



# CITY OF PETERBOROUGH HOLDINGS INC.

1867 Ashburnham Drive, PO Box 4125, Station Main  
Peterborough ON K9J 6Z5

## **City of Peterborough Holdings Inc.**

Annual Report on Forced Labour in Canadian Supply Chains  
For the year ended December 31, 2023

The following report is prepared in accordance with the requirements of Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (the “Act”).

As per subsection 11(3) of the Act, the following information is provided regarding the City of Peterborough Holdings Inc. (the “Company”) for its fiscal year from January 1, 2023, to December 31, 2023.

### **a. Structure, activities and supply chains**

The City of Peterborough Holdings Inc. is an investment holding company with a 100% ownership interest in Peterborough Utilities Inc. (“PUI”), Peterborough Utilities Services Inc. (“PUSI”) and PUG Services Corp. (“PUGSC”). The Company is incorporated and domiciled in Canada with its head office in Peterborough, Ontario. In total, the Company has approximately 125 employees, all of which are located in Ontario.

PUI is primarily involved in the development and generation of electricity through its hydroelectric and solar generating stations which are located in Peterborough, Ontario, and the surrounding area. The Company also carries out a hot water heater and lighting equipment rental business and provides metering services to customers in Ontario.

PUSI and PUGSC are professional services companies that deliver corporate services to affiliated companies and others within the Peterborough region.

The Company is 100% owned by the Corporation of the City of Peterborough.

A copy of the organizational structure is included as Appendix A.

The centralized supply chain team is made up of 2 professional staff members. The majority of purchases for the company are channelled through this team. Supply chain demands are for the most part driven by ongoing maintenance of operational equipment and sustaining capital needs. Large capital purchases are channelled through a multi-level review process due to the inherent risks (safety, production utilization, etc.) associated with a larger-scale construction project.



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Approximately 95% of goods and services utilized by the Company are acquired domestically in Canada. In certain situations where specific goods or services are not available or economically viable from Canadian sources, specialized equipment is manufactured and imported from the United States of America and Europe.

### **b. Policies and its due diligence processes in relation to forced labour and child labour**

The Company does not have specific policies and procedures in place in relation to forced labour and child labour.

All purchasing for the Company is performed via a centralized purchasing department that identifies and tracks any vendor related issues. The organization adheres to an overarching Purchasing Policy for all procurement activities. The scope of the policy extends to all levels of the organization.

All operational staffing is overseen by the Company's Human Resources department. Given the size of the organization, the Manager of Human Resources is familiar with all employees and the risk of forced or child labour is low.

### **c. The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk**

The Company has not identified any areas that would be at a high risk of forced labour or child labour being used. Given the technical nature of materials purchased for generation facilities and the professional requirements of service providers, the risk of forced or child labour is low.

As indicated above, the majority of supply chain activity is within Canada, with 3 main international suppliers located in USA, France, and Germany. Each of these international companies have policies in place outlining measures taken to remediate/eliminate all forms of forced or child labour.

The Company has a mature risk management process with identified risks and mitigation factors tracked on a risk register that is reviewed by Management on a semi-annual basis. Reporting on these key risks is then presented to Company Executives and Board members. As part of the Company's response to Bill S-211, forced labour and child labour will be added to the risk registry moving forward.



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### **d. Any measures taken to remediate any forced labour or child labour**

Given the low risk identified, no remediation measures have been taken. Should any such issue arise, it would be brought to the attention of the Company Executives.

### **e. Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains**

Given the low risk identified, no remediation measures have been taken. Should any such issue arise, it would be brought to the attention of the Company Executives.

### **f. The training provided to employees on forced labour and child labour**

The Company has not yet provided any training on this issue. Training program options will be reviewed for all supply chain and human resources staff.

### **g. How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains**

No actions have been taken to assess the effectiveness in preventing and reducing risks of forced labour and child labour in the supply chain.

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 Company. 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.

Nancy Brown Andison  
May 29, 2024

Board Chair, City of Peterborough Holdings Inc.  
I have the authority to bind the Company.



# CITY OF PETERBOROUGH HOLDINGS INC.

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## Appendix A

