

Fighting Against Forced Labour and Child Labour Report

2024



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.

FirstLight has been wholly owned by the Public Sector Pension Investment Board (PSP Investments) since 2016. With offices in Oshawa, ON, Montréal, QC, Burlington, MA, Northfield, MA, New Milford, CT and Adrian, PA, FirstLight stewards more than 14,000 acres and hundreds of miles of shoreline.



Why We're Reporting

This report represents FirstLight Holding Inc.'s ("FHI", "FirstLight", "our" or "we") second annual report on forced and child labour in supply chains, as required by Canada's 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.

This report is made pursuant to the Act and was approved by the FirstLight Board of Directors on May 22, 2025.

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 implemented internal policies and due diligence processes in relation to forced and child labour. FirstLight is revising its code of conduct and developing a supplier code of conduct, which, in both cases, will include anti-forced and child labour provisions. FirstLight has also incorporated inquiries regarding forced and child labour into its vendor and transaction due diligence processes.

Activities, Supply Chains, Remediation, Training and Measuring Effectiveness

- 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. FirstLight is incorporating similar provisions in all of its new and renewed contracts, including all new and renewed contracts in FirstLight's Canada operations. In addition, FirstLight is exploring training opportunities so as to educate employees whose functions and responsibilities may involve recognizing or addressing forced and child labour risks.

- FirstLight has conducted a preliminary assessment of its potential exposure to forced and child labour within its business. Based on FirstLight's assessment and the nature of FirstLight's business activities (i.e., producing electrons from renewable resources) and its labor and equipment supply chains (i.e., local labour forces operating and maintaining complex facilities and replacement equipment and parts sourced primarily from supply chains located in lower risk jurisdictions), FirstLight believes that the risk of use of forced labour and child labour within its activities and supply chains is relatively low. However, FirstLight will continue to review the risk of the use of forced labour and child labour in its supply chains and to implement additional steps to identify and, where applicable, reduce the risk of vendors or suppliers using forced or 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.