

2026

# Fighting against forced labour and child labour in supply chains report



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This report is provided in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“the Act”) for the year ending December 31, 2025.

## Our business

Trans Mountain Corporation is a federal Crown corporation and a wholly owned subsidiary of Canada TMP Finance Ltd., which in turn is a wholly owned subsidiary of the Canada Development Investment Corporation (CDEV). We conduct our operations through four entities (read more in the sidebar). This report covers Trans Mountain Corporation and these four entities.

We are **committed** to addressing and combating risks of forced labour and child labour in our operations and supply chain

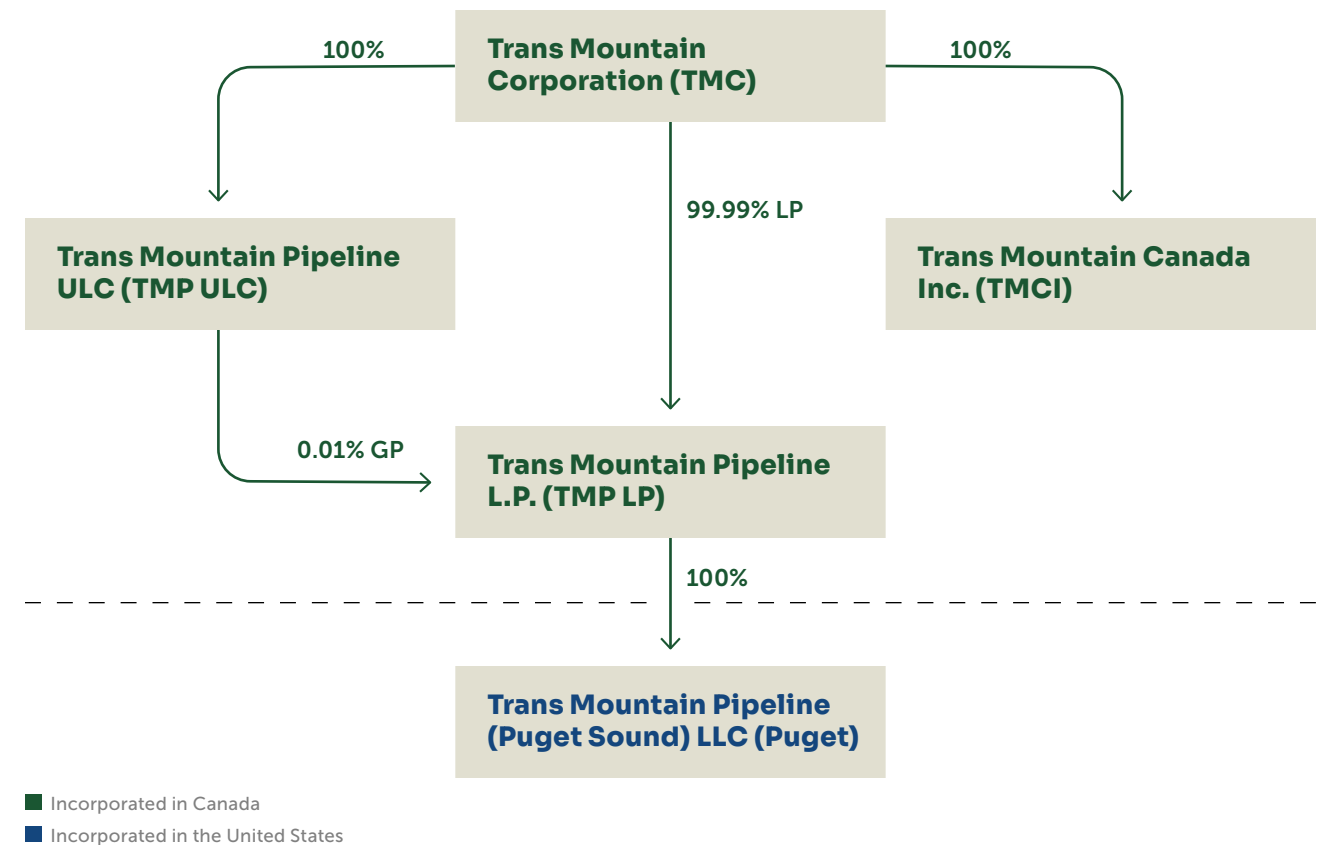
We operate Canada’s only pipeline system transporting oil and refined products to the West Coast. We have the capacity to deliver approximately 890,000 barrels of product each day through a pipeline system that runs through Alberta and British Columbia in Canada, to Washington state in the United States. We also operate a loading facility, Westridge Marine Terminal, in Burnaby, British Columbia.

Our headquarters are located in Calgary, Alberta, with regional offices along the pipeline corridor in Alberta, British Columbia and Washington state. On December 31, 2025, Trans Mountain employed more than 1,200 employees and contractors across our business.

## Our commitment

Trans Mountain is committed to addressing and combating risks of forced labour and child labour in our own operations and across our supply chain, and upholding internationally recognized human rights as reflected in the United Nations Universal Declaration of Human Rights.

## TRANS MOUNTAIN'S CORPORATE STRUCTURE



Trans Mountain is a federal Crown corporation that conducts its operations through four wholly owned subsidiaries: Trans Mountain Pipeline (Puget Sound) LLC, Trans Mountain Pipeline ULC, Trans Mountain Pipeline L.P. and Trans Mountain Canada Inc. Together, these entities own and operate the Trans Mountain Pipeline System, consisting of the expanded Trans Mountain pipeline system and the Puget Sound pipeline. This report covers Trans Mountain Corporation and the above entities. In this report, “Trans Mountain” refers to Trans Mountain Corporation and its direct and indirect subsidiaries.

## Policies

The following codes and policies formalize our approach to and requirements for upholding human rights across our operations and supply chain:

### Code of Business Conduct and Ethics

We conduct our business in accordance with our Code of Business Conduct and Ethics (“the Code”), which outlines our approach to upholding high standards of ethical conduct and includes provisions relating to upholding human rights. We require all Trans Mountain employees, contractors, suppliers and business partners to uphold the standards in the Code.

### Supplier Code of Conduct

Our Supplier Code of Conduct mandates that our suppliers maintain high standards of ethics and integrity while working with Trans Mountain, both in their own business and within their supply chain. The Supplier Code of Conduct also includes specific requirements for suppliers to uphold human rights and provide fair and legal pay. In 2025, we updated this Code to specifically mention that suppliers must be compliant with the Act to perform work for Trans Mountain.

### Whistleblower Policy

Our Whistleblower Policy outlines the process for reporting wrongdoings across the company. Reports of behaviour not in alignment with our codes and policies can be reported to our third-party Ethics Hotline. We promptly initiate an investigation into any reported allegation or suspicion of a violation of our codes, policies or a law or regulation, including instances of suspected forced labour or child labour. If the investigation finds a violation, we take appropriate action, which is overseen by Trans Mountain management and/or the Ethics Committee.

## Governance and oversight

We have established an oversight team to manage activities relating to forced labour and child labour. This team is composed of: our SVP Finance and Treasury; our Director, Supply Chain; our Director, Corporate Reporting; and our Supply Chain Contract Specialist. Our Board of Directors holds the highest level of accountability for upholding human rights across our organization, which includes our commitment to prohibiting forced labour and child labour. The Board reviews our Fighting against forced labour and child labour in supply chains report annually.

## Due diligence

We procure goods and services from more than 400 direct suppliers across a range of industries. We have taken steps to understand the risk of forced labour or child labour from these suppliers. As a result, we believe the overall risk of forced labour or child labour in our direct supply chain is low. Below are the steps taken in 2025 to improve our due diligence:

### Conducting a supplier risk assessment

We updated the desktop assessment of our direct suppliers to assess risks of forced labour or child labour. This assessment considered the origin country of these suppliers to identify if they come from countries of high vulnerability and prevalence of modern slavery as determined by [Walk Free](#), an international human rights group focused on the eradication of modern slavery. The majority (more than 95 per cent) of our supplier spend in 2025 came from Canada, which has a low risk for vulnerability and prevalence of forced labour or child labour, and the remaining came from other low-risk countries.

### Updating contract templates

In 2025, we modified our new supplier contract templates to contain a provision where suppliers must confirm they are compliant with the Act and allow us to conduct audits to confirm this compliance.



### Establishing a governance framework

In 2025, we implemented a governance framework and action plan. The governance framework defines the oversight team’s mandate, roles and responsibilities, meeting frequency and outlines a clear path for escalating potential issues and how progress is tracked on our due diligence activities. The action plan outlines the key activities we will conduct in 2026 to strengthen our due diligence.

### Remediation

We understand efforts to prevent and reduce the risks of forced labour and child labour can have the unintended consequence of contributing to a loss of income for vulnerable families. At present, Trans Mountain is not aware of any need to remediate the loss of income to families.

### Training

Our mandatory annual training for all employees on our Code of Business Conduct and Ethics includes content on forced labour and child labour. Additionally, in 2025, we provided training to our supply chain team members and other personnel involved in the procurement of goods and services regarding the Act and the updated Supplier Code of Conduct and associated procedures.

### Assessing effectiveness

Our oversight team meets monthly to track progress on activities, evaluate their effectiveness, plan future actions and review any performance indicators, such as reports of suspected forced labour or child labour.