



**Atlantic
Lottery** | **Loto
Atlantique**

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

2025-26



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1. Introduction

This report is produced by Atlantic Lottery Corporation (“Atlantic Lottery”) for the Financial Year Ending March 31, 2026.

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


2. Addressing Forced Labour and Child Labour

Atlantic Lottery remains 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 recognizes that while its overall inherent risk remains low based on the nature of its operations and supplier base, evolving global conditions—including geopolitical conflict, trade disruptions, tariffs, and broader economic uncertainty—necessitate continued vigilance. Accordingly, ALC acknowledges the need to further understand and, where appropriate, assess risks across all tiers of its supply chain, from the sourcing of raw materials to the point of purchase, consistent with the intent of the Act.

ALC will continue to collaborate with internal and external subject-matter experts to ensure that the depth of due diligence undertaken is proportionate to identified inherent risks

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 our activities were limited. While the prior reporting year represented a period of significant establishment and change, updates related to forced labour and child labour expectations were communicated as appropriate and throughout the year by relevant internal functions.

b. Internal Awareness: Atlantic Lottery continues to promote awareness of the Fighting Against Forced Labour and Child Labour in Supply Chains Act and its implications for supply chain practices. During the reporting period, updates were shared with relevant internal stakeholders as part of annual reporting communications, including key learnings arising from the annual report to Parliament, industry webinars, and guidance from external subject-matter experts. These communications were intended to reinforce understanding of legislative expectations and emerging external considerations. As there were no material changes to requirements or identified impacts to Atlantic Lottery's operations or supply chain activities during this period, no additional internal process changes were required.

c. Training Modules: All new employees within the Supply Chain Management (SCM) team completed mandatory forced labour and child labour training as part of their onboarding. ALC continues to work with its Human Resources and Social Responsibility learning partners to expand its catalogue of learning modules as new content becomes available. Targeted training opportunities continue to be offered to other departments, including members of the Risk and Assurance team. All training modules remain available to all employees.

d. Supply Chain Documentation: As part of ALC's annual obligations, all strategic and critical vendors are required to report any known instances of forced labour or child labour within their supply chains. No such incidents were reported during this reporting period.

e. Ethics Hotline Services: Atlantic Lottery maintains an independent, confidential, and anonymous Ethics Hotline for the reporting of suspected unethical or illegal conduct. This mechanism remains an important element of ALC's control environment. No reports related to forced labour or child labour were received during the reporting period.

f. Supplier Code of Conduct: Following its introduction in the previous reporting year, ALC's Supplier Code of Conduct is now fully embedded as a mandatory requirement within all publicly bid procurement processes. All contracted vendors must agree to the Code of Conduct as a condition of doing business with ALC.



g. Vendor Mapping:

No incidents of forced labour or child labour were identified during the reporting period. While ALC explored the use of third-party tools to further enhance vendor mapping and supply chain visibility, the variability in program costs led to a decision to pause external implementation.

Based on an assessment of ALC's top imported risk areas and its overall low inherent risk profile, the organization adopted a risk-tolerant and proportionate approach, managing vendor mapping activities internally.

3. Structure, Activities and Supply Chains

Atlantic Lottery is a publicly owned corporation, headquartered in Moncton, New Brunswick. It provides government-regulated 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, as well as sports betting and online gaming.


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 healthy play 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 provinces, all profits generated by Atlantic Lottery are returned to the governments for use 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

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

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

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. ALC continues to collaborate with our Human Resources, Social Responsibility and Learning teams to ensure training materials remain relevant and aligned with emerging risks. The current training catalogue remains appropriate for the reporting period.

7. Assessing Effectiveness

ALC will continue to seek opportunities aligned with its Third-Party Risk Management framework to further automate and enhance the tracking and assessment of forced labour and child labour risks. These efforts are planned for continued exploration into FY27.


8. Summary


Atlantic Lottery remains committed to preventing forced labour and child labour within our operations and our supply chain. ALC will continue to monitor evolving risks, engage with our suppliers, employees and stakeholders and apply proportionate and effective measures consistent with its values and regulatory obligations.

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 Incorporation, 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: Dattas McCreedy
Title: President and Chief Executive Officer