comply with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) for the financial year ended December 31, 2025 (the “Reporting Period”). The contents of this report and the policies described in it, apply to Northland Power Inc. and its subsidiaries identified in the Appendix as a whole (together, “Northland”).

## 2. Structure, activities and supply chains

### Structure

Northland Power is a Canada-based 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, owning and operating a diversified mix of energy infrastructure assets including offshore and onshore wind, solar, battery energy storage, and natural gas. Northland also supplies energy through a regulated utility.

Headquartered in Toronto, Canada, with global offices in seven countries, Northland owns or has an economic interest in 3.5 GW of gross operating generating capacity, 2.2 GW under construction and early to mid-stage development opportunities encompassing approximately 9 GW of potential capacity.

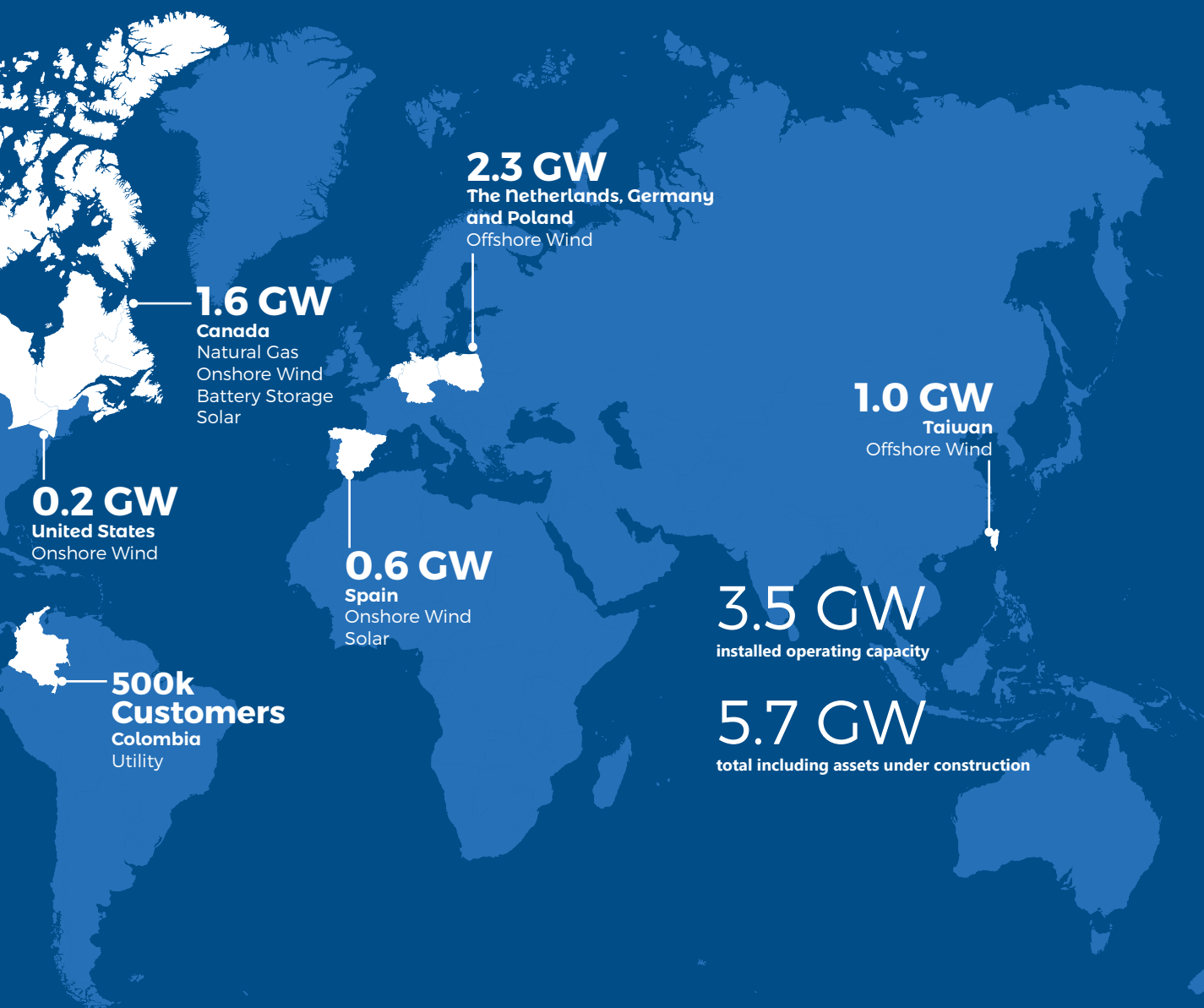
Publicly traded since 1997, Northland’s common shares, Series 1 and Series 2 preferred shares trade on the Toronto Stock Exchange under the symbols NPI, NPI.PR.A and NPI.PR.B respectively.

During the Reporting Period, we transitioned our operating structure from three technology-based business units to two regional hubs, International and the Americas, working with a global project delivery team. As of December 31, 2025, Northland employed approximately 1,160 individuals globally, across its global offices, project sites and operating facilities.



Jurassic BESS, Alberta

# Global footprint





## Governance

Northland's Board of Directors oversees governance and risk management processes. This oversight is exercised directly and through Board committees, in accordance with their respective mandates.

We have adopted corporate policies that address ethical conduct and human rights-related matters, including our Human Rights Policy, Code of Business Conduct and Ethics, and Anti-Bribery and Corruption Policy. The Board, through its committees, ensures compliance with these key policies and reviews their terms annually. Management administers and applies these policies across the organization, including through employee onboarding, policy maintenance and updates, and training on key corporate policies.

Northland maintains a centralized supply chain management function that leads our supply chain and procurement activities. This function oversees and interfaces with other corporate management functions on key supply chain activities, including strategic sourcing, contract management, and supply chain risk management.



## Supply Chains

During the Reporting Period, Northland's first battery energy storage project in Ontario, Canada achieved commercial operations, and we scaled our energy storage platform by acquiring two late-stage projects in Poland. Northland also achieved financial close for and commenced construction of a battery energy storage project in Alberta, Canada. We continued to advance construction of our offshore wind projects in Poland and Taiwan, and first power was achieved at our offshore wind project in Taiwan.

The following activities were ongoing or completed during the Reporting Period:

### Offshore Wind

- Installation of offshore substations and export cables
- Installation of monopile foundations and turbines
- Installation of jacket foundations
- Turbine commissioning
- Grid interconnection works

### Battery Storage

- Fabrication of key electrical equipment
- Installation of foundations for battery packs and transformers
- Finalizing civil works
- High voltage substation construction
- Cabling leading up to commissioning
- Final commissioning

Critical components required for construction of our offshore wind and battery energy storage projects are manufactured in the following countries:

- Wind turbine and associated components: Belgium, Brazil, Czech Republic, Denmark, Finland, France, Germany, Italy, Poland, Slovenia, South Korea, Spain, Taiwan, Turkey, United Kingdom, United States, and Vietnam
- Battery storage: China, United States

Each year, Northland engages a diverse network of suppliers and vendors worldwide. While our largest suppliers primarily support our construction activities, we also maintain long-term contracts for operations, maintenance, and corporate services across our value chain.

Our global supply chain spans Asia, Europe, and North America, and is largely focused on the procurement of capital goods and services for the development, construction, and operation of our energy infrastructure assets. Critical components for offshore wind, onshore renewable and battery storage projects – including turbines, blades, nacelles, towers, foundations, inverters, transformers, subsea cables, onshore and offshore substations, mooring systems, battery systems and power conversion systems – are sourced from a limited number of global suppliers.

As a project-based business, the composition of our supplier base and associated capital expenditures may vary year to year depending on project development and construction activity, which can limit the comparability of period-over-period data.

## 3. Policies and Due Diligence

Northland conducts reasonable due diligence of suppliers, vendors, and contractors prior to, and in parallel with, negotiating contractual agreements. We use contractual terms to set compliance requirements aligned with Northland's policies and standards. Reviews are conducted at various stages of the project life cycle, including during market analysis, supplier due diligence, and supplier monitoring. We engage with partners and suppliers to support information sharing related to compliance with applicable policies and codes of conduct.

### Key Policies and Documents

Our policies apply to internal operations, engagement with partners and communities, and activities within our value chain. These policies address, and are not limited to, prohibiting the use of forced labour and child labour. They also set expectations related to equal employment opportunities, freedom of association, dignity, privacy, and safe and fair working conditions, without discrimination or violence based on ethnic background, culture, religion, sexual identity or orientation, race, gender, ability, or other protected characteristics.

#### Human Rights Policy

Introduced in 2023, Northland's Human Rights Policy describes our governance and due diligence processes for identifying and addressing potential human rights risks within our operations and supply chain. The policy aligns with the United Nations (UN) Guiding Principles on Business and Human Rights and other applicable international laws and standards.

#### Global Code of Business Conduct and Ethics

Northland's Code of Business Conduct and Ethics (the "Code") applies to employees, officers, directors, consultants, and representatives of the company. The Code sets requirements and guidance related to conflicts of interest, workplace conduct, social responsibility, human rights, diversity, legal compliance, and ethical business practices. Employees acknowledge the Code during onboarding and are notified of material updates annually.

#### Anti-Bribery and Corruption Policy

Northland's Global Anti-Bribery and Corruption Policy sets requirements relating to preventing bribery and corruption and complements the Code. This policy outlines requirements related to gifts, donations and community investments, and interactions with public officials, as well as reporting obligations.

#### Supplier and Partner Code of Conduct

Northland's Supplier and Partner Code of Conduct applies to suppliers, vendors, and partners and sets expectations regarding compliance with applicable laws, and our values and standards for health, safety and security, environmental management, human rights and labour rights, and ethical conduct. This Code is incorporated into supplier and partner relationships and is used as a reference point in due diligence and contractual arrangements.

#### Whistleblower Policy

Northland's Whistleblower Policy provides a mechanism for employees, stakeholders, and third parties to report actual or suspected misconduct or violations of law or Northland's Code of Business Conduct. The policy includes protections against retaliation.

#### Diversity, Inclusion and Belonging

Northland has a Diversity, Inclusion and Belonging framework that describes six key pillars that guide internal practices related to workplace inclusion and diversity.

#### Our Commitment to Local Communities and Indigenous People

Northland engages with local and Indigenous communities in connection with development, construction, and operation of our projects. Engagement activities support project planning and ongoing operations and are intended to foster trusted partnerships with local and Indigenous communities.



Hai Long, Taiwan

## Due Diligence and Risk Management

When entering new markets, Northland considers human rights-related risks, including risks related to forced labour and child labour. Certain aspects of our operations and supply chain, including manufacturing activities and the sourcing of raw materials and components, may be exposed to risks related to forced labour or child labour.

Northland's policies and procedures govern how we conduct business with employees, suppliers and contractors. Where appropriate, we consider project-specific assessments of potential human rights and social impacts aligned with relevant international standards, including, but not limited to, the Equator Principles and International Finance Corporation Performance Standards.

Northland has the following tools and mechanisms at its disposal to assess potential exposure to risks associated with key suppliers and to identify and manage other ESG-related risks in our supply chain:

### *Digital Software*

Northland uses a digital platform to conduct Requests for Information (RFIs) and Requests for Proposals (RFPs). The platform supports pre-qualification screening of potential suppliers and collection of information related to ESG practices, including human rights.

### *Pre-qualification Questionnaires and Requests for Information*

Northland uses pre-qualification questionnaires and RFIs to collect information from potential suppliers on their ESG programs, policies, and procedures, including those related to human rights. Responses may inform the need for additional due diligence or the inclusion of specific contractual terms.

### *EcoVadis*

Since 2022, Northland has used EcoVadis sustainability ratings as part of supplier evaluation and onboarding for critical or high exposure spend categories. EcoVadis provides supplier-level information on environmental, social, and ethical risks. Due to the nature of Northland's project-based activities, engagement with some suppliers may be limited in duration, which can affect participation in EcoVadis assessments. Where EcoVadis participation is not available, we request alternative documentation related to sustainability practices and policies to support ESG screening.

### *Social Impact Assessments*

For development projects, Northland may engage third-party consultants to conduct Social Impact Assessments. These assessments examine baseline social conditions and potential project-related impacts, including labour conditions and risks related to forced labour and child labour. Findings may inform mitigation measures.

### *Human Rights Assessments*

Project-level Human Rights Assessments may be conducted where relevant. These assessments are used to identify human rights-related risks and inform preventative or mitigative measures, including those related to the supply chain.

### *Contractual Agreements or Terms and Conditions*

Northland seeks to negotiate standard contractual terms and conditions into agreements with suppliers and contractors. These terms address compliance with our Supplier and Partner Code of Conduct and may include provisions related to issues identified through due diligence, including potential risk of forced labour or child labour in a supplier or contractor.

During the Reporting Period, we continued to use these tools and mechanisms to assess, and where relevant, conduct due diligence for, potential and existing suppliers. Northland continually seeks to identify opportunities to improve how we understand and manage our supply chain risks.

## 4. Steps taken to prevent and reduce the risk of forced labour and child labour

During the Reporting Period, Northland conducted reasonable due diligence and applied existing policies and procedures to identify and manage risks within our supply chain. We coordinated these activities across internal departments and, when relevant, engaged with suppliers, vendors, and contractors to address identified risks.

Northland took the following steps during the Reporting Period to prevent or reduce the risk of forced labour and child labour in our supply chains:

- Continued to implement our Human Rights Standard Operating Procedure (the "SOP") and Human Rights Policy;
- Refinement of the scope of the SOP through internal discussions with key stakeholders;
- Obtained a third-party review of the SOP to identify challenges and recommend improvements;
- Assessed potential suppliers using EcoVadis and engaged select suppliers on ESG performance;
- Delivered mandatory corporate ethics, modern slavery and human rights training.

## 5. Remediation

Northland has procedures in place to address reported incidents within our supply chain, operations, and communities within our projects' area of influence. We maintain local grievance mechanisms throughout the project life cycle, from construction to operations.

Our Whistleblower Policy applies to employees, officers, directors, contractors, suppliers, and third-party community members. We investigate reports received under this policy and report allegations submitted in good faith to the Audit Committee of the Board. The policy includes protections against retaliation.

Northland did not identify any instances of forced labour or child labour in our operations or supply chains during the Reporting Period. Northland also did not identify any loss of income for vulnerable families resulting from actions taken to address forced labour or child labour risks. As a result, Northland did not implement remediation measures during the Reporting Period. Northland will continue to assess its activities and supply chains and take appropriate remediation steps if forced or child labour are identified.

## 6. Training

### *Human Rights and Modern Slavery*

In 2022, Northland introduced mandatory training on human rights and modern slavery, developed by an external provider. The training includes modules on modern slavery, human trafficking, global context, and relevant business practices. It also includes information on supplier due diligence and identifying human rights risks in supply chains. We continued to deliver this training to employees during the Reporting Period.

### *Anti-Bribery and Anti-Corruption Policy*

Northland updated the Anti-Bribery and Anti-Corruption Policy during the Reporting Period. The accompanying mandatory training is scheduled to be delivered to employees during 2026.

### *Code of Business Conduct Policy and Ethics and Whistleblower Policy*

Northland updated the Code of Business Conduct and Ethics and Whistleblower Policy during the Reporting Period. The accompanying mandatory training is scheduled to be delivered to employees during 2026.



Spy Hill Generating Station, Saskatchewan

## 7. Measuring effectiveness

Northland reviews corporate policies annually. The Governance and Nominating Committee of the Board reviews and recommends policy updates where required to align with best practices and address regulatory requirements. We track and report annual policy-related training completion metrics as an indicator of employee awareness of key policies.

At the project level, Northland subjects international projects under construction, including Hai Long and Baltic Power, to environmental and social compliance audits every two years. These audits identify areas for improvement or non-conformities requiring corrective action.

Beyond policy reviews and project-level audits, during the Reporting Period we reviewed our Human Rights Standard Operating Procedure and identified improvements to support a more standardized, streamlined, and effective supply chain due diligence process.

## 8. 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, reasonable due diligence 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, 2025, which can be found at [www.sedarplus.ca](http://www.sedarplus.ca) under Northland's profile and on Northland's website at [northlandpower.com](http://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.

## 9. 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 in the Appendix. 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.



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**Christine Healy**

President & CEO



Mont-Louis, Québec

# 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.
- Collisard Power Limited Partnership, by its general partner, Northland Power Collisard GP Inc.
- Parkinson Solar Inc.
- Sandy Lakes Power LP, by its general partner, Sandy Lakes Power GP Inc.



Contact

**Jaime Hurtado Cola**

Chief Legal Officer

[sustainability@northlandpower.com](mailto:sustainability@northlandpower.com)

**Northland Power Inc.**

30 St. Clair Avenue West, 3rd Floor

Toronto, Ontario, Canada

M4V 3A1

[northlandpower.com](http://northlandpower.com)