



**Policy Title:** Reducing the Risk of Modern Slavery in Emera’s Business and Supply Chain Policy

**Policy Section:** Legal, Contract & Third-Party Management (LEG)

**Policy Number:** EMA-LEG-POL-02-1

**Policy Adopted by:** Emera Inc., and its Canadian subsidiaries (the “Emera Company”)

**Policy Owner:** Corporate Legal

**Effective Date:** January 1, 2024

**Supersedes:** N/A - New

## 1. Purpose and Objective:

The purpose of this policy is to reduce the risk of Child Labour and Forced Labour within the Emera Company’s supply chains or operations. The Emera Company does not tolerate the use of Child Labour or Forced Labour and is committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing systems and controls, which are designed to reduce the risk of Child Labour or Forced Labour from taking place in the Emera Company’s supply chains or operations.

## 2. Scope:

Compliance with this Policy is mandatory for all persons working for the Emera Company or on the Emera Company’s behalf in any capacity, including all employees, directors, officers, agents, contractors, consultants, and suppliers. This Policy operates in conjunction with Emera’s Third-Party Risk Management Policy.

## 3. Defined Terms:

**Modern Slavery:** includes either Child Labour or Forced Labour.

**Child Labour<sup>1</sup>:** means labour or service provided or offered to be provided by persons under the age of 18 years and that:

- a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;

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<sup>1</sup> As defined in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

- b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
- d) constitute the worst forms of child labour as defined in article 3 of the [Worst Forms of Child Labour Convention, 1999](#), adopted at Geneva on June 17, 1999.

**Forced Labour<sup>2</sup>:** means labour or service provided or offered to be provided by a person under circumstances that:

- a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or
- b) constitute forced or compulsory labour as defined in article 2 of the [Forced Labour Convention, 1930](#), adopted in Geneva on June 28, 1930.

#### 4. Policy:

The Emera Company's suppliers must not engage in practices that constitute Child Labour or Forced Labour or use goods or services in their supply chain that are used in the provision of goods or services to the Emera Company from suppliers that engage in practices that constitute Child Labour or Forced Labour.

The Emera Company shall take steps to reduce the risk of Child Labour or Forced Labour within its supply chains or operations. The Emera Company shall implement risk-based processes and controls to reduce the risk of Child Labour or Forced Labour in its supply chains or operations, including, where appropriate supplier risk assessment, diligence, contractual provisions, and training. The Emera Company can require its suppliers to certify that they do not use Child Labour or Forced Labour in their supply chains and operations.

Individuals working for or on behalf of the Emera Company shall not engage in, facilitate, or fail to report any activity that could reasonably lead to the use of Child Labour or Forced Labour in Emera Company's supply chains or operations.

#### 5. Responsibilities:

**All Employees, Officers, and Directors** are responsible for adherence to this Policy.

**Accountable Executives** are responsible for overall oversight and execution of this Policy.

**Enterprise Risk Management** serves as a resource for Child Labour or Forced Labour risk mitigation and for due diligence activities by performing supplier background screenings on behalf of the Emera Company.

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<sup>2</sup> As defined in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

**Procurement and Legal** are responsible to ensure that appropriate risk mitigation activities occur which are consistent with this Policy, and the nature, scale and potential Child Labour or Forced Labour risks of its respective operations and legal requirements, including the review of all applicable third-party contracts.

**Third Parties**, including agents, contractors, consultants, and suppliers, are responsible for adherence to this Policy.

## **6. Consequences:**

Individuals working for or on the Emera Company's behalf are required to report any activity that might lead to a breach of this Policy. Employees may report breaches to any leader, the Legal department, or through the Clearview Connects™ Ethics Hotline. A report can be made with Clearview Connects™ at:

Website: [www.clearviewconnects.com](http://www.clearviewconnects.com)

Within North America: 1-866-344-8801

Within Caribbean: 1-416-386-8094

Failure to report, in good faith, a suspected violation of this Policy may result in disciplinary action, up to and including termination, for individuals working for or on the Emera Company's behalf.

Reported violations of this Policy by individuals working for or on the Emera Company's behalf will be investigated and may result in disciplinary action up to and including termination of relationships.

Emera Company will not tolerate retaliation, threats of retaliation, termination from an Emera Company, or other types of discrimination that are directly or indirectly related to the good faith disclosure of suspected unethical activities or violations of laws, regulations or policies, including this Policy.

## **7. Inquiries:**

All questions and inquiries should be directed to the Emera Company's Legal department.