



Great Lakes Pilotage
Authority

Administration de pilotage
des Grands Lacs

2025 Annual Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

This report is submitted on behalf of Great Lakes Pilotage Authority, a federal Crown corporation and covers activities from January 1, 2024, to December 31, 2024.

Structure, activities and supply chains

The Great Lakes Pilotage Authority (GLPA) is a Federal Crown Corporation responsible for providing marine pilotage service within designated Canadian waters of the St. Lawrence River and the Great Lakes Region and jointly support Pilotage Services in the Binational waters with our US counterpart. The GLPA reports to the Minister of Transport and Internal Trade.

The GLPA purchases goods predominantly inside of Canada.

The Authority's mission is to deliver safe, secure, effective and financially self-sustaining marine pilotage services within its jurisdictions and geographical boundaries. The Authority currently provides these services in 41 ports¹ or areas that have been designated by Transport Canada for requiring compulsory pilotage services. Suppliers play a vital role in the Authority's operations, and we recognize that mutual reliance and respect form the basis of an excellent relationship. The vast majority of goods purchased are related to marine safety supplies and operational technical equipment for pilotage and administration. Most of these goods are sourced from local suppliers in Canada, with the exception of specialized equipment, which may be procured internationally. The Authority provides pilotage services and does not distribute products within Canada or outside of Canada.

Steps to prevent and reduce risks of forced labour and child labour

The GLPA's Code of Conduct and Ethics builds on a "common sense" approach to business. It is the ethical framework for how GLPA operates, and it applies to everyone who works for and with the GLPA. GLPA is in the process of developing a Supplier Code of Conduct which would provide greater detail on how GLPA's new and existing suppliers are expected to conduct their business with the GLPA, subject to any applicable laws.

The Supplier Code of Conduct will include measures aimed at mitigating and disclosing the risks of human trafficking, forced labor and child labor, and to monitor their supply chain's compliance with human and labor rights.

Once the code is formalized, the GLPA will communicate the requirement to its suppliers and employees and provide any training that is necessary.

¹ Ports for GLPA GLSLs, Martin Associates Economic Study-Great Lakes-StLawrence Region (marinedelivers.com/wp-content/uploads_July_19_2023.pdf) page 15.

The GLPA envisions including the supplier code of conduct to future vendor contracts and the GLPA will be reserve the right to take appropriate action, including, but not limited to, seeking further information, deeming a bid non-responsive, and terminating the contract for default, if the Supplier fails to comply with the code of conduct guidelines.

Policies and due diligence processes in relation to forced labour and child labour

GLPA's procurement policy and processes are in place as controls to ensure value for money when procuring goods and services. These business practices promote fairness and transparency in procurement decisions, effectively managing vendor relationships and mitigating risks associated with vendor-performed services or activities on our behalf.

The GLPA plans to include due diligence processes in relation to forced labour and child labour in future procurement policy amendments. This will be accomplished by amending our procurement policy to include a section for employees that outlines the Act's requirements when procuring goods and services on behalf of GLPA.

The GLPA will also periodically assess contract terms and conditions and the Supplier Code of Conduct for compliance. GLPA will require that all vendors agree with our Supplier Code of Conduct and that it be included in all contractual relationships with GLPA.

Identifying parts of your institution's activities and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage those risks

The GLPA has not started the process of identifying which parts of our activities and supply chains in the marine industry carry a risk of forced labour or child labour being used.

Measures taken to remediate any forced labour or child labour

GLPA is not aware of any instances of vendors using forced labour or child labour within our activities or supply chain during this or previous reporting periods.

Measures taken to remediate the loss of income to the most vulnerable families that result from any measure taken to eliminate the use of forced labour or child labour in the institution's activities and supply chains

The GLPA is not aware of 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/or supply chains. As such, no measures have been taken to remediate the loss of income for the most vulnerable families.

Training provided to employees on forced labour and child labour

The GLPA does not provide any training to employees on forced labour and/or child labour. Employees within the purchasing/finance department will be directed to take any applicable webinars produced by Public Safety Canada or other organizations as deemed necessary.

Assessing effectiveness in ensuring that forced labour and child labour are not being used in activities and supply chains

The GLPA will establish a regular review of the organization's policies and procedures related to forced labour and child labour. GLPA evaluates its progress in preventing and mitigating the risk of forced labour or child labour within our supply chain by assessing its practices against the practices of other Crown corporations and regulatory expectations, and through leveraging learning opportunities in this field.

Attestation

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 the Great Lakes Pilotage Authority, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity 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.



Jean Aubry-Morin

Chief Executive Officer

31 May 2025

I have the authority to bind the Great Lakes Pilotage Authority