

## Halifax International Airport Authority

### Report Under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

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## INTRODUCTION

This report has been prepared for the financial year ending December 31, 2023, pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). This report describes the steps Halifax International Airport Authority (“**HIAA**”) has taken to prohibit forced labor and child labor in HIAA's supply chain.

HIAA's board of directors (the “**HIAA Board**”) approved this report as attested below on May 8, 2024.

## STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

### HIAA's Structure

HIAA is a locally controlled, non-share capital corporation first incorporated on November 23, 1995 under the *Canada Corporations Act* and continued on April 7, 2014 under the *Canada Not-for-profit Corporations Act*. HIAA has Members rather than shareholders or other equity holders and its Members are also its Directors. HIAA is governed by a Board of Directors whose members are nominated by the Halifax Chamber of Commerce, the Halifax Regional Municipality, the Province of Nova Scotia, and the Government of Canada.

### HIAA's Business & Activities

HIAA took over the management of Halifax Stanfield International Airport (“**Halifax Stanfield**”) from Transport Canada on February 1, 2000.

Since then, HIAA has helped ensure Halifax Stanfield, which is a key community and economic asset, can continue to provide the world-class service for which it has become internationally known. HIAA's mission is to accelerate the growth of our communities by connecting people and goods to the world.

As a community-based, non-share capital corporation all profits are reinvested back into the airport and the region. HIAA's sole business is the operation and development of Halifax Stanfield and HIAA does not engage in business activities outside of Canada. As of December 31, 2023, HIAA employed 212 persons engaged in management, technical, administrative, and general labour activities.

### HIAA's Supply Chain

In 2023, HIAA purchased goods and services from 408 supplier companies within Canada. It purchased and imported goods from 49 companies outside of Canada. Approximately \$1.6 million or 4.3% of purchase orders for goods and services were issued to suppliers outside of Canada. Goods were imported from the United States, the United Kingdom, the European Union, and Australia, that originated in the United States, the United Kingdom, the European Union, Australia, and China. HIAA imported goods

related to baggage handling, passenger experience, and airport operations, maintenance, and safety, including but not limited to:

- Electric vehicle chargers
- Passenger boarding bridges
- Baggage handling systems
- Airport equipment parts
- Automotive parts
- Commercial equipment

HIAA assesses the risk of forced labour and child labour in its supply chain to be negligible based on the quantity and nature of the goods and services purchased for the operation of the airport and the low-risk origin of the goods and services.

## POLICIES & DUE DILIGENCE PROCEDURES

### Supplier Code of Conduct

While recognizing the cultural and regulatory differences around the world, HIAA expects all suppliers to protect the fundamental human rights and dignities of their workers.

HIAA has developed a Supplier Code of Conduct (the "**Supplier Code**") to set out the principles and expectations on how organizations, including their representatives and employees, and subcontractors (collectively, "**Suppliers**"), who supply goods, services and construction to HIAA should conduct business with and deal with HIAA.

HIAA is committed, and expects our Suppliers and their applicable subcontractors to be committed, to upholding and promoting international laws and human and labour rights, including anti-bribery and anti-corruption laws; the principles and rights outlined by the International Labour Organization (ILO), the principles of the United Nations Universal Declaration of Human Rights; the United Nations Guiding Principles on Business and Human Rights; and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

The current version of the Supplier Code requires Suppliers to comply with applicable laws in the jurisdictions where they operate. HIAA is in the process of reviewing the Supplier Code to contemplate the evaluation of forced labour and child labour practices/risk among potential Suppliers and include guidance related to the evaluation and prevention of forced labour and child labour risk in HIAA's supply chain.

The Supplier Code will be incorporated by reference to all Supplier contracts entered into by HIAA in 2024 and moving forward.

### Contracting and Procurement Policy

HIAA has consistently acknowledged the need for transparency in its supply chain, particularly where there is only one source of supply for certain goods, services, and construction. HIAA employs a variety of competitive procurement processes for obtaining goods, services and construction, depending on the

nature of the purchase. A sole source acquisition is permitted only in limited circumstances and under stringent review processes. Otherwise, HIAA must use a public competitive acquisition process for all goods, services, and construction subject to few exceptions. Evaluation of bidder submissions can be made using objective criteria, such as price, or subjective criteria, such as experience. The overall intention is to obtain the best value for HIAA, in compliance with our governance and regulatory obligations, sound purchasing and supply chain practice, and our commitment to sustainability and diversity.

The current version of HIAA's *Contracting and Procurement Policy* (the "**Procurement Policy**") does not explicitly contemplate the evaluation of forced labour and child labour practices/risk among potential suppliers. HIAA recently updated the Procurement Policy to outline the internally approved methods of contracting for the procurement of goods, services, and construction, which result in the best value to HIAA while ensuring staff follow sound supply management principles and good business practices in support of HIAA's commitment to sustainability and diversity. HIAA intends to further revise the Procurement Policy in 2024 to reflect the necessity of the prevention of forced labour and child labour in HIAA's supply chain.

### Code of Business Conduct

HIAA has a Code of Business Conduct (the "**Business Code**") that serves to act as a guide for all employees in their day-to-day work, including those employees who engage in Supplier relationship management and contract on behalf of HIAA. The foundation of the Business Code is the belief that conducting business ethically is critical to the success of HIAA. This means upholding not only the law but also the highest standards of integrity, professionalism, and honesty. The guiding principles of the Business Code include commitments to maintaining a safe and healthy workplace, compliance with all laws and regulatory standards, and transparency in reporting practices.

### FORCED LABOUR AND CHILD LABOUR RISK ASSESSMENT

While HIAA had not, as of December 31, 2023, formally started the process to determine if any parts of its goods, importing activities and supply chains carry a risk of forced labour or child labour being used, it has a clear understanding of the locations from which it purchases goods and the manufacturers from whom goods are purchased. HIAA will use this information as a starting point for its risk analysis. HIAA is currently working on developing practices and procedures to determine if there are significant risks of forced labour and child labour in its supply chain, such as:

- a) monitoring regulatory and legislative trends and guidance;
- b) referring to UN Guiding Principles on Business and Human Rights;
- c) referring to International Bill of Human Rights, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labour Organization's Declaration on Fundamentals Principles and Rights at Work;
- d) conducting internal reviews to assess processes of contracting with Suppliers to ensure compliance with HIAA policies and procedures; and
- e) identifying or using a third-party service provider to identify product categories/suppliers with a medium and high risk of modern slavery and audit medium and high-risk suppliers.

## REMEDIATION MEASURES

As of December 31, 2023, HIAA has not become aware of any forced labour or child labour in its activities and supply chains and as such, no remediation measures were necessary. HIAA has established a confidential reporting procedure for employees through which anyone may report a breach of the Business Code. HIAA intends to expand the scope of this confidential reporting procedure to include breaches of the Supplier Code. Reports are reviewed, investigated, and addressed by the President & CEO, the Vice President, People, the Director, Legal Services and supported by the People & Legal Department.

## REMEDIATION OF LOSS OF INCOME

As of December 31, 2023, HIAA has not become aware of any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains and as such, HIAA has not taken any remedial measures with respect to loss of income as a result of efforts to reduce forced and child labour. HIAA views determination of whether vulnerable families have experienced such a loss of income as integral to this process and procedures for making such determinations will be considered.

## TRAINING & AWARENESS

HIAA has engaged in awareness-raising activities regarding forced labour and child labour among its leadership team and will engage in efforts to more broadly communicate and increase awareness of the requirements described in the Supplier Code, particularly with employees who are engaged in supply chain management or with suppliers. HIAA has not yet implemented formal training courses on forced labour and child labour but plans to do so in the future, which will be mandatory for employees who are engaged in supply chain management or with suppliers.

## PROGRAM EFFICACY

As of December 31, 2023, HIAA has not identified any risks of forced labour or child labour in its supply chains. If such risks are identified HIAA will take actions to prevent and reduce such risks in its goods importation activities and supply chains.

In order to strengthen its ability to assess the effectiveness of its efforts, HIAA will annually review its supply chain practices and procedures and implement such changes as may be required over time to ensure the success of such practices and procedures in future years.

## ATTESTATION

This report was reviewed and approved pursuant to subparagraph 11(4)(a) of the Act by the HIAA Board.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in the report for the entity specified below. 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 specified above.

I make the above attestation in my capacity as Chair of the HIAA Board for and on behalf of the HIAA Board.

### HALIFAX INTERNATIONAL AIRPORT AUTHORITY

Per:



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Name: John S. Fitzpatrick, K.C.  
Title: Chair, Board of Directors  
Date: May 8, 2024

*I have the authority to bind Halifax International Airport Authority.*