



Report on the Fighting Against Forced Labour and Child Labour in Supply Chains Act



Publication
2026-05-29

Version
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Preface

In accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”), this report outlines the actions implemented by the Québec Port Authority (the “Authority”) during the 2025-2026 fiscal year. These actions aim to prevent and mitigate risks related to the use of forced labour or child labour at all stages of the production of goods procured by the Authority.

Covered Period

This report covers the period from April 1, 2025, to March 31, 2026.

Measures taken during the period

In 2025, the Administration adopted and implemented its new Responsible Procurement Policy. It also continued its awareness-raising efforts among its employees which began in 2024, notably through the production and distribution of short video clips addressing issues related to forced labour and child labour in supply chains.

The Administration will continue to remain vigilant regarding the risks of forced labour and child labour, noting that to date it has not identified any signs of such activities in its supply chains.

Structure, Activities, and Supply Chains

The Authority is a Canadian port authority established under the *Canada Marine Act*, with a mission to promote and develop maritime trade, serve the economic interests of the Québec City region and Canada, and ensure its profitability while respecting the community and the environment.

The Authority performs its duties as a manager of infrastructure and land owned by the Government of Canada. Generally, it does not act as the operator of these assets, relying instead on the expertise of specialized companies for their development. It is an independent, non-profit corporation established under federal law and it counts just over 120 employees.

Regarding procurement, it consists primarily of professional services, including subcontracting to local contractors for various construction sites and projects.

The Administration’s direct and indirect suppliers are generally located in Canada and occasionally in the United States. Some goods acquired by the Administration are manufactured elsewhere in the world but imported and distributed by Canadian companies. At the time of this report, the Administration was unable to obtain sufficiently conclusive additional information regarding the sourcing of raw materials by manufacturers distributed through its suppliers.

The Administration collaborates with the *Espace de concertation sur les pratiques d’approvisionnement responsable* (ECPAR) to support its broader responsible procurement efforts.

Policies and Processes

In 2025, the Administration adopted and implemented its Responsible Procurement Policy, which was updated throughout 2024–2025. This Policy is part of the Administration’s objective to strengthen its commitments to ethics, governance, and sustainable development, while promoting the adoption

of efficient and responsible practices in environmental, social, regulatory, financial, and operational areas. It stems from the 2024–2028 Environmental, Social, Governance, and Sustainable Development (ESGSD) Action Plan adopted in 2024.

On top of corresponding to the new technological tools made available to employees working in procurement, this new Responsible Procurement Policy establishes measures to ensure compliance with all applicable laws by various suppliers and business partners, including the fight against forced labour and child labour. The Policy was formulated, via a subsidiary directive, to allow for the future creation of a list of barred suppliers who do not meet the Administration's requirements. Such suppliers could be barred from any commercial relationship with the Administration for specified periods, or even indefinitely, depending on the practices or allegations against them.

The Administration has added contractual requirements regarding compliance with the Act to applicable procurement contracts. A review of all general contract templates was also completed in 2025.

Risks related to forced labour and child Labour

As part of the publication process of its new Responsible Procurement Policy in 2025, the Administration identified its procurement activities (those requiring at least a purchase order) and the main suppliers involved. This exercise confirmed that these suppliers are primarily local companies offering services in the fields of consulting, technical support, maintenance, and construction.

Although the assessment was part of a broader inventory exercise, it revealed that there are currently no identifiable risks related to forced labour or child labour directly linked to the Administration's activities. The Administration's response was adjusted accordingly, but it remains vigilant in this regard.

Due Diligence and Remedial Measures

As the Administration has not to date identified any signs of forced labour or child labour in its supply chains, it has not taken any specific corrective measures over the last year.

Training

The Administration collaborated with the *Espace de concertation sur les pratiques d'approvisionnement responsable* (ECPAR) to offer two training modules designed to strengthen the skills of various APQ teams involved with responsible procurement. These training sessions covered several topics, including the fight against forced labour and child labour. The training primarily targeted members of the interdepartmental working group on responsible procurement, as well as certain employees specifically selected due to their roles related to procurement activities, particularly within the Information Technology and the Events departments.

The Administration has decided to continue its collaboration with ECPAR to adapt this training into short video clips so that it can be offered to all employees. It ensured that the content is tailored and relevant to employees working in procurement in any capacity. This initiative aims to reach a wider audience and ensure that these clips can be used regularly as a training tool for the Administration's new employees.

The Administration will be able to build on its training catalogue through its partnership with ECPAR, but its primary goal is to keep up to date and promote existing training programs for its new staff, starting during the 2026-2027 period.

Objectives for Fiscal Year 2026-2027

The accountability exercise for the 2025-2026 period confirmed that no risks of forced labour or child labour have been identified in the Administration's supply chains to date. The Administration therefore considers that its risk level in this area remains low.

With the goal of allocating resource efficiently, the Administration adopted an approach during the last fiscal year that is proportionate to the assessed risk level. Responsibility for this issue has thus been shared between the teams in charge of responsible procurement and of sustainability. Although the measures currently in place appear appropriate to the context and have achieved full operational effectiveness under the circumstances, this governance structure nevertheless limits the implementation of long-term monitoring and continuous evaluation mechanisms.

For the 2026-2027 fiscal year, the Administration will assess the opportunity of clarifying its governance structure, particularly by centralizing responsibility for these issues within a single team. Such an approach would ensure more effective monitoring of issues related to forced labour and child labour and would facilitate the development of key performance indicators and a more systemic approach to supply chain assessment.



ATTESTATION



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QUÉBEC PORT AUTHORITY

In accordance with the requirements of the Act, and in particular section 11, I certify that I have reviewed the information contained in the report for the above-mentioned entity. I confirm with due diligence 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 mentioned earlier.

Olga Farman
President and Chief Executive Officer
May 29, 2026

_____, I have the authority to bind the Quebec Port Authority.