



**Atlantic | Loto  
Lottery | Atlantique**

# **Report on Fighting Against Forced Labour and Child Labour in Supply Chains**

**2024-25**

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### 1. Introduction

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This report is produced by Atlantic Lottery Corporation (“Atlantic Lottery”) for the Financial Year Ending March 31, 2025.

This report constitutes the second report prepared by Atlantic Lottery pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act)*.

### 2. Addressing Forced Labour and Child Labour

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Atlantic Lottery is committed to engaging in practices that meet all ethical and legal standards related to forced labour and child labour in the markets in which it operates.


Atlantic Lottery’s vision is to be: “Atlantic Canada’s first choice for lottery and gambling, dedicated to healthy play and maximizing community impact.”

Atlantic Lottery values ‘Social Responsibility’ and ‘Integrity’. As a socially responsible corporation, Atlantic Lottery recognizes the importance of addressing forced labour and child labour risks within its supply chain.

Atlantic Lottery also endeavours to be an open and transparent organization and makes many of its corporate records available to the public. Further information on our commitment to transparency is available [on our website](#).

During the reporting period, we implemented targeted measures to prevent and reduce the risk of forced labour and child labour in our business and supply chains:

- a. Continued Engagement with Supply Chain Partners:** Building on last year’s efforts to raise awareness about the Forced Labour and Child Labour Act and



its implications, we maintained communications with our strategic and critical vendors from June to August 2024. Our engagement included:

- **Risk Mitigation Measures:** Vendors described steps to identify and manage forced labour risks; sharing reports where applicable.
- **Transparency and Reporting:** Vendors disclosed any known risks associated with specific suppliers or regions.
- **Compliance Confirmation:** Vendors confirmed their awareness of the Act and their compliance status (as applicable).

Through this engagement, there were no identified incidents of forced labour or child labour during the reporting period by these vendors.

**b. Internal Awareness:** Within our organization, we've continued to share information about the Forced Labour and Child Labour Act and its expected impact on supply chain processes. In our communications, we have highlighted updates contained in this report and have provided information on the impacts to our teams and guidance to help manage any changes observed in our public bidding and subsequent contracts.


**c. Training Modules:** With the expansion of our Modern Slavery Catalogue of learning modules, we made participation in these modules mandatory for all members of the Supply Chain team, with completion tracked within our performance management platform. We have further integrated this training into our employee onboarding documentation for all Supply Chain members, ensuring mandatory participation. All have been completed. Additionally, we have offered targeted training to other departments within the organization, making the modules available to all employees.


**d. Supply Chain Documentation:** We have updated all supply chain documentation in relation to changes made and enhanced our Vendor Management Standard, which now requires all strategic and critical vendors to engage with ALC annually to determine if there have been any incidents of forced labour or child labour within their supply chains.

**e. Ethics Hotline Services:** Atlantic Lottery's reputation is built on public trust and confidence. Maintaining this trust requires a commitment to act with integrity. Our long established Ethics Hotline remains in place. This is an independent, confidential, and anonymous reporting system to provide a means to report suspected unethical, illegal, or fraudulent activities, or other serious wrongdoing.

We enhanced the language to explicitly include the Forced Labour and Child Labour Act, emphasizing that the Ethics Hotline can be used to report any suspected instances of forced labour or child labour.

**f. Supplier Code of Conduct:** In January 2025, we developed and implemented a comprehensive Supplier Code of Conduct to address issues related to forced labour





and child labour. ALC expects all suppliers, including their subcontractors and manufacturers, to adhere to this Code of Conduct. By entering into a contractual agreement with ALC, suppliers are accepting terms outlined in the Supplier Code of Conduct.

The Code of Conduct encompasses actions related to human rights, employment standards, forced labour and child labour, remediation, due diligence, ESG initiatives and other aspects of responsible business conduct. This initiative was completed in consultation with subject matter experts across the organization.

#### **g. Vendor Mapping:**

Although we have not identified any incidents of forced labour or child labour in our activities and supply chains, we remain committed to enhancing our monitoring and prevention efforts. We have reviewed and updated our Third-Party Risk assessment questionnaires and began collaborating with external partners in FY25 to enhance modules for better tracking of our vendors. We aim to have these modules updated by the end of our fiscal 2026.

In support of this planning and research activity, we utilized data from Walk Free.org (2024) to focus on the top five imported products at risk of modern slavery: electronics (laptops, computers, and mobile phones), garments, gold, sugar, and textiles. These products were mapped to our active contracts within our supply chain. This analysis highlighted examples of products, industries, and associated risks, aiming to raise awareness and track these issues within our tools and systems moving forward.

### **3. Structure, Activities and Supply Chains**


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Atlantic Lottery is a publicly owned corporation, headquartered in Moncton, New Brunswick. It provides government-regulated and responsible lottery products to adults in the Atlantic Canadian region who choose to participate. The corporation operates various lottery games, both online and through a network of retail partners, including Lotto Max, Lotto 6/49, Daily Grand, and a variety of instant win games.

In addition to these, Atlantic Lottery also operates two Red Shores horse racing and gaming venues in P.E.I., offering a range of gaming options and contributing to the diverse portfolio of Atlantic Lottery.

Atlantic Lottery's operations span across the four Atlantic provinces: New Brunswick, Prince Edward Island, Nova Scotia, and Newfoundland and Labrador. The corporation strives to create a diverse and inclusive culture everywhere it operates.

The corporation's products are distributed through a network of retail partners across the Atlantic provinces, as well as through its online platform, alc.ca. Atlantic





Lottery's customer support network services the needs of players and retailers, supporting a positive and responsible gaming experience.

Atlantic Lottery's global supply chain consists of product suppliers, most notably providing such items as retail and video lottery terminals, instant win tickets, and digital gaming systems, and suppliers of non-product goods and services.

Atlantic Lottery operates under the framework of the Canadian Free Trade Agreement (CFTA) and the Comprehensive Economic and Trade Agreement (CETA), ensuring non-discrimination and commercial considerations in its operations. However, Atlantic Lottery can exercise discretion to fulfill its purpose as a monopoly or government enterprise.

Jointly owned by the four Atlantic provincial governments, all profits generated by Atlantic Lottery stay within the region, helping to fund essential services like health care, education, and infrastructure. This commitment to the community is a cornerstone of Atlantic Lottery's mandate.

#### **4. Policies, Due Diligence Processes and Assessing Risk**

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The Board of Directors determines our strategic direction and corporate policies, guides business operations, and approves the annual business plan, operating and capital budgets. Assisted by the Audit Committee, the board also monitors Atlantic Lottery's internal controls and financial systems.


The Audit & Risk Committee assists the Board of Directors with Atlantic Lottery's compliance with legal, ethical, and regulatory requirements. The Internal Audit department will carry out audits and assessments related to the risk of forced labour and child labour in our supply chain.


The Social Responsibility & Sustainability Committee's purpose is to ensure the corporation's success through overseeing and driving social responsibility practices and policies, as well as ensuring sustainable practices within ALC. The Committee promotes the corporation's environmental stewardship, social responsibility and governance (ESG) framework and strategy, working with the other Board Committees as appropriate. It also works towards integrating sustainability considerations into the corporation's operations, decision-making processes, and community engagement initiatives.

#### **5. Remediation**

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We did not identify any instances or allegations of forced labour or child labour within our business or in our supply chains in the reporting period, and therefore did not need to implement measures to remediate such practices or the loss of income





resulting from eliminating such practices. While no reports or complaints of forced labour or child labour have been received at this time, should such circumstances arise, we are dedicated to upholding our commitment to combat these issues while working to remediate any resulting adverse impacts.

## **6. Training**

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In our commitment to combat forced labour and child labour, we recognize the importance of targeted and relevant training. Below outlines the key components of our training:

### **1. Training Modules**

- a.** Our Online Modern Slavery Catalogue includes two learning modules specifically addressing forced labour in supply chains.
- b.** Mandatory Participation: All members of the Supply Chain Management team are required to complete these modules.
- c.** Each module incorporates a ‘check your understanding’ component, featuring embedded testing at each step to ensure comprehension.
- d.** Targeted Audiences: The modules are extended to other relevant stakeholders as deemed necessary and tracked through the performance management platform.

### **2. Maintenance**

- a.** We will actively collaborate with our Human Resources, Social Responsibility and Learning teams to keep the catalogue current.
- b.** Scheduled reviews to ensure the content remains relevant. Our current catalogue for FY25 did not require any updates.

## **7. Assessing Effectiveness**


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As Atlantic Lottery continues to develop its program to prevent modern slavery risks, we are committed to implementing measures that assess the effectiveness of our activities. In response to an internal audit review during our last reporting period, we initiated efforts in FY25 to explore both internal and external tools that can automate and streamline processes related to risk screening and supplier mapping. These efforts will be ongoing in FY26, enhancing our ability to evaluate the effectiveness of our program.

## **8. Summary**

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Atlantic Lottery remains committed to preventing forced labour and child labour within our operations and our supply chain. We are committed to engaging with our



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employees, suppliers and stakeholders on these concerns and will continue to fortify our approach to preventing and mitigating the associated risks.

### **Approval and Attestation**

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 Audit & Risk Committee Chair, Shaun MacIsaac, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity Atlantic Lottery Corporation, listed above. 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.

“I/We” have the authority to bind Atlantic Lottery Corporation.

Signature:   
Full name: Shaun MacIsaac, CPA, CA  
Title: Audit & Risk Committee Chair, Board of Directors

Signature:   
Full name: Dallas McCready  
Title: President and Chief Executive Officer