



# **SaskTel Modern Slavery Report**

**2025-2026**

**Fighting Against  
Forced Labour and Child Labour in  
Supply Chains Act (Canada)**

## Introduction

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This Report constitutes Saskatchewan Telecommunications' Report Regarding Modern Slavery (Report), covering our fiscal year April 1, 2025 to March 31, 2026 (the "Reporting Period"). This report is made on behalf of Saskatchewan Telecommunications and its affiliates (collectively "SaskTel", "we", "us" or "our") pursuant to section 6(2) of the Fighting Forced Labour and Child Labour in Supply Chains Act (the Act).

The Report outlines SaskTel's approach and efforts to detect, mitigate and prevent the risk of modern slavery in our supply chain. SaskTel is filing this report because we support the Act's goals of preventing and reducing the risk of forced or child labour in supply chains. By filing this report, SaskTel is not conceding that the Act applies to it, nor is SaskTel conceding that the federal government has jurisdiction over SaskTel or any provincial agencies or corporations respecting any of the matters addressed by the Act. This filing is without prejudice to any legal rights, defences, powers, rights, immunities or exemptions that SaskTel may have under any law. This filing does not set a precedent for this or any other similar matter in the future, and we reserve the right to decline to file future reports.

## Identifying Information

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- Reporting entity's legal name: Saskatchewan Telecommunications ("SaskTel")
- Financial reporting year: 2025-2026 (April 1, 2025 – March 31, 2026)
- Identification of a revised report (if this is a revised version of a report already submitted this reporting year): N/A
- Business number(s), if applicable: Sask. Corporate Registry Entity Number 101020055
- Identification of a joint report: N/A
- Identification of reporting obligations in other jurisdictions: N/A
- Entity categorization according to the Act: Entity
- Sector/industry: Information and Communications Technology
- Location: SaskTel is based in Regina, Saskatchewan with operations throughout the province

## Our Organization

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Saskatchewan Telecommunications is a provincial crown-owned telecommunications firm based in the province of Saskatchewan, Canada. SaskTel was established pursuant to the Telephone Acts as the Department of Railways, Telegraphs and Telephones on June 12, 1908. Owned by the provincial government, SaskTel and its affiliates have a workforce of approximately 3,300 full-time equivalent employees (FTEs). SaskTel offers a wide range of ICT products and services (including wireline and wireless communications services), broadband internet (including copper DSL, fibre to the home, and wireless broadband), wireless data services, Internet Protocol Television services, data centre services, cloud-based services, advertising services, and security monitoring services. SaskTel International (SI) is a fully owned affiliate of SaskTel. Established in 1986, SI is a software development and professional services company providing international software and consulting services to communication service providers (CSPs) globally.

## Corporate Structure

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SaskTel is a Crown corporation governed by The Saskatchewan Telecommunications Act of the province of Saskatchewan. SaskTel is also subject to the provisions of The Crown Corporations Act, 1993 of Saskatchewan. The Crown Investments Corporation of Saskatchewan (CIC), as the holding company for Saskatchewan's commercial Crown corporations, has authority to establish direction for SaskTel related to certain matters set out in legislation. Through the Chair, who is an independent director, the Board of Directors is accountable to the Minister Responsible for SaskTel. The Minister Responsible is a key communications link among the Corporation, CIC, Cabinet, the Legislature and the public.

The Lieutenant Governor in Council appoints members of SaskTel's Board and designates the Chair and Vice Chair. Subject to applicable legislation, directors are appointed for a fixed term, and their appointments can be renewed at expiry. There are twelve (12) members on the Board. The Board of Directors is responsible for supervising the management and affairs of the Corporation. While focusing on the strategic leadership of the Corporation, the Board delegates day-to-day operations to management and holds them accountable for the Corporation's performance.

## Our Supply Chain

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SaskTel's Procurement department acts as the sole purchasing agent for all goods and services for SaskTel and SaskTel International. Procurement's mandate is to enable SaskTel to achieve business objectives by providing best practice supply chain and asset management services. Our supplier network is critical to implement and support communication networks across the province of Saskatchewan and enable SaskTel to achieve its vision statement of enriching everyday life by empowering people, organizations, and communities to reach their full potential.

SaskTel's suppliers are located primarily in Canada and the United States, with some specialized software and network equipment sourced from suppliers in Europe. The amount paid to suppliers in 2025-26 totalled \$1.21B, primarily focused on the following areas:

- Marketing & Sales
- Network & Hardware
- IS & Technology  
(Software Licenses & Maintenance)
- Business & Consumer Products
- Customer & Construction Services
- Intra-Carrier Services Professional Services & Contingent Labour
- Facilities & Land
- General Telecommunication Services
- Logistics, Warehouse & Transportation
- Human Resources & Corporate Services
- Tools & Consumables

## **Policies and Due Diligence Processes**

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SaskTel's foundational values are:

- Honesty - build honest relationships through open communication with all people interacting with our business.
- Integrity - deliver excellence by acting with integrity when conducting business and by taking pride in and responsibility for our work and decisions.
- Respect - embrace diversity and promote a safe, respectful, and healthy environment.

SaskTel is committed to working with suppliers who demonstrate these values through the following methods:

- SaskTel's Request for Proposal (RFP) and Contract templates include specific clauses pertaining to Supplier Conduct Standards. When suppliers respond to an RFP administered by SaskTel, they must agree to an "RFP Policies & Terms" reference document included in each market event. Each party that responds to an RFP agrees that the document is binding. Suppliers are required to agree to the following terms:
  - Supplier Conduct Standards - Supplier will in competing and submitting its proposal for the Deliverables in this procurement event avoid unethical or compromising actions and behaviour or the appearance of unethical or compromising actions and behaviour;
  - Disqualification for Prohibited Conduct - SaskTel may disqualify a Supplier, rescind an invitation to negotiate, terminate a contract subsequently entered into, or take such other action it may deem appropriate if SaskTel, in its sole and absolute discretion, determines that the Supplier has engaged in any conduct prohibited by this RFP.
  - Illegal or Unethical Conduct - Suppliers are not to engage in any illegal business practices, including activities such as bid-rigging, price-fixing, bribery, fraud, coercion or collusion. Suppliers are not to engage in any unethical conduct, including lobbying, as described above, or other inappropriate communications; offering gifts to any employees, officers, agents, elected or appointed officials or other representatives of SaskTel; deceitfulness; submitting proposals containing misrepresentations or other misleading or inaccurate information; or any other conduct that compromises or may be seen to compromise the competitive process provided for in this RFP.
  - Past Performance or Past Conduct - SaskTel may prohibit a Supplier from participating in this or future procurement processes based on past performance or based on inappropriate conduct in a prior procurement process, including but not limited to the following:
    - Illegal or unethical conduct as described above;
    - The refusal of the Supplier to honour its submitted pricing or other commitments; or

- Any conduct, situation or circumstance determined by SaskTel, in its sole and absolute discretion, to have constituted an undisclosed conflict of interest.
- SaskTel follows a best value approach to the purchase of goods and services. Supplier selection is based upon multiple rated criteria that reflect the individual needs and priorities of SaskTel, including references, experience, performance history, demonstrated ability to successfully perform the contract, risk/compliance management practices, alignment with public policy directives, among others.
- If at any point SaskTel becomes aware that a supplier is not meeting any of the conditions listed above, it may pursue disciplinary/legal action up to and including termination of the contract. SaskTel may also prohibit a supplier from participating in future SaskTel market events.

## **Steps Taken to Prevent and Reduce Risk**

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SaskTel is committed to the highest possible standards of integrity and accountability in our supplier relationships. Last year we developed a Supplier Code of Conduct (Code) which is incorporated into all new supplier contracts. This Code outlines SaskTel's expectations for our suppliers as they relate to acceptable behaviours, standards, labour practices, and compliance monitoring, among others. We also revised the "RFP Policies & Terms" document used within our market events (referenced earlier in this report) to state that Suppliers are bound by SaskTel's Supplier Code of Conduct in all dealings and interactions with SaskTel.

SaskTel's current procurement platform is nearing end-of-life, and we are in the preliminary stages of exploring new sourcing tool options. This presents a strategic opportunity to reassess our procurement capabilities and pursue a modernized solution that not only meets SaskTel's current operational requirements but also positions the organization to achieve long-term business objectives, drive efficiency, and support future growth. The RFP evaluation criteria will give consideration to whether the proposed solution has supply chain mapping and/or risk identifying capabilities that would help us to proactively identify and avoid working with suppliers who may use unethical business or employment practices.

If an employee suspects wrongdoing either internally or with an external vendor, they can file a report using the processes described in The Public Interest Disclosure Act, or through the anonymous reporting process provided by a third-party vendor to SaskTel. SaskTel employees who believe that they are being asked to commit a wrongdoing or believe that a wrongdoing has been committed by someone else, should report the incident to SaskTel's third-party vendor. Reports of wrongdoing will be routed to senior company managers who will:

- Receive, record and review disclosures of information concerning wrongdoing and establish if there are sufficient grounds for further action or whether the matter is more appropriately referred to another body;
- Ensure that procedures are in place to manage instances of wrongdoing that require immediate or urgent action;

- Initiate investigations when required, ensuring the rights of all parties are respected, including the employee(s) making the disclosures, witnesses, and those implicated or alleged to be responsible for wrongdoing, and;
- Upon completion of the investigation, make recommendations and/or initiate appropriate actions to address the wrongdoing.

Through SaskTel's supplier performance management program, business units are responsible for the day-to-day management of their suppliers and are key to holding suppliers accountable to what was agreed to in the contract. Issues are addressed and resolved directly with the supplier as they arise. If issues persist or the severity of the issue is extreme, Procurement and/or SaskTel Corporate Counsel provide guidance and support to appropriately address the issue.

SaskTel regularly completes an assessment to segment SaskTel suppliers based on financial, risk and strategic impacts. A supplementary process is used to ensure identified suppliers receive formal evaluation and feedback on their overall performance with SaskTel. This performance data is used as a consideration in future procurement opportunities. For each of the identified suppliers, a survey is completed by the end users throughout SaskTel who interact with the supplier. Results of the survey are summarized and sent out to all survey participants to improve their understanding of how suppliers are performing across all business units. In addition, a Procurement prime leads a performance discussion with the supplier to share the survey results, gather feedback and, if necessary, work with vendors and end users to improve supplier performance and address gaps.

Any supplier who was involved in a competitive procurement event may request a debriefing session within thirty (30) days of notification of the event's outcome. The intent of a debriefing session is to allow for two-way dialogue between suppliers and SaskTel. These sessions aid the supplier in presenting a better submission in response to subsequent SaskTel procurement opportunities and allow the supplier the opportunity to provide feedback on SaskTel's RFP process. SaskTel keeps an internal record of what was discussed during a debrief session and will action feedback accordingly.

## Risk Areas

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SaskTel is not aware of any instances of forced or child labour within its direct supply chain at the time this report was prepared. We will continue to thoroughly vet any supplier engaged to provide goods or services to SaskTel and quickly action any reports or concerns as soon as we become aware of them.

## Remediation Measures Taken

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If SaskTel becomes aware of any confirmed or potential instances of forced or child labour in its supply chain, the company will investigate and take the appropriate remedial measures by either ceasing, preventing or mitigating any adverse impacts. We did not identify any instances of forced or child labour in our supply chain during the Reporting Period and, therefore, no remedial measures were taken, including those related to remediating the economic impact on the most vulnerable families.

## Training and Awareness

Understanding and complying with SaskTel’s Code of Business Conduct is a condition of employment at SaskTel. Employees complete mandatory training when they are hired and make an annual declaration that they are aware of their responsibilities related to SaskTel’s Code of Business Conduct during their performance evaluation.

SaskTel Procurement Officers attend regular training webinars to stay informed of any updates or changes relevant to Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act. SaskTel offers a “Fighting Against Forced & Child Labour in Supply Chains Act” virtual training curricula to all internal employees. The course is required for anyone working in the SaskTel Procurement department, but all employees are encouraged to complete the training to familiarize themselves with the Act and SaskTel’s responsibilities as a reporting entity.

SaskTel also offers a course to internal employees called “Procurement Basics” which is designed to educate other business units on the policies and processes of the Procurement department should they be required to work with suppliers in their roles. This course has been updated to include a section on the purpose of and reporting obligations under the Act.

## Assessment

SaskTel acknowledges that increasing transparency and awareness about the prevalence of forced and child labour in supply chains is a collaborative effort that requires input from all stakeholders. SaskTel remains committed to continuously evaluating and improving our practices by attending supplier/industry forums and networking events, discussing and sharing procurement best practices with other Crowns, and monitoring the industry for new developments.

## Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed 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 fiscal year ending March 31, 2026.

Full name: Charlene Gavel

Title: President & CEO

Date: April 20, 2026

Signature – I have the authority to bind SaskTel:



Full name: Grant Kook

Title: Chair, Board of Directors

Date: April 21, 2026

Signature – I have the authority to bind SaskTel:

