



NUCLEAR WASTE MANAGEMENT ORGANIZATION SOCIÉTÉ DE GESTION DES DÉCHETS NUCLÉAIRES

Fighting against forced labour and child labour in supply chains report



2025

Founded in 2002, the Nuclear Waste Management Organization (NWMO) is a not-for-profit corporation mandated with the safe, long-term management of Canada's intermediate- and high-level radioactive waste.

Guided by a vision of leading the way in nuclear waste solutions that create a safe and clean future, the organization is committed to conducting business in a socially and environmentally responsible manner that respects applicable laws, Indigenous culture and human rights.

The NWMO submits this inaugural report in compliance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), which came into force on May 11, 2023. The Act imposes mandatory annual reporting obligations on entities meeting defined organizational thresholds, which the NWMO satisfied during 2025.

As a not-for-profit corporation operating exclusively in the highly regulated sector of nuclear waste management, the NWMO's overall exposure to forced labour and child labour risk is assessed as low. The organization does not manufacture or extensively procure large amounts of goods, does not operate in high-risk labour jurisdictions, and maintains a Canadian-based professional workforce governed by voluntary recruitment controls and a formal ethics reporting framework.

The NWMO's primary in-scope activity and perceived highest risk under the Act is the importation of promotional materials produced outside Canada (tier two suppliers), representing approximately \$175,000 in spend for 2025. Mitigations include supplier compliance obligations embedded in standard commercial terms and conditions, Code of Conduct expectations extending to all suppliers, and an anonymized grievance reporting channel accessible to employees and business partners alike.

While the NWMO's structural risk profile is low, the organization acknowledges the absence of a standalone forced labour policy and is committed to advancing these elements as we mature procurement policies and practices in this space.

This inaugural report was attested by Board Chair Glenn Jager on May 7, 2026, covering the financial year Jan. 1, 2025, to Dec. 31, 2025.

Part 1 – Submission information

1. This report is for:
 - An entity.
2. State the legal name of the reporting entity or government institution:
 - Nuclear Waste Management Organization (NWMO) is a not-for-profit corporation without share capital.
3. Reporting year:
 - May 31, 2026.
4. Financial year covered by report:
 - This report covers activities from Jan. 1, 2025, to Dec. 31, 2025.
5. Is this a revised version of a report that was already submitted this reporting year?
 - No.
 - 5.1 If yes, on what date was the original report submitted?
 - Not applicable.
 - 5.1.1 Which part(s) of the original submission were updated? Select all that apply:
 - Not applicable.
 - 5.1.2 Describe the changes made to the original submission, including the sections of the original report that were revised or any changes made to questionnaire responses:
 - Not applicable.
6. For entities only: Business number(s) (if applicable, provide the business number of the entity completing this questionnaire):
 - Business number: 86352 1258 RC0001.

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7. For entities only: Is this a joint report?
- No.
- 7.1 If yes, state the legal name of each entity covered by this report:
- Not applicable.
- 7.2 Identify the business number(s) of each entity covered by this report (if applicable):
- Not applicable.
8. For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?
- No.
- 8.1 If yes, select the applicable law(s). Select all that apply:
- Not applicable.
9. For entities only: Which of the following categories apply to the entity? Select all that apply:
- Canadian business presence (select all that apply):
 - » Has a place of business in Canada: Yes.
 - » Does business in Canada: Yes.
 - » Has assets in Canada: Yes.
 - Meets size-related thresholds (select all that apply):
 - » Has at least \$20 million in assets for at least one of its two most recent financial years: Yes.
 - » Employs an average of at least 250 employees for at least one of its two most recent financial years: Yes.

10. For entities only: In which of the following sectors or industries does the entity operate?
Select all that apply:
- Other, please specify: Nuclear waste management.
11. For entities only: In which country is the entity headquartered or principally located?
- Canada.
- 11.1 If in Canada: In which province or territory is the entity headquartered or principally located?
- Ontario.
12. For government institutions only: Is this a report for a parent federal Crown corporation or a wholly owned subsidiary?
- Not applicable.
- 12.1 If yes, in which of the following sectors or industries does the parent federal Crown corporation or wholly owned subsidiary operate? Select all that apply:
- Not applicable.
- 12.2 If yes, in which province or territory is the parent federal Crown corporation or wholly owned subsidiary headquartered or principally located?
- Not applicable.

Part 2 – Annual report

Reporting for entities

1. Which of the following accurately describes the entity's structure?
 - Corporation (not-for-profit).
2. Which of the following accurately describes the entity's activities? Select all that apply:
 - Importing into Canada goods produced outside Canada.
3. What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply:
 - Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily.
 - Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains:
 - » We have relied on our contractual terms to meet all Canadian regulatory requirements.
 - » Our Code of Conduct expects suppliers to abide by the high ethical standards (outlined in response number 4 thereafter).
 - Requiring suppliers to have policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains:
 - » Current NWMO standard terms and conditions include a specific section outlining supplier requirements with compliance with applicable laws, code of conduct and NWMO policies.
 - Developing and implementing grievance mechanisms to address complaints in the workplace:
 - » The NWMO Code of Conduct allows for reporting concerns to the Chief Ethics Officer by phone, letter, email at ChiefEthicsOfficer@nwmo.ca or alternative method. Alternatively, concerns can be reported anonymously by contacting Integrity Counts, our confidential ethics reporting system, via toll free number at 1.866.921.6714, online at www.integritycounts.ca/org/nwmo or email at nwmo@integritycounts.ca.

4. Please describe the steps the entity has taken to prevent or reduce risks of forced labour or child labour in its supply chains (if applicable):
- The NWMO's Code of Conduct includes the following, and the organization expects its suppliers to abide by these high ethical standards:

“The NWMO is committed to conducting our business in a socially and environmentally responsible manner, respecting all applicable laws, Indigenous culture and the human rights of the communities we work with. We are committed to meeting all applicable regulatory standards and requirements for protecting the health, safety and security of people and the environment.

It is expected that you:

 - » Learn from and respect the cultures and communities you work in;
 - » Engage with Indigenous communities and members of the public in a respectful, ethical and sensitive matter, respecting individual human rights and the human rights of communities we work with;
 - » Not tolerate human rights abuses or be complicit in any actions that contribute to such abuse; and
 - » Comply with all applicable environmental laws, regulations, codes and standards.

If you have concerns that a supplier or other business partner may not be meeting our standards for social responsibility and ethical conduct, you should report such concerns to the Vice-President of Human Resources and Chief Ethics Officer.”
5. Does the entity currently have policies and/or due diligence processes in place related to forced labour and/or child labour?
- No.
- 5.1 If yes, which elements of the policies and/or due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply:
- Not applicable.
6. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?
- Yes, we have identified parts of our activities and/or supply chains that carry risks to the best of our knowledge and will continue to identify emerging risks.
- 6.1 If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply:
- Procurement of promotional items.
 - Tier two suppliers.

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7. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply:
- Retail trade:
 - » Furniture, home furnishings, electronics and appliances retailers.
 - » General merchandise retailers.
 - » Clothing, clothing accessories, shoes, jewelry, luggage and leather goods retailers.
8. Please provide details on the parts of the entity's activities and supply chains where the entity has identified a risk of forced labour or child labour, and describe the actions taken to assess and manage those risks (if applicable):
- Identified area of highest risk being the sourcing of promotional materials, where the spend for 2025 was approximately \$175,000.
9. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?
- No, we have not taken measures.
- 9.1 If yes, which remediation measures has the entity taken? Select all that apply:
- Not applicable.
10. Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains?
- No, we have not taken measures.
11. Does the entity currently provide training to employees on forced labour and/or child labour?
- No.
- 11.1 If yes, is the training mandatory?
- Not applicable.
12. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?
- No.
- 12.1 If yes, what method does the entity use to assess its effectiveness? Select all that apply:
- Not applicable.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Board Chair, attest that I have reviewed the information contained in the report on behalf of the NWMO's Board of Directors.

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 within this report.





Glenn Jager
Board Chair

I have the authority to bind the NWMO.

Date: May 7, 2026

**For more information,
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