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Report Pursuant to the Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains

BORALEX
Beyond
RENEWABLE ENERGY

About this report

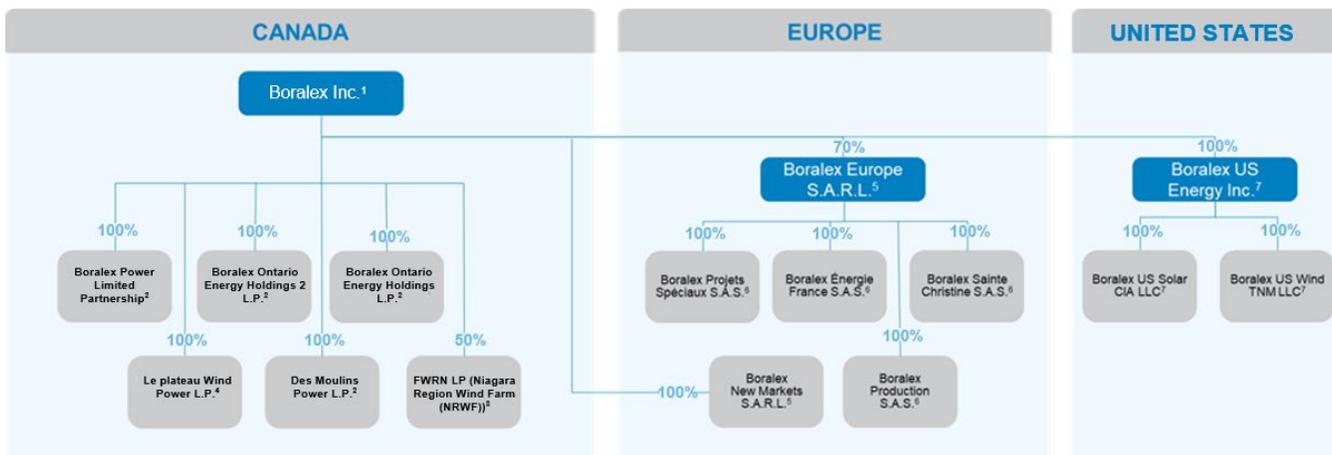
This is a joint report by Boralex Inc. and all of its Canadian subsidiaries (see [Appendix 1](#)) in order to comply with the *Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (the “Act”) for the period covering January 1 to December 31, 2023. Note that the policies and descriptions contained herein are applicable to Boralex Inc. and its subsidiaries as a whole (hereinafter “Boralex”).

Structure, Activities and Supply Chains

STRUCTURE AND ACTIVITIES

Boralex, a body corporate under the *Canada Business Corporations Act*, is a power producer whose core business is the development and operation of renewable energy power stations in Canada, France, the United States and the United Kingdom. It operates 100 wind farms, 12 solar energy facilities, 15 hydroelectric power stations and two storage facilities, representing an asset base with a net installed capacity of 3,078 MW, or 1,819 MW in North America and 1,259 MW in Europe. Boralex is also developing a portfolio of close to 6 GW in wind, solar and energy storage projects, all of which are guided by its corporate values and corporate social responsibility (CSR) priorities. Some of Boralex’s projects are joint ventures with private and community partners.

The following diagram shows the direct and indirect principal subsidiaries of the company. A significant portion of Boralex’s business is conducted through its subsidiary entities holding project assets.



Our Purpose



On our planet where electricity is central to fighting climate change, we have a responsibility to produce it sustainably for future generations.

MISSION and VISION

At Boralex, we provide **renewable** and affordable energy for all, **creating value** to share with our **partners**.

To achieve our mission, we rely on the best of our **strengths**.

Thanks to our **fearlessness**, our **discipline**, our **expertise**, and our **diversity**, we continue to be an industry leader.

And we do it with **pleasure**.

OUR VALUES

CREATIVITY
Go further with resourcefulness and ingenuity.

TEAM SPIRIT
Build on each other's differences to succeed together.

RESPECT
Act ethically and with a sense of duty.

ENTREPRENEURSHIP
Decide with agility and courage.

COMMUNICATION
Cultivate the exchange of ideas to create an open and lasting dialogue.

Beyond
RENEWABLE ENERGY

¹ Jurisdiction of incorporation: Canada.

² Jurisdiction of incorporation: Quebec.

³ Jurisdiction of incorporation: Manitoba. FWRN LP is the entity operating the NRWF project and which owns the intangible assets of the project, including the feed-in tariff contract.

⁴ Jurisdiction of incorporation: Manitoba.

⁵ Jurisdiction of incorporation: Luxembourg.

⁶ Jurisdiction of incorporation: France.

⁷ Jurisdiction of incorporation: Delaware.

STRATEGIC DIRECTIONS

GROWTH Grow our **project pipeline** and **create value** that **we share** with all our partners and communities.

DIVERSIFICATION Accelerate the development of our **skills** to produce electricity as markets and technologies **evolve**.

CUSTOMERS Develop **business practices** that are aligned with the needs of customers interested in improving their **climate footprint**.

OPTIMIZATION **Refine** our **practices** to maximize the performance and profitability of our assets and services.

CORPORATE SOCIAL RESPONSIBILITIES

E ENVIRONMENT

Responsible use of resources

Biodiversity

Adaptation to climate change

Greenhouse gas emissions (Scope 1 and 2)

S SOCIETY

Inclusion, diversity, and equal opportunity

Health and safety

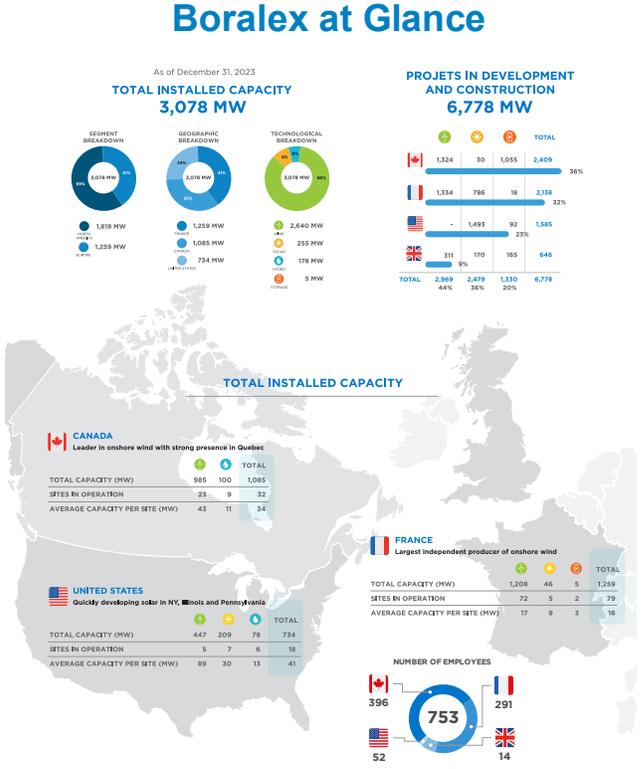
Community consultation and involvement

G GOVERNANCE

Responsible corporate governance

Ethics in business and behaviour

Sustainable procurement



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

POLICIES AND PROCESSES IMPLEMENTED

At Boralex, we apply due diligence practices aligned with the risks involved in our activities, our supply chains and our business relationships in a manner conducive to responsible conduct.

Our policies and commitments specifically address human rights, health and safety, diversity and inclusion, the environment and corruption. We embrace a zero-tolerance stance to human rights violations. We adhere to the [Equator Principles](#) and the [Universal Declaration of Human Rights](#), and we are committed to working with stakeholders who make it a priority to do the same.

Human rights considerations are systematically taken into account in the strategic decisions made at the senior management level. These include decisions related to updates to our internal policies, new project development and employees' work conditions.

From a governance standpoint, a multidisciplinary responsible procurement working group has been set up to closely monitor the initiatives put into place and the outcomes they generate, to assess repercussions on supply chains and to determine the course of action to be taken as needed. The Board of Directors also bears responsibility for responsible procurement as part of its mandate.

During the year, we formalized the management of strategic suppliers by incorporating this task into the mandate of the Senior Vice President, Corporate Strategy and Business Performance, and by creating a strategic procurement team.

Moreover, the fact that we make it a point to maintain close relationships with strategic suppliers who share our values with regard to human rights, ethics, health and safety, and the environment allows us to streamline our projects and meet deadlines.

We have an array of tools and processes in place to support our commitment to responsible procurement and fulfil our human rights obligations, including those applicable to each of the following groups.

Our suppliers



Development and implementation of our [Responsible Procurement Charter](#) outlining our expectations of our suppliers. Where relevant, Boralex evaluates the possibility of drafting contract provisions that contain remediation mechanisms in the event forced labour or child labour is suspected or identified.



The [EcoVadis assessment](#) for key strategic suppliers (or an appropriate ESG analysis) to incorporate ESG performance in a tangible way.



The [Solar Industry Forced Labor Prevention Pledge](#): Boralex is a signatory to this formal commitment to opposing forced labour within the solar industry.



[Engagement and awareness](#) efforts within the sector to improve business practices.

Our employees

- Our recently updated [Code of Ethics](#), along with mandatory annual ethics training for all employees, and the strategic management of our purchases.

Our communities

- Where relevant, assessments of potential adverse human rights impacts and climate change risks, in accordance with the [Equator Principles](#). In 2023, nine assessments of this nature were initiated or completed.

THE TOOLS WE USE



Responsible Procurement Charter

Our expectations of our suppliers are set out in our Responsible Procurement Charter, the latest version of which was published in December 2021. Based on ISO 26000 standards, the charter plays an integral part in our calls for tenders for purchases exceeding 150,000 CAD/USD/EUR in value. Suppliers are required to sign a binding agreement to abide by the charter. If they cannot, reasonable due diligence adapted to the circumstances will be performed and an ESG analysis may be conducted.

Under this charter, our suppliers are asked to commit to five core principles:

- Respect for fundamental rights — including child labour, modern-day slavery and forced labour — in accordance with the laws and regulations applicable and in force in the countries where they operate, as well as International Labour Organization (ILO) conventions, the Universal Declaration of Human Rights and Organisation for Economic Co-operation and Development (OECD) guidelines.
- Respect for and protection of the environment and biodiversity, which includes being mindful of the environmental impacts of their operations and their carbon footprint.
- Ethical behaviour and corporate integrity, which they are expected to maintain by conducting themselves in accordance with our Code of Ethics.
- Health and safety protection, which applies to their staff, their subcontractors and the public in the jurisdictions where they operate.
- Promotion of local development, specifically by hiring local businesses.

Suppliers must notify Boralex of any breach of these commitments and take corrective action as soon as possible. As regards the first principle pertaining to child labour and forced labour, we expect our suppliers to ensure compliance throughout their operations. We also reserve the right to request information and supporting documentation demonstrating that the required verifications are completed with their subcontractors on a regular basis.



EcoVadis assessment

We encourage our suppliers to complete the [EcoVadis](#) assessment, which provides a clear overview of their sustainable business practices, benchmarked against their sector and region. In 2023, 81% of our purchase volume involved EcoVadis-rated suppliers (for purchases exceeding 150,000 CAD/USD/EUR in value).

RISK OF FORCED LABOUR OR CHILD LABOUR IN OUR SUPPLY CHAINS AND STEPS TAKEN TO ASSESS AND MANAGE THE RISK

In order to assess the risk of forced labour and child labour in our supply chains, we mapped the risks of our active product suppliers in all of the jurisdictions where we source products as part of our operations.

The mapping process is based on an external risk analysis carried out through an assessment validated by EcoVadis where relevant (as specified on the previous page) and a key supplier risk assessment using available external indicators, which help identify exposure to greater risks of modern-day slavery, including:

- Industry-related risks
- Product-related risks
- Country-related risks
- Complexity of the supplier's supply chain
- Supplier's governance framework, policies and controls with regard to modern-day slavery, along with due diligence and code of conduct.

Our risk assessment focused on key suppliers to ensure the scope and scale were proportionate to the potential exposure to the corresponding risks.

The reasonable due diligence process in 2023 did not reveal any known cases of modern-day slavery among our suppliers.

MEASURES TAKEN TO REMEDIATE FORCED LABOUR OR CHILD LABOUR

Based on the mapping of our active suppliers, the identification of our key suppliers and the in-depth analysis to determine whether any of these suppliers present a higher risk of exposure to modern-day slavery, no known incidents or significant risks of modern-day slavery were identified. The issue of remediation is therefore not considered to be applicable.

We will nevertheless remain vigilant in this regard and will continue to rely on a procurement process that is built around the commitments outlined in the Responsible Procurement Charter or an ESG analysis, the governance of which was further enhanced in 2023.

MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME TO THE MOST VULNERABLE FAMILIES THAT RESULTS FROM MEASURES TAKEN TO ELIMINATE THE USE OF FORCED LABOUR OR CHILD LABOUR

As indicated in the previous section, we concluded, based on our assessment, that there was no loss of income for vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour within our supply chains.

TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

At Boralex, we take a zero-tolerance stance on modern-day slavery, human trafficking and undeclared, involuntary, forced labour and child labour. This is part of our Code of Ethics and is supported by annual mandatory training for all employees and board members. Our Code of Ethics reflects our corporate values and the behaviours we expect of our staff and directors in everything they do in the fulfilment of their duties, especially as it pertains to fundamental rights.

Moreover, the members of our procurement team have the option of enrolling in various modules of 10-hour training program provided by EcoVadis, a third-party assessor of the environmental, social and governance performance of organizations and their supply chains. Part of this program covers human rights issues such as forced labour and child labour.

We also regularly review our policies and training content to ensure they continue to be up-to-date, relevant and effective.

ASSESSMENT OF EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR ARE NOT BEING USED

We have put initiatives in place to determine the effectiveness of the efforts deployed at Boralex to ensure forced labour and child labour are not being used and will continue to improve and refine key performance indicators in this regard.

As stated earlier, we encourage key suppliers to undergo EcoVadis assessment, which we do ourselves to examine the measures and practices within our organization. This includes 360-degree monitoring, which incorporates external factors. This approach facilitates accountability in managing our partners, since any new risks or changes that emerge for our suppliers are flagged by EcoVadis. Internal reviews are conducted quarterly.

In 2023, 98% of the purchases made that exceeded 150,000 CAD/USD/EUR in value were done through suppliers that have signed our Responsible Procurement Charter or undergone ESG analysis. Under our charter, suppliers must notify Boralex of any breach of the commitments it contains (including those related to fundamental rights) and take any necessary corrective action as soon as possible. We reserve the right to take any measures we feel are required and audit our suppliers as appropriate. Internal reviews are conducted quarterly.

One of the key performance indicators used by Boralex is the percentage of employees and board members who have completed the ethics training program, which features a section on human rights and our zero-tolerance stance on modern-day slavery, forced labour and child labour. By the end of 2023, 99% of our staff members and directors had completed the program. All new hires and newly appointed board members are also required to complete the program as part of their onboarding process and subsequently enrol in annual refreshers applicable across the entire organization.

In the event that, despite our best efforts, employees who work closely with our suppliers are party to conversations or incidents that raise doubts about the use of forced labour or child labour, there is an independently managed 24/7 ethics hotline and website where they can anonymously report their concerns.

Approval and attestation

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 entity or entities 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 above.



Alain Rhéaume

Chairman of the Board, Boralex Inc.,
and Corporate Director

I have the authority to bind Boralex Inc. and its applicable subsidiaries



Patrick Decostre

President and Chief Executive Officer

I have the authority to bind Boralex Inc. and its applicable subsidiaries

APPENDIX 1

Borex's Canadian subsidiaries

| | | |
|-----------------------------|---|---|
| 1021702 B.C. LTD. | ALBERTA RENEWABLE POWER LIMITED PARTNERSHIP | BORALEX POWER LIMITED PARTNERSHIP/ SOCIÉTÉ EN COMMANDITE BORALEX ÉNERGIE |
| 13698742 CANADA INC. | | |
| 13698777 CANADA INC. | ALBERTA SHARPHILLS RENEWABLE POWER LIMITED PARTNERSHIP | BORALEX PROJECT SUB III INC./PROJET BORALEX SUB III INC. |
| 13698807 CANADA INC. | | |
| 14710690 CANADA INC. | BABCOCK RIDGE WIND LIMITED PARTNERSHIP | BORALEX QUÉBEC HOLDING L.P./BORALEX QUÉBEC SOCIÉTÉ DE PORTEFEUILLE S.E.C. |
| 14710703 CANADA INC. | | |
| 15519683 CANADA INC. | BABCOCK RIDGE WIND POWER CORPORATION | |
| 15519730 CANADA INC. | BISNETT WIND FARM LIMITED PARTNERSHIP | BORALEX SOLAR CIA II ULC |
| 15519772 CANADA INC. | | BORALEX SOLAR CIA ULC |
| 2474740 ONTARIO INC. | BORALEX DÉVELOPPEMENT CANADA INC. / BORALEX DEVELOPMENT CANADA INC. | BORALEX VAUGHAN INC. |
| 3266964 NOVA SCOTIA LIMITED | | BORALEX WESTERN ENERGY INC. |
| 5997889 MANITOBA LTD. | BORALEX INC. | BORALEX WIND ENERGY 2 INC. / BORALEX ÉNERGIE ÉOLIENNE 2 INC. |
| 7638957 CANADA INC. | BORALEX INTERNATIONAL INC. | |
| 7638965 CANADA INC. | | |
| 7640609 CANADA INC. | BORALEX LEASING SUB I INC./LOCATION BORALEX SUB I INC. | BORALEX WIND ENERGY INC. / BORALEX ÉNERGIE ÉOLIENNE INC. |
| 8437084 CANADA INC. | | |
| 8471398 CANADA INC. | BORALEX LEASING SUB II INC./LOCATION BORALEX SUB II INC. | BORALEX YELLOW FALLS HOLDINGS INC. |
| 8471410 CANADA INC. | | |
| 9143939 CANADA INC. | BORALEX OCEAN FALLS LIMITED PARTNERSHIP | BRANT BATTERY ENERGY STORAGE PROJECT INC. |
| 9145745 CANADA INC. | | CARLEX CORPORATION INC. |
| 9217-3483 QUÉBEC INC. | BORALEX ONTARIO ENERGY HOLDINGS 2 LP / PLACEMENTS ÉNERGÉTIQUES BORALEX ONTARIO 2 S.E.C. | DES MOULINS WIND POWER GP INC./ÉNERGIE ÉOLIENNE DES MOULINS COMMANDITÉ INC. |
| 9337-9675 QUÉBEC INC. | | |
| 9778691 CANADA INC | BORALEX ONTARIO ENERGY HOLDINGS LP / PLACEMENTS ÉNERGÉTIQUES BORALEX ONTARIO S.E.C. | DES MOULINS WIND POWER L.P./ÉNERGIE ÉOLIENNE DES MOULINS S.E.C. |
| 9778705 CANADA INC. | | |
| 9778713 CANADA INC. | | |
| 9778721 CANADA INC. | | DES NEIGES HOLDING CHARLEVOIX, S.E.N.C. |
| 9798293 CANADA INC. | BORALEX OPERATIONS INC. / BORALEX OPÉRATIONS INC. | DES NEIGES HOLDING OUEST, S.E.N.C. |
| AIR CASCADES INC. | | |

DES NEIGES HOLDING SUD,
S.E.N.C.

ÉOLIENNES CÔTE-DE-
BEAUPRÉ INC.

ÉOLIENNES CÔTE-DE-
BEAUPRÉ S.E.C.

ÉOLIENNES TÉMISCOUATA
II INC.

ÉOLIENNES TÉMISCOUATA
II L.P./ÉOLIENNES
TÉMISCOUATA II S.E.C.

ÉOLIENNES TÉMISCOUATA
INC.

ÉOLIENNES TÉMISCOUATA
S.E.C.

FRAMPTON WIND ENERGY
GP INC./ÉOLIENNES
FRAMPTON GP INC.

FRAMPTON WIND ENERGY
L.P./ÉOLIENNES FRAMPTON
S.E.C.

FRONT LINE WIND FARM
LIMITED PARTNERSHIP

FWRN LP

GRACEY WIND FARM
LIMITED PARTNERSHIP

HAGERSVILLE BATTERY
STORAGE INC.

INTEGRATED SOLAR
ENERGY INC.

JAMIE CREEK LP

LE PLATEAU 2 LIMITED / LE
PLATEAU 2 LIMITÉE

LE PLATEAU COMMUNITY
WIND POWER L.P./ ÉNERGIE
ÉOLIENNE
COMMUNAUTAIRE LE
PLATEAU S.E.C.

LE PLATEAU WIND POWER
GP INC./ ÉNERGIE
ÉOLIENNE LE PLATEAU
COMMANDITÉ INC.

LE PLATEAU WIND POWER
L.P./ ÉNERGIE ÉOLIENNE LE
PLATEAU S.E.C.

LENNOX BATTERY ENERGY
STORAGE PROJECT INC.

MARSH LINE WIND FARM
LIMITED PARTNERSHIP

MOOSE LAKE WIND LIMITED
PARTNERSHIP

MOOSE LAKE WIND POWER
CORPORATION

NAYLOR WIND FARM
LIMITED PARTNERSHIP

NORTH MALDEN WIND
FARM LIMITED
PARTNERSHIP

NR CAPITAL GENERAL
PARTNERSHIP

OLD ELM WIND FARM LTD.

OTTER CREEK WIND FARM
GP INC.

OTTER CREEK WIND FARM
LIMITED PARTNERSHIP

OXFORD BATTERY ENERGY
STORAGE PROJECT INC.

PARC ÉOLIEN APUJAT INC.

PARC ÉOLIEN APUJAT S.E.C.

PARC ÉOLIEN CÔTE-NORD
HOLDING S.E.C.

PORT RYERSE WIND FARM
LIMITED PARTNERSHIP

POTHOLE CREEK WIND
FARM LTD.

RED WILLOW WIND LIMITED
PARTNERSHIP

RED WILLOW WIND POWER
CORPORATION

RICHARDSON WIND FARM
LIMITED PARTNERSHIP

RONCEVAUX GP
LIMITED/RONCEVAUX
COMMANDITÉ LIMITÉE

RONCEVAUX WIND POWER
L.P./ÉNERGIE ÉOLIENNE
RONCEVAUX S.E.C.

S.E.C. FORCES MOTRICES
ST-FRANÇOIS

SEIGNEURIE DE BEAUPRÉ
WIND FARM 4 GP/

PARC ÉOLIEN DE LA
SEIGNEURIE DE BEAUPRÉ
4, S.E.N.C.

SEIGNEURIE DE BEAUPRÉ
WIND FARMS 2 AND 3
GENERAL PARTNERSHIP /
PARCS ÉOLIENS DE LA
SEIGNEURIE DE BEAUPRÉ 2
ET 3, SOCIÉTÉ EN NOM
COLLECTIF

SOCIÉTÉ DE PROJET BVH1,
S.E.N.C.

SOCIÉTÉ DE PROJET BVH2,
S.E.N.C.

SOCIÉTÉ DE PROJET BVH3,
S.E.N.C.

SOUTH SIDE WIND FARM
LIMITED PARTNERSHIP

SWANTON LINE WIND FARM
LIMITED PARTNERSHIP

TILBURY BATTERY
STORAGE INC.

WINDY POINT WIND PARK
LIMITED

YELLOW FALLS POWER
LIMITED PARTNERSHIP