Hydro One's Statement Against Modern Slavery

About this Statement

Hydro One is committed to treating everyone who works at or with Hydro One with dignity and respect. We expressly prohibit the use of modern slavery within our labour force and supply chain. We define modern slavery to mean the severe exploitation of other people for personal or commercial gain. This covers a range of concepts including slavery, forced or compulsory labour, child labour and human trafficking.

In this statement, "Hydro One", the "Company", "we", "us" and "our", means, collectively, **Hydro One Limited, Hydro One Inc., Hydro One Networks Inc., Hydro One Remote Communities Inc, B2M Limited Partnership, and Acronym Solutions Inc.**, the entities that are making this joint report in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Modern Slavery Act) with respect to their activities during the financial year ended December 31, 2025. Hydro One Limited directly or indirectly controls each of the relevant entities.

About Hydro One

Hydro One Limited, through its wholly owned subsidiaries, is Ontario's largest electricity transmission and distribution provider, safely and reliably serving customers throughout Canada's largest province. Guided by our purpose of energizing life in Ontario, we look to the future while helping benefit all Ontario in the energy transition today.

Our Rate-Regulated Business[1]

Our transmission system transmits high-voltage electricity generated by a mix of private and government-owned sources[2] – nuclear, hydroelectric, natural gas, wind and solar – to local distribution companies and industrial customers across Ontario. With 30,000 circuit kilometres of high-voltage transmission lines and 25-cross-border interconnections with neighbouring provinces and the U.S., it accounts for 91 per cent [3]of Ontario's transmission capacity.

We're also the largest distributor in Ontario, with 126,000 circuit kilometres of primary low-voltage lines serving 1.5 million customers, mostly in rural areas. Hydro One Remote Communities Inc. serves customers in 15 grid-connected communities and 12 off-grid communities in Ontario's far north.

Our Other Businesses

- Acronym Solutions Inc. offers a comprehensive suite of information and communications technology.
- Ivy Charging Network™ provides Electric Vehicle charging network services.
- AUX Energy Inc. provides energy solutions to commercial and industrial clients.

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[1] Numbers related to transmission capacity, length of transmission, distribution lines and customers are approximate.

[2] Ontario's sources of power are managed by the province's Independent Electricity System Operator (IESO).

[3] Based on the network component of the revenue requirement approved by the Ontario Energy Board (OEB). Hydro One owns and operates 94% of the transmission system in Ontario when based on the total OEB approved revenue requirement.

Our Supply Chain

Who We Are

Hydro One's supply chain is a centralized functional group that oversees procurement activities. This includes contract management, supplier risk and relationship management, competitive vendor selection process, new vendor screening and onboarding, supplier surveillance and inspection services, supply chain logistics and warehouse management, and accounts payable services.

Hydro One strives to be a supply chain leader through programs and technologies that protect people, promote efficiency, and manage impacts on the environment. We proactively seek opportunities to create strategic partnerships with suppliers who share our vision of safety and sustainability. Our Supplier Code of Conduct establishes standards of behavior for all our suppliers.

Supply Chain Mission and Approach

The supply chain group aims to understand and support material and service requirements for all of Hydro One's lines of business. The supply chain group develops sourcing strategies supported by detailed category analytics to help address stakeholders' needs while driving value for Hydro One through strategic procurement decisions. The following practices support the supply chain group and its management of the risk of forced labour and child labour.

Hydro One considers factors beyond price and evaluates suppliers based on total cost of ownership and a range of non-price factors. The supply chain group supports the business in finding suppliers that deliver the greatest value for Hydro One while aligning with our values.

Through supplier performance management and governance, Hydro One negotiates terms and contractual language that help mitigate risks and helps ensure Hydro One's interests are protected. This includes terms requiring compliance with our Supplier Code of Conduct. Hydro One requires vendors meet financial, health & safety, insurance, and anti-forced labour and child labour requirements.

Our Goods and Services

As a provider of essential services to Ontario, Hydro One interacts and conducts business with a variety of suppliers. In 2025, Hydro One procured approximately $3.0B in goods and services.

Below is a list of the significant categories of goods and services procured by Hydro One:

- Construction & maintenance which includes engineering procurement construction, construction service & materials, and rentals & operated equipment.
- Electrical equipment which includes transformers, circuit breakers, switchgear, wire, cable, conductor and components.
- Corporate services covering consulting, facilities maintenance, real estate services, travel and logistics, finance, human resources, legal, administrative services.

Operational and Supply Chain Risks

Identifying Risks

Hydro One assesses risks within our operations and our supply chain including the risk of forced labour and child labour. The assessment examines both internal and external risks. The potential for forced labour and child labour was assessed as low. The focus of this Statement is on external risks, as the higher potential for risk for forced labour and child labour is from our external supply chains.

Internal Risk

Internal risk is the risk of forced labour and child labour within Hydro One's operations, and this risk has been deemed low. The majority of Hydro One employees are unionized and trained, skilled, and qualified to perform the operation and maintenance of the electrical grid while the remaining employees are qualified management professionals and knowledge workers. All employers including Hydro One, and their employees, are subject to Ontario and Canadian laws and regulations which prohibit forced labour and child labour. Hydro One actively monitors and addresses human rights issues under various policies and procedures including our Code of Business Conduct and Health and Safety Policy. We promote our core values to create a positive culture where employees understand their rights and feel confident speaking up.

External Risks

External risk is the risk of forced labour and child labour associated with our supply chain, including contractor and geographical risks. Based on information available to Hydro One at this time, external supply chain risks have been deemed to be low.

- Contractor Risk

  Contractor risk is the risk that our contractors engage in forced labour and child labour in providing services to Hydro One. Contractor services are procured through companies and individuals that are subject to the laws and regulations of Canada and Ontario which prohibit forced labour and child labour. In addition, Hydro One has health and safety policies and procedures including the Supplier Code of Conduct with which contractor companies declare compliance before conducting business with Hydro One.

- Geographical Risk

  Approximately 91% of Hydro One's procurement spend is with direct suppliers based in Canada, while approximately 8% of the spend is with direct suppliers based in United States.[1]

Country	% of Procurement Spend
Canada	91.3%
USA	8.1%
Others (Europe, Asia)	0.6%

[1] Supplier's base country is based on supplier's registered location.

Approach to Risk Mitigation

Hydro One takes the following approaches to mitigate forced labour and child labour risks in its supply chain, including:

- Establishment of a wide-ranging framework that includes policies and procedures to guide and regulate Hydro One suppliers.
- Day-to-day operations are underpinned by due diligence activities. This involves continuous monitoring and assessing Hydro One's supply chain.
- Supplier risk assessments are conducted at the time of contract initiation or extension.
- Each of these risk mitigation methods plays a key role in helping ensure our commitment to ethical sourcing.

Hydro One Modern Slavery Risk Governance

Governance Structure

Hydro One has adopted a human rights oversight and management structure to help ensure accountability at all levels of the Company.

Board Oversight: Hydro One's Board of Directors (the "Board") has four standing committees – the Audit Committee, Indigenous Peoples, Safety & Operations Committee, Governance and Regulatory Committee, and Human Resources Committee. The Board reviews and approves the Company's annual Statement Against Modern Slavery and receives updates on human rights-related topics. Updates include presentations and education sessions on supply chain risks and forced labour and child labour reporting requirements.

Policies and Standards

Hydro One utilizes a framework of policies, procedures, and standards to set expectations and manage our supply chain risks and help mitigate forced labour and child labour risks in our operations and our supply chains. Regular reviews are conducted to assess our progress, helping ensure the relevance and adaptability of these policies, procedures, and standards.

- Code of Business Conduct
  The Code of Business Conduct applies to all Hydro One employees, directors, and business partners. The Code of Business Conduct defines how employees, directors, and business partners of Hydro One should act. It outlines Hydro One's core values and helps ensure Hydro One and its employees are behaving ethically and responsibly. In particular, the Code of Business Conduct provides our expectations with respect to health and safety and compliance with all applicable laws, rules and regulations relevant to each person's Hydro One. All employees, directors and business partners are expected to comply with the Code of Business Conduct, report any

violations of the Code of Business Conduct and ask questions when in doubt. In addition, supervisors and managers are expected to report any unethical behaviour to the Corporate Ethics Office and provide guidance to employees.

- Supplier Code of Conduct
  To make informed purchasing decisions that are aligned to our core values and mitigate risk, we have developed and published a Supplier Code of Conduct, which outlines our requirements to suppliers. The Supplier Code of Conduct requires all Hydro One suppliers to comply with Canadian labour and employment laws including strict prohibitions on the use of all forms of modern slavery including child labour, forced labour and human trafficking. All Hydro One suppliers are required to read, comply with and report violations of the Supplier Code of Conduct. Hydro One has the right to audit compliance with the Supplier Code of Conduct. The Supplier Code of Conduct contains whistleblower protections similar to the Whistleblower Policy.

- Whistleblower Policy
  The Whistleblower Policy sets out the procedures for representatives and business partners to report violations or potential or suspected violations, of the Code of Business Conduct, applicable laws and other matters.
  These procedures include the receipt, retention and treatment of complaints received by Hydro One regarding violations of the Code of Conduct and the confidential, anonymous submission by representatives.

Due Diligence

In 2025, Hydro One reviewed the modern slavery statements of utility peers. We believe that Hydro One's practices are appropriate, are consistent with the best practices of leading Canadian public companies, align with industry direction, and demonstrate our commitment to continued improvement.

Hydro One conducts due diligence activities across the procurement process, specifically designed to mitigate forced labour and child labour risks and enhance business operations. Due diligence activities at various stages of procurement are outlined below:

- Prior to entering into a contract:
  - Vendor Screening Processes
    Upon vendor registration in our system, vendors are required to complete a questionnaire. This questionnaire encompasses a review of Hydro One's Supplier Code of Conduct, requiring vendors to acknowledge and declare their compliance with the Supplier Code of Conduct. This standardized process is obligatory for all vendors registered in our system.

  - RFP (Request for Proposal) Questionnaire
    Upon invitation to Hydro One's RFx (Request for Proposal/Information/Quotes) events, vendors are required to complete a questionnaire. This questionnaire encompasses a review of Hydro One's Supplier Code of Conduct, requiring vendors to acknowledge and

declare their compliance with the Supplier Code of Conduct. This standardized process is obligatory for all vendors participating in our RFx events. The RFx questionnaire templates require suppliers to provide procurement and governance policies related to modern slavery.

- Contract Terms and Conditions
  Within Hydro One's standard contract terms and conditions, it is a mandatory requirement for all suppliers to provide acknowledgement that they have read and agree to comply with Hydro One's Supplier Code of Conduct. The standard contract terms and conditions includes language that reinforces our commitment to eradicating modern slavery in our supply chains, which includes a termination clause which grants Hydro One the right to terminate agreements with suppliers found to be engaged in practices related to modern slavery.

- Supplier Risk Assessment Tool
  Hydro One Supply Chain utilizes an application to manage supplier risk that provides real time and actionable supplier risk information. The tool generates an automated risk scorecard using artificial intelligence and advanced analytics and scores each supplier on overall risk and on six established risk domains including financial, cyber, environmental/social, catastrophic, geopolitical, and restrictions. Forced labour and child labour are assessed through environmental/social and geopolitical factors.

- Pre-Award Inspection Program
  During the RFx process, an inspection of the supplier may occur validating supplier capabilities and potential risks that might not be known during the negotiation stages of new contracts. The program consists of a series of monitoring activities performed during visits to a supplier's plant(s) at various times during the manufacturing cycle of the product. If any risks of forced labour or child labour are detected, they are documented, and further investigation would occur.

- Throughout the term of the contract
  - Supplier Performance & Quality Assurance Inspection Program
    Inspections may also occur with existing suppliers to assess performance and examine for quality assurance. During the inspections, surveillance activities including records review, test witness and quality inspections are performed to help ensure the inspected supplier plant complies with Hydro One specifications and to report any potential forced labour or child labour violations if observed.

  - Supply Chain Risk Council
    The Supply Chain Risk Council is a standing committee of supply chain leaders that meet quarterly to discuss emerging and continuing risks to Hydro One arising from its supply chain operations as well as progress on risk management plans in execution. The Council

helps enable early identification of risks and provides a forum for a collaborative discussion across teams on potential impacts of risk events including severity and probability and risk mitigation efforts required. Any new forced labour or child labour risks would be brought to this Council to plan mitigative actions and discuss potential long-term improvements.

- Review of Sanctions
  Hydro One performs sanctions and restricted party screening through checking our vendor list against several sanctions and government lists for violations such as forced and child labour. This monitoring is continuous, and the vendor list is updated twice annually by Supply Chain.

- Monitoring of Suppliers
  - Hydro One partners with a third-party provider for an alert system that identifies and addresses potential modern slavery violations related to our suppliers across the world. This system enables reporting of potential incidents related to modern slavery on a regular basis. Hydro One reviews alerts generated by the system, taking appropriate action in accordance with our policies and ethical standards.

  - In 2025, Hydro One conducted a survey through a third-party provider that asked suppliers about their modern slavery-related policies and practices. Over 330 participants completed the survey, and the findings indicate a moderate awareness about modern slavery requirements across Hydro One's supply chain. Results showed a high variability across the suppliers regarding the presence of policies, processes, and training.

  - In 2025, Hydro One also introduced a Canada First procurement strategy to strengthen the national economy and promote local employment while maintaining partnerships with trusted global suppliers. By prioritizing Canadian-based sourcing and requiring suppliers to disclose ownership, sourcing locations, and labour practices, we increased transparency and accountability. These measures helped ensure that goods and services provided to Hydro One are produced ethically and align with our commitment to human rights and responsible business practices, while strengthening the Canadian economy.

Measuring Effectiveness

Hydro One is committed to continuous improvement and measuring the effectiveness of our risk mitigation and due diligence actions. We measure the effectiveness of our modern slavery response based on the following:

- Vendors with procurement spend exceeding $25,000 are assessed through Dun & Bradstreet, a service which monitors worldwide sanction lists; none of Hydro One's suppliers have appeared on these sanction lists.
- We conducted reviews of top spend suppliers and reviews of potential modern slavery alerts.

- Suppliers are mandated to acknowledge and declare their compliance with the Supplier Code of Conduct which specifically calls out the prohibition of forced labour and child labour.
- As part of our contract renewal and supplier risk assessment process, we produce and review supplier risk scorecards.

Continuous Improvement

Training

Hydro One provides annual mandatory training sessions to all employees on our Code of Business Conduct and anti-fraud and anti-corruption. The sessions provide employees with a deeper understanding of ethical standards, helping ensure alignment with our organization's core values. The Code of Business Conduct training reinforces the principles that guide our business practices, helping to foster a culture of integrity and accountability. The anti-fraud and anticorruption training provides employees with knowledge and tools to identify, prevent and respond to fraudulent activities and corrupt practices. Hydro One also provides modern slavery awareness training to supply chain employees.

Regular Review and Evaluation

All Hydro One policies and standards, operational processes and procedures, and training content are regularly reviewed and updated to reflect emerging risks, legal requirements, and industry standards. Feedback mechanisms from employees are integrated to refine business practices and to help ensure their effectiveness.

Non-Compliant List

If a supplier is found to have engaged in or have used forced or child labour in their supply chains, the supplier will be added to Hydro One's internal non-compliant list. This list is reviewed prior to entering into new business relationships, as well as all existing active suppliers, to help ensure Hydro One has no business relationship with suppliers on the non-compliant list. As no instances of forced or child labour have been identified, there are currently no suppliers on the list

Remediating Modern Slavery

Given the limited risk of forced labour and child labour in our supply chain and operations, and no cases of either forced labour or child labour discovered, no remedial measures have been required. If a potential case is discovered, Hydro One will take the appropriate steps with the supplier to remediate and implement corrective action, which may include terminating our relationship with that supplier.

Forward-Looking Statement

This Statement on Modern Slavery may contain "forward-looking information" within the meaning of applicable securities laws, including statements regarding: Hydro One's commitments with respect to its employees; Hydro One's purpose and the energy transition; the supply chain group's outcomes; Hydro One's commitment to continuous improvement and measuring the effectiveness of its risk mitigation and due diligence actions; and, the steps Hydro One would take in the event it discovers forced labour or child labour in its supply chain. Words such as "expect", "potential", "continues", "should", "anticipate", "intend", "attempt", "may", "plan", "will", "can", "believe", "seek", "estimate", and variations of such words

and similar expressions are intended to identify such forward-looking information. These statements are not guarantees of future performance or actions and involve assumptions and risks and uncertainties that are difficult to predict. Therefore, actual outcomes and results may differ materially from what is expressed, implied or forecasted in such forward-looking information. Some of the factors that could cause actual results or outcomes to differ materially from the results expressed, implied or forecasted by such forward-looking information, including some of the assumptions used in making such statements, are discussed more fully in Hydro One's filings with the securities regulatory authorities in Canada, which are available on SEDAR+ at www.sedarplus.com. Hydro One does not intend, and it disclaims any obligation, to update any forward-looking information, except as required by law.

Attestation

This Modern Slavery Statement was approved by the Board of Directors of Hydro One Limited on behalf of Hydro One on May 13, 2026 in accordance with section 11(4)(b)(ii) of the Modern Slavery *Act*.

David Lebeter
President and CEO
I have the authority to bind Hydro One Limited.
May 20, 2026