Fighting Against Forced Labour and Child Labour Report

2023

FirstLight

Who We Are

FirstLight is a leading clean power producer, developer, and energy storage company serving North America. With a diversified portfolio that includes over 1.6 GW of operating renewable energy and energy storage technologies and a development pipeline with 4+ GW of solar, battery, hydro, onshore wind and offshore wind projects, FirstLight specializes in hybrid solutions that pair hydroelectric, pumped-hydro storage, utility-scale solar, large-scale battery, and wind assets.

The company's mission is to accelerate the decarbonization of the electric grid by supporting the development, operation, and integration of renewable energy and storage to meet the world's growing clean energy needs and deliver an electric system that is clean, reliable, affordable, and equitable.

Based in Burlington, MA, with operating offices in Northfield, MA, New Milford, CT, Oshawa, ON, and Montréal, QC, FirstLight is a steward of more than 14,000 acres and hundreds of miles of shoreline along some of the most beautiful rivers and lakes in North America. FirstLight has been wholly owned by the Public Sector Pension Investment Board (PSP Investments) since 2016.

Why We're Reporting

This report represents FirstLight Holding Inc.'s ("FHI", "FirstLight", "our" or "we") inaugural report on forced and child labour in supply chains, as required by Canada's new Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"). We file this report as a wholly-owned subsidiary of PSP Investments, a government institution. This report covers all of FHI's wholly-owned subsidiaries.

This report is made pursuant to the Act and was approved by the FirstLight Board of Directors on May 23, 2024.

FirstLight is dedicated to upholding human rights principles and providing a fair and ethical workplace for all. We are committed to consistent and thorough oversight of child labour and forced labour risks, mitigating those risks, and conducting swift, exhaustive remediation where necessary.

Our Approach to Assessing Risk and Remediation

FirstLight has not identified the use of forced or child labour within its business, and due to the attenuated likelihood of such risk within its business, FirstLight has taken the below-described actions, to date:

Policies and Due Diligence Processes

- FirstLight has, on a limited basis, implemented internal policies or due diligence processes in relation to forced and child labour. FirstLight will revise its code of conduct to include anti-forced and child labour provisions and will also incorporate inquiries regarding forced and child labour into its vendor and transaction due diligence processes.

Activities, Supply Chains, Remediation, Training and Measuring Effectiveness

- Given the nature of FirstLight's business activities (i.e., producing electrons from renewable resources) and its supply chain (i.e., local labour forces operating and maintaining complex facilities), FirstLight believes that the risk of use of forced labour and child labour within its activities and supply chains is extremely low and, accordingly, has not formally assessed, managed, remediated or provided training in relation to such risk and has not actively measured the effectiveness of ensuring such labour is not being used in its activities and supply chains.
- In its U.S. operations, FirstLight requires vendors that provide parts, supplies and materials to represent and warrant that they are in compliance with rules of international law and national law, including fundamental human rights, and in particular, the prohibition of using child labour and any form of forced or compulsory labour. Going forward, FirstLight will incorporate similar provisions in all of its contracts, including all contracts in FirstLight's Canada operations. In addition, FirstLight will explore company-wide training opportunities so as to educate all employees regarding forced and child labour.

Remediation Measures for Loss of Income to Most Vulnerable Families

- FirstLight has not identified any forced or child labour in its workforce or supply chain; therefore, FirstLight has not taken any measures to remediate the loss of income to the families impacted by any FirstLight effort to eliminate the use of forced labour or child labour.

FirstLight is committed to developing more robust processes to prevent forced labour and child labour in its workforce and supply chains and will continue to monitor its supply chains and the potential for forced labour and child labour risk and ensure that if any such risk is identified, appropriate internal mechanisms are implemented to address such risk.