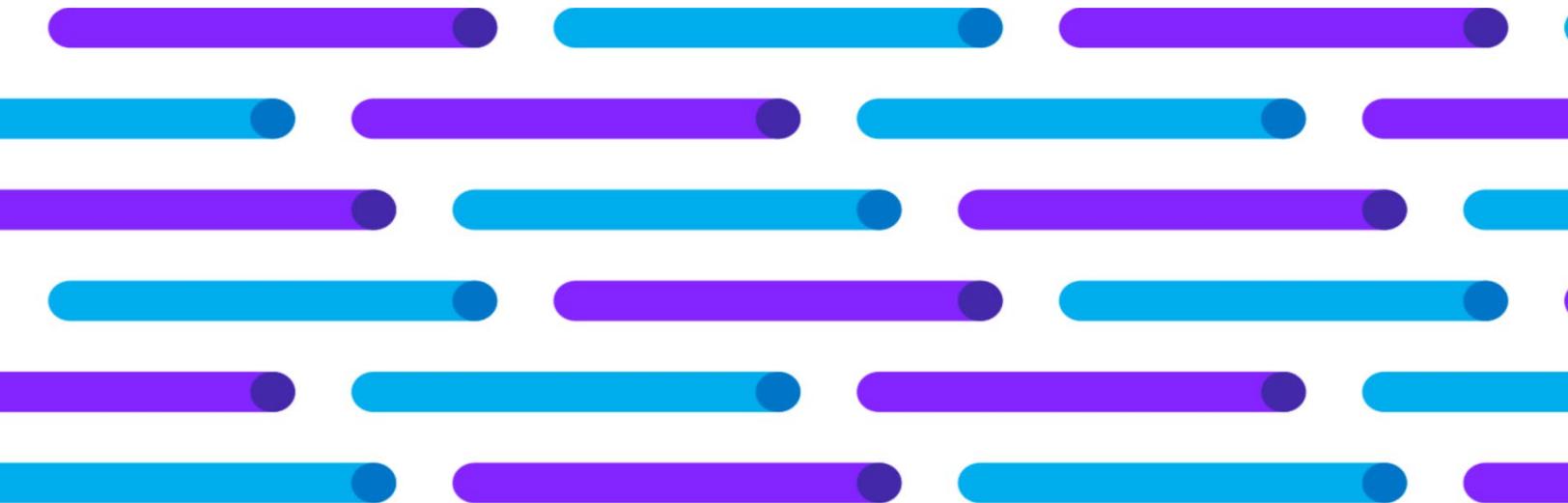




# ICBC Supply Chain Transparency Report

April 1, 2023 to March 31, 2024

*Canada's Fighting Against Forced Labour and Child Labour in Supply  
Chains Act*





## ICBC's Commitment to Fighting Against Forced Labour and Child Labour in Supply Chains

### Context

Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") came into force on January 1, 2024. The Act aims to combat forms of modern slavery by increasing industry awareness and transparency regarding child and forced labour risks in supply chains and driving businesses to improve their practices. As part of the new measures, the Act imposes an annual reporting requirement on many institutions and entities in Canada.

### About the Report

The Insurance Corporation of British Columbia or "ICBC" is a provincial Crown corporation that reports to the Government of British Columbia through the Minister of Public Safety and Solicitor General. While ICBC's activities involving producing, purchasing, or distributing goods in Canada or elsewhere, or importing goods produced outside of Canada, are minimal for the purposes of the Act, we are submitting this ICBC Supply Chain Transparency Report (the "Report") in support of Canada's international commitment to conquering modern slavery in supply chains. In filing the Report, ICBC endorses the Act's public interest objectives and acknowledges the need for greater transparency in supply chains as part of the fight against forced and child labour. Nonetheless, ICBC is not conceding that the Act applies to it, nor is ICBC conceding that the federal government has jurisdiction over ICBC or any other provincial agencies or corporations respecting any of the matters addressed by the Act. We note Public Safety Canada's position that some provincial Crown corporations may be subject to the Act's reporting requirements by falling under the definition of "entity" in the legislation. However, this position is untested and may be subject to challenge. Accordingly, this filing is without prejudice to any legal rights, defences, powers, rights, immunities, or exemptions that ICBC may have under any law. This filing does not set a precedent for the same or any similar kind of reporting in the future, and we reserve the right to decline to file future reports.

The Report covers the activities undertaken by ICBC during the financial year from April 1, 2023 to March 31, 2024, to identify and mitigate potential risks related to forced or child labour in our supply chains. The Report is prepared in accordance with Part 2 of the Act.



## Steps Taken to Prevent and Reduce the Risk of Forced Labour or Child Labour

Steps taken by ICBC over its last financial year to prevent and reduce the risk of forced labour or child labour in ICBC's supply chains include the following:

- ICBC has a robust procurement process with extensive supplier selection criteria for all potential ICBC business partners and/or suppliers that includes supplier vetting and risk assessments to identify any ethical and other concerns.
- ICBC takes great care to select and work with suppliers that are aligned with our corporate values and comply with ICBC's Code of Ethics.
- Strategic Supply Management is a dedicated department within ICBC that is accountable for the processes relating to the acquisition of goods and services. Team members are responsible for identifying, monitoring, and evaluating risks throughout the procurement process.
- ICBC has policies in place to effectively manage all supplier related processes and relationships, including potential risks.
- ICBC also has well-established Enterprise Risk Management strategies and processes to ensure consistent standards and execution of risk management activities and governance processes across the organization.

We are committed to continuously monitoring our procurement activities and regularly reviewing our policies and processes to ensure that our practices are socially responsible and promote ethical business practices.

## Company Structure, Activities, and Supply Chains

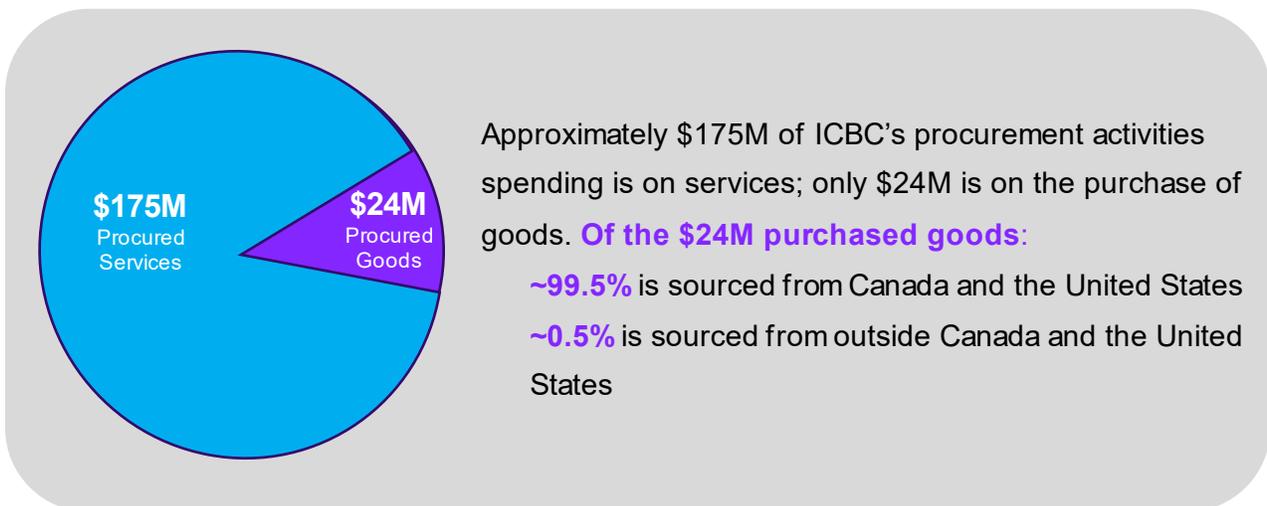
### **Our structure and activities**

ICBC is a provincial Crown corporation mandated by the *Insurance Corporation Act*, *Insurance (Vehicle) Act* and *Motor Vehicle Act* to provide universal compulsory auto insurance (Basic insurance) to drivers in British Columbia, with Basic insurance rates regulated by the British Columbia Utilities Commission. ICBC also provides Optional auto insurance products and other non-insurance services such as vehicle registration and licensing, driver licensing, fines

collection and issuance of B.C. Services Cards. It is one of B.C.'s largest corporations, operating in the finance and insurance sector. As a financial services company, ICBC is not a significant acquirer of goods that are ordinarily the subject of trade and commerce.

ICBC does not have any active operating subsidiary companies. ICBC has a number of entities that are either wholly-owned subsidiaries of ICBC or associated entities or other indirect nominee companies in relation to ICBC. These entities hold or have held investment properties, infrastructure, mortgage, and private equity investments for the purpose of generating investment income. The Report only covers ICBC since these other entities do not engage in any activities that could give rise to a reporting obligation under the Act.

### Our supply chain



ICBC has reviewed the categories of goods purchased during our last financial year, which include purchases from third party distributors that supply ICBC with driver licensing and B.C. Service cards, license plates, IT equipment and accessories, and uniforms. Almost all goods are sourced from within Canada and the United States, and both countries have implemented measures aimed at tackling modern slavery in supply chains. The industry in which ICBC operates, coupled with the types of services delivered by ICBC, also presents less risk of exploitation than other business sectors. As such, ICBC considers the risk of exploitative labour practices within its direct supply chain to be relatively low.



There exists some risk of forced labour and child labour associated with purchases from third party distributors, potentially for any goods originating in other jurisdictions without any legal or regulatory protections in place. ICBC will continue to monitor this risk.

## Policies and Due Diligence Processes

ICBC has the following policies and processes in place to help us identify and mitigate the risks of forced labour and child labour:

Policy/Procedure	Purpose
<b>Supplier Intake Process</b>	Supplier selection criteria for all potential ICBC business partners and/or suppliers that includes supplier vetting and risk assessments to identify ethical and other concerns. ICBC is committed to acquiring goods and services in an open, ethical and transparent manner.
<b>Code of Ethics</b>	ICBC’s Code of Ethics provides guidance on how to live our corporate values every day. As part of being Collaborative, Supportive, Straightforward and Knowledgeable in all interactions, ICBC is dedicated to conducting its business according to the highest standards of honesty, ethics and integrity. Expected behaviours of all ICBC employees, Board members and contractors include acting with respect, demonstrating transparency and authenticity, and upholding the B.C. <i>Human Rights Code</i> . Compliance is required at all times with both the letter and the spirit of all federal and provincial legislation, municipal by-laws, and applicable corporate policies.
<b>Corporate Acquisition Policy</b>	ICBC’s Corporate Acquisition Policy aims to ensure that ICBC effectively manages all supplier-related processes and relationships. Potential risks (reputational as well as legal and financial) in supplier processes and relationships are considered and mitigated, as appropriate. Strategic Sourcing is responsible for identifying, monitoring, and evaluating risks throughout the procurement process.



<b>Standardized Form of Supplier Agreements</b>	Contract templates require suppliers and other business partners to adhere to ICBC’s Code of Ethics.
<b>Supplier Complaint Review Process</b>	Informal and formal governance procedures for addressing supplier related issues.
<b>Enterprise Risk Management Policy and Framework</b>	ICBC’s Enterprise Risk Management Policy imposes standards to ensure the consistent implementation of enterprise risk management strategies and processes across ICBC. The related Enterprise Risk Management Framework supports the management of both financial and non-financial risks for ICBC. It details ICBC’s risk management activities which include how risk is assessed; the roles and responsibilities of senior leaders and all employees in assessing and managing risk; and the effective governance, tools, reporting and communication of risk information throughout the organization.

## Assessed Risk and Remediation of Forced Labour or Child Labour

ICBC has not identified any instances of forced labour or child labour in our activities and supply chains, and as such, has not been required to take any remedial actions.

## Ongoing Efforts to Fight Against Forced Labour and Child Labour

### Training provided to employees

Strategic Supply Management team members have been educated on the Act. Training in this area will be an ongoing process and expanded to deliver a comprehensive understanding of the considerations for recognizing, responding to, and reporting instances of forced labour and child labour in our procurement and supplier onboarding processes.

### Monitoring the effectiveness of our efforts

ICBC plans to continually review and refine our methods for identifying and mitigating the risks of forced labour and child labour in our supply chains. These methods include, but are not limited to:



- Refining our supplier code of conduct that clearly communicates supplier expectations to be socially responsible and to adopt ethical business practices against forced labour and child labour.
- Strengthening supplier engagements and due diligence procedures through supplier training, workshops and compliance reviews to ensure that ICBC's standards around the Act are met.
- Enhancing technology to more effectively monitor and report risks of forced labour and child labour in our supply chains.

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## Approval and Attestation

The Report was approved pursuant to paragraph 11(4)(a) of the Act by ICBC's Board of Directors on May 29, 2024.

In my capacity as the Chair of the Board of Directors of ICBC, and not in my personal capacity, I make this attestation for and on behalf of ICBC in accordance with the requirements of the Act.

*In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that ICBC's Board of Directors has reviewed and approved the information contained in the Report for the entity or entities 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 above.*

Catherine Holt  
Chair of the Board of Directors, ICBC  
May 29, 2024

I have the authority to bind the Insurance Corporation of British Columbia (ICBC).