

Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211)

Annual Report for the Financial Year Ending
31 March 2026

WCLC

1. Organizational Structure, Activities, and Supply Chains

Western Canada Lottery Corporation (WCLC) is a non profit corporation incorporated under the Canada Corporations Act. WCLC is authorised to manage and conduct lottery activities as agent for its Members, the provincial governments of Alberta, Saskatchewan, and Manitoba, and the territorial governments of Nunavut, Yukon, and the Northwest Territories, pursuant to the Western Canada Lottery Agreement.

WCLC operates within a regulated public sector gaming framework, delivering lottery gaming on behalf of its provincial and territorial partners and, in Saskatchewan, operating video lottery terminal (VLT) gaming under provincial authority. Its operations are predominantly service based. While WCLC does not manufacture goods or extract raw materials, it relies on a range of goods and services to support lottery operations across its jurisdictions and VLT operations in Saskatchewan.

Key supply chain categories include:

- lottery operations, including lottery products delivered through retail and digital channels;
- video lottery terminal (VLT) operations;
- retail network support across three provinces;
- player care services and prize administration; and
- corporate and professional services.

WCLC's supply chain includes suppliers providing:

- printed lottery products, including instant tickets;
- gaming systems and software;
- lottery and VLT terminals, peripherals, and associated equipment;
- telecommunications and network services;
- logistics and distribution services; and
- professional, advisory, and support services.

These suppliers are primarily located in Canada, the United States, and Europe—jurisdictions that generally maintain established labour standards and regulatory oversight.

As a lottery organization that does not manufacture goods or source raw materials directly, WCLC's exposure to forced labour and child labour risk is shaped primarily by its reliance on third party suppliers rather than direct production activities. Accordingly, this report focuses on areas where WCLC can reasonably identify, assess, and influence potential risks within its supply chain.

2. Why Bill S-211 Applies to WCLC

WCLC meets the definition of a “reporting entity” under the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the following reasons:

- WCLC is federally incorporated and meets the size and financial thresholds set out in the Act;
- WCLC procures goods, including printed lottery products, gaming equipment, and VLT hardware; and
- the Act applies irrespective of whether an organization operates on a for profit or non profit basis.

3. Policies and Due Diligence Processes

WCLC is committed to ethical business practices and compliance with all applicable laws, including those prohibiting forced labour and child labour.

Its approach to responsible sourcing is grounded in existing governance, procurement, and oversight frameworks consistent with its role as a publicly regulated non-profit gaming organization.

Key elements of this framework include:

Code of Conduct

Establishes expectations for ethical behaviour, integrity, and compliance with applicable laws across WCLC’s operations.

Procurement Policy

Governs the acquisition of goods and services, emphasising fairness, transparency, value, and supplier compliance with applicable legal and regulatory requirements.

Whistleblower Policy

Provides secure and confidential avenues for employees, suppliers, and members of the public to report suspected unethical or unlawful behaviour, including concerns related to supply chain practices. The policy includes protections against retaliation.

Contractual Controls

Supplier agreements require compliance with applicable laws and standards as a condition of doing business with WCLC.

WCLC does not currently operate a standalone forced labour or child labour due diligence framework. However, its procurement, contracting, and governance processes provide a practical foundation for identifying and managing relevant risks within the context of its operations.

WCLC expects suppliers and service providers to comply with all applicable laws, including those prohibiting forced labour and child labour. Suppliers that engage subcontractors are expected to apply these requirements within their own operations and subcontracted activities.

4. Forced Labour and Child Labour Risks

WCLC's core operations are conducted in Canada within a highly regulated public sector environment, and the organization does not manufacture goods or source raw materials directly. As a result, potential risks related to forced labour and child labour are more likely to arise upstream within supplier operations, particularly where:

- printed materials or other goods include components manufactured outside Canada;
- technology, terminals, or electronics rely on complex, multi-tier supply chains; or
- goods originate from jurisdictions with differing labour standards or enforcement regimes.

At the time of reporting, WCLC has not identified any specific instances of forced labour or child labour within its operations or supply chains. However, WCLC recognises that the absence of identified incidents does not eliminate underlying risk, particularly within global or multi tier supply chains that are outside its direct control.

5. Measures Taken to Assess and Address Risks

During the reporting period, WCLC undertook the following measures to identify and manage potential forced labour and child labour risks within its supply chain:

- reviewed key supplier categories to identify areas where forced labour or child labour risk may be elevated, including printed products and technology-related procurements;
- confirmed that WCLC's primary suppliers operate predominantly in jurisdictions with established labour standards and regulatory oversight;
- continued to apply procurement and contracting requirements that obligate suppliers to comply with all applicable laws;
- maintained confidential reporting and escalation mechanisms through its whistleblower framework; and
- monitored federal guidance and emerging expectations associated with the implementation of Bill S-211.

No instances of forced labour or child labour were identified through these measures, and no remediation actions were required during the reporting period.

6. Training

WCLC provides general guidance and training related to ethical conduct, governance, and legal compliance.

As its approach to supply chain risk management evolves, WCLC will assess the value of targeted training for employees involved in procurement and contracting. This may include building awareness of potential forced labour and child labour risk indicators, supplier expectations, and internal escalation and reporting processes.

7. Assessing Effectiveness

WCLC has not yet established formal metrics to assess the effectiveness of its measures related to preventing forced labour and child labour.

As its approach matures, WCLC will consider proportionate ways to support internal review and continuous improvement. Potential indicators for internal consideration may include:

- the extent to which supplier contracts include provisions requiring compliance with applicable laws;
- the application of additional supplier expectations in connection with higher risk goods or services; and
- any concerns raised through existing reporting mechanisms and how they are addressed.

WCLC recognises that its approach to managing supply chain risks related to forced labour and child labour will continue to evolve.

Areas of future focus may include:

- further integration of labour rights considerations into procurement practices;
- ongoing engagement with vendors and partners, where appropriate;
- consideration of practices emerging across Canadian lotteries and Crown corporations; and
- periodic review of relevant policies and controls.

8. Approval and Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the *Act*), and in particular section 11 thereof, I, in the capacity of **President and Chief Executive Officer**, attest that I have reviewed the information contained in this report on behalf of the governing body of **Western Canada Lottery Corporation**.

Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate, and complete in all material respects for the purposes of the *Act*, for the reporting year identified in this report.

Chris Santschi

President & CEO

Western Canada Lottery Corporation

Date: May 13, 2026

Signature:



I have the authority to bind Western Canada Lottery Corporation.