

# Interrogatories of Intervenor Keith Pinto

## Context and Chronology

The following summary is provided for contextual purposes only, to assist in understanding the Intervenor’s familiarity with OPG’s organizational structure, systems, and governance environment. It is not intended to plead or argue any individual employment matter.

The Intervenor served 16 years with Ontario Power Generation Inc. (“OPG”) Corporate Real Estate and Facilities until early 2019, most recently as Director, Facilities & Projects. In that role, the Intervenor held enterprise accountability for corporate real estate, facilities management, and project delivery functions and reported to senior leadership within OPG’s Corporate Real Estate organization, including the Vice President, Corporate Real Estate.

In 2019, the Intervenor supported the commercial launch of Laurentis Energy Partners (“Laurentis”) during its formative phase. During this transitional period, the Intervenor operated under a dual reporting structure reflecting Laurentis’ initial integration with OPG systems, resources, and oversight functions. By late 2019, the Intervenor reported directly within Laurentis leadership and was responsible for establishing foundational corporate services required for the launch of a new operating entity.

In 2020, the Intervenor joined Laurentis as its first employee, assuming enterprise-wide accountability for multiple corporate functions, including Finance, HR and LR, Information Technology, Real Estate, EH&S, Supply Chain, Communications, Fleet Services, and Quality. In this capacity, the Intervenor was responsible for organizational design, systems implementation, governance structures, and cross-functional integration as Laurentis scaled its operations.

Across these roles, the Intervenor developed direct, first-hand familiarity with OPG and Laurentis systems, internal controls, governance frameworks, and the interaction between corporate, subsidiary, and regulated business functions. This experience informs the scope, framing, and focus of the interrogatories submitted in this proceeding.

# INTERROGATORY IR-1

## INTERNAL CONTROLS AND MAINTENANCE INFORMATION

Corporate Real Estate (CRE) Asset and Work Management Systems

### **Context: Order of Magnitude**

OPG's Corporate Real Estate (CRE) function manages a large and complex portfolio of properties and facilities, including assets located on or directly supporting nuclear generating sites. Based on OPG's formal reporting, this portfolio comprises hundreds of buildings and supporting structures distributed across thousands of hectares and entails >\$100 million annually in combined capital and operating expenditures. In recognized facilities management practice, corporate real estate and facilities costs are commonly among the largest categories of enterprise expenditure, often second only to labour. While the relative proportion may differ in a regulated utility environment, the scale of CRE investment and its role in supporting safe, reliable, and continuous operations make the effectiveness of CRE maintenance systems, internal controls, and oversight a matter of material importance.

### **Purpose and Scope**

This interrogatory is narrowly tailored to establish the existence, content, and reliability of system-level information used by Ontario Power Generation Inc. ("OPG") to manage, monitor, and report on Corporate Real Estate ("CRE") maintenance activities, including maintenance backlog and exceptions, during the period January 1, 2020 to December 31, 2025.

The information requested is required to assess OPG's evidence under the approved Issues List, including Issues 11–16 (Operations, Maintenance and Asset Management) and Issue 37 (Internal Controls and Oversight).

This interrogatory is structured to establish the factual maintenance and backlog information generated by OPG's internal systems and to confirm whether those systems were subject to appropriate post-implementation validation, effectiveness review, and ongoing control.

The Intervenor is prepared to execute the OEB Declaration and Undertaking with respect to any confidential information.

## Definitions

**“CRE System”** means Archibus, Passport/AssetSuite, and/or any successor, parallel, or integrated system used to manage CRE maintenance, work orders, asset condition, backlog, or exception reporting.

**“Maintenance Backlog”** means deferred, overdue, or uncompleted corrective, preventive, or regulatory maintenance work orders.

**“Exception”** means any system-generated or management-defined indicator identifying overdue work, non-compliance, or elevated risk.

**“Safety-critical assets”** means CRE assets whose failure could reasonably result in safety, regulatory, environmental, or significant operational risk.

**“Nuclear-critical assets”** means CRE assets, including storage facilities, warehouses, or supporting infrastructure, whose failure or loss could reasonably impair the availability of materials, equipment, or services essential to continued nuclear operations.

### A. System Outputs and Maintenance Backlog

For the period 2020–2025, produce standard or routinely available CRE System reports or exports showing:

- Total maintenance backlog by year;
- Backlog by asset category and by facility;
- Identification of safety-critical and nuclear-critical assets within the backlog;
- Aging of backlog items.

If backlog data were not consistently captured or reported for any portion of this period, state:

- The years or facilities affected; and
- What alternative tracking methods, if any, were used.

### B. Exception and Risk Visibility

Produce all exception reports, dashboards, or summaries generated by or derived from the CRE System during the same period that identified:

- Overdue or deferred maintenance; and
- Safety-critical, nuclear-critical, or regulatory-related exceptions.

- Identify whether such exception information was:
- Automatically generated by the system; or
- Manually compiled, supplemented, or overridden.

### **C. System Configuration, Data Integrity, and Effectiveness Review**

Produce documentation sufficient to show:

- The approved CRE System configuration used to support maintenance, backlog, and exception reporting; and
- Any material configuration changes between 2020 and 2025 that affected backlog tracking, exception identification, or reporting.
- Identify the role(s) or function(s) responsible for:
- CRE System data integrity; and
- Accuracy and completeness of CRE maintenance reporting.

With respect to the CRE System as a capital project:

- Produce any Post-Implementation Review (PIR), benefits-realization review, or equivalent assessment prepared to evaluate system effectiveness following implementation; or
- If no such review was completed, state this explicitly.
- If a PIR or equivalent review was completed, produce records identifying:

Any material findings, recommendations, or identified gaps; and Corrective actions or follow-up measures taken in response.

### **Privilege and Non-Existence**

If any responsive record is withheld on the basis of privilege, produce a privilege log identifying the document, date, author, recipient, and basis of the claim, together with a non-confidential description of its subject matter.

If any requested information does not exist, state this explicitly.

## **INTERROGATORY IR-2**

### **OVERSIGHT, RISK MANAGEMENT, ACCOUNTABILITY AND STRATEGIC PRACTICES**

CRE Maintenance Backlog, Condition Assessments, Risk Treatment, Corrective Actions, and Strategic Planning

#### **Purpose and Scope**

This interrogatory builds on IR-1 and seeks information necessary to assess how CRE maintenance information, backlog, and exceptions were evaluated, escalated, and acted upon; the adequacy of OPG's risk management, governance, and internal controls; and the degree to which OPG implemented recognized facilities and maintenance best practices and its own stated Facilities & Projects (F&P) strategic objectives during the period January 1, 2022 to December 31, 2025.

This interrogatory relates to Issues 11–16, 23–26, 37, and 38–40 of the approved Issues List.

Unless otherwise indicated, terms have the same meaning as in IR-1.

#### **A. Condition Assessments and Investigations**

For safety-critical or nuclear-critical CRE assets with deferred or overdue maintenance during 2022–2025, produce:

- Routine condition assessments, inspection reports, or investigative findings; and
- Records of recommended or completed follow-up actions.
- Produce any annual Building Condition Assessment reports, trend analyses, or comparable facility condition studies prepared by or for the Facilities & Projects organization during 2022–2025.
- Identify instances where no formal condition assessment (including annual condition assessments) was conducted despite known backlog, deferrals, or exceptions.

## **B. Risk Assessment and Acceptance**

Produce any risk registers, risk summaries, or impact analyses in effect during 2022–2025 that incorporated CRE maintenance backlog, deferred work, or CRE-related exceptions.

For material CRE maintenance deferrals, produce records showing:

- The assessed risk (qualitative or quantitative); and
- Whether the risk was mitigated, deferred, or accepted.
- Where risks were formally or informally accepted, identify:
  - The approving authority; and
  - The duration or period of acceptance.

## **C. Oversight and Decision-Making**

Produce records evidencing management-level or executive-level review of CRE maintenance backlog or risk during 2022–2025, including:

- Briefing materials;
- Decision notes; and
- Direction provided to management.
- Identify instances where CRE maintenance deferrals were linked to:
  - Capital planning assumptions; or
  - Anticipated facility replacement, refurbishment, or redevelopment.

## **D. Corrective Actions and Organizational Controls**

Produce records of corrective actions taken during 2022–2025 in response to:

- Identified deficiencies in CRE maintenance systems, tools, or processes; and
- Repeated maintenance exceptions or sustained backlog growth.
- Produce any internal audits, reviews, or assessments conducted during 2022–2025 that evaluated:
  - Effectiveness of CRE maintenance delivery; and
  - Adequacy of systems, internal controls, or governance arrangements.

### **E. Specific Work Orders and Prior Raised Concerns**

With respect to work orders previously raised regarding CRE maintenance concerns that remained open, were revisited, or were otherwise active during 2022–2025 (including those identified in FOI files 26-001 and 26-002), identify:

- The current status of each work order;
- The last substantive action taken;
- The responsible role or function; and
- Any associated invoices, purchase orders, or contracts.
- Produce internal correspondence or records from 2022–2025 that document:
  - Concerns raised regarding these work orders; and
  - Decisions to defer, modify, or close them without completion.

### **F. Strategic Planning and Best-Practices Implementation**

Produce any Strategic Facilities Plan, Facilities & Projects strategy, Facilities Master Plan, or comparable document that was in effect, updated, relied upon, or referenced by OPG during 2022–2025.

For each such plan or strategy, produce records showing how it was implemented during this period, including:

- Trend analyses or environmental scans used to inform decision-making;
- Alignment with OPG’s mission, strategic imperatives, and values;
- Short- and long-range facility plans;
- Project plans tied to stated objectives;
- Evaluation mechanisms, metrics, or follow-up reports;
- Benchmarking studies and actions taken in response;
- Business continuity, facilities reliability, preventive maintenance, or risk-management initiatives referenced in the plan;
- Staffing, resourcing, or organizational design changes implemented or maintained to support the plan; and
- Stated goals or targets and progress against them.

Identify any instances during 2022–2025 where OPG’s actual CRE or Facilities & Projects practices materially diverged from its stated strategic objectives or best-practice commitments.

### **G. Insurance and Third-Party Risk Oversight**

Produce records sufficient to demonstrate compliance during 2022–2025 with applicable insurance policy requirements and third-party risk-control obligations relevant to CRE properties, including records of inspections, risk surveys, recommendations, and follow-up actions by insurers or insurer-appointed risk engineers.

### **H. Cross-Jurisdictional Coordination and Resource Competition**

Describe the governance, monitoring, and escalation mechanisms used by OPG to manage jurisdictional overlap and resource competition between the central CRE organization and Nuclear Operations & Maintenance, including:

- How prioritization decisions affecting CRE assets on nuclear sites are made and reviewed;
- How work protection, lockout-tagout, or similar requirements affecting CRE maintenance are coordinated and monitored;
- How known organizational or process weaknesses identified in strategic planning exercises (including the Strategic Plan) were tracked and addressed; and

Any corrective actions or control enhancements implemented to mitigate operational, safety, or continuity risks arising from such cross-jurisdictional challenges.

### **Privilege and Non-Existence**

If any responsive document is withheld on the basis of privilege, produce a privilege log and non-confidential description as set out in IR-1.

If any requested record does not exist, state this explicitly.

## **INTERROGATORY IR-3**

### **GOVERNANCE, INDEPENDENCE, AND CONFLICT-MANAGEMENT CONTROLS**

Affiliated-Entity Oversight, Cross-Appointments, and Coordinated Practices

#### **Context**

During the period under review, Ontario Power Generation Inc. (“OPG”) conducted material activities through multiple affiliated entities, including subsidiaries and related entities operating in different jurisdictions and under varying regulatory and commercial frameworks. Such structures are commonly associated with heightened governance, independence, and conflict-management risks, particularly where leadership roles, decision-making authority, or operational practices overlap. This interrogatory seeks to understand how OPG identified, managed, and mitigated those risks at a design and control level.

#### **Purpose and Scope**

This interrogatory seeks information necessary to assess the adequacy of OPG’s governance framework, internal controls, and ethical safeguards in circumstances where OPG and its affiliated entities were represented as operating independently but may have been subject to shared leadership, coordinated practices, or cross-entity decision-making during the period January 1, 2020 to December 31, 2025.

The information requested relates to Issues 23–26 (Governance, Planning, and Cost Control), Issue 37 (Internal Controls and Oversight), and Issues 38–40 (Risk Management and Compliance) of the approved Issues List.

This interrogatory is directed at institutional design and control effectiveness, not at individual conduct.

The Intervenor will execute the OEB Declaration and Undertaking with respect to any confidential material.

## **Definitions**

**“Affiliated Entity”** means any subsidiary, joint venture, partnership, or related entity in which OPG held an ownership interest, governance role, or material influence.

**“Cross-Appointment”** means any instance where an individual simultaneously held executive, officer, or board-level roles across OPG and one or more Affiliated Entities.

**“Coordinated Forum”** means any recurring or ad-hoc meeting, committee, or working group involving representatives from OPG and one or more Affiliated Entities to discuss operational, strategic, human resources, contracting, or governance matters.

**“Conflict Mitigation Measures”** include disclosure requirements, recusals, independent approvals, secondary oversight, documentation requirements, or third-party review.

## **A. Representations of Independence and Governance Structure**

For the period 2020–2025, identify how OPG described the operational and governance independence of each Affiliated Entity in public, regulatory, or internal materials.

Produce records sufficient to show:

- The formal governance structure for each Affiliated Entity; and
- Reserved authorities, approval thresholds, or escalation requirements involving OPG.

## **B. Cross-Appointments and Overlapping Authority**

Identify all instances during 2020–2025 where individuals held concurrent executive or board-level roles across OPG and one or more Affiliated Entities.

For each instance, produce records sufficient to show:

- The roles held and duration of overlap;
- The scope of authority associated with each role; and
- Whether the roles involved influence over hiring, contracting, strategic partnerships, or capital or operating decisions.

### **C. Coordinated Forums and Information-Sharing Practices**

Identify any Coordinated Forums involving OPG and Affiliated Entities during the period, including their:

- Purpose and mandate;
- Participant roles (by function, not by name); and
- Frequency and duration.
- Produce any policies, terms of reference, or guidance governing:
- Permissible topics of discussion;
- Information-sharing boundaries; and
- Safeguards intended to preserve decision-making independence.
- Identify whether such forums addressed matters including:
- Human resources or labour relations strategy;
- Workforce planning or movement across entities;
- Contracting practices or vendor engagement; or
- Sequencing or coordination of strategic initiatives.

### **D. Conflict Identification and Mitigation**

Produce all policies, procedures, and Code of Business Conduct provisions in effect during 2020–2025 governing:

- Conflicts of interest;
- Cross-appointments; and
- Coordinated practices across Affiliated Entities.
- For each Cross-Appointment identified in Section B, identify:
- Whether a conflict assessment was conducted;
- What mitigation measures were applied; and
- The role or function responsible for oversight.

### **E. Escalation, Independence, and External Interface Controls**

Produce records evidencing how OPG ensured that:

- Actual or perceived conflicts were escalated outside affected reporting lines; and
- Independent review or challenge was available where ordinary governance channels may themselves have been conflicted.

Produce policies or records governing communications between OPG and external public-sector bodies concerning matters involving Affiliated Entities, including:

- Documentation and record-keeping requirements; and
- Oversight or approval mechanisms intended to preserve independence.

#### **F. Structural Conflicts of Interest and Delegated Authority Controls**

Produce policies, procedures, or guidance in effect during 2020–2025 addressing structural or inherent conflicts of interest, including circumstances where:

- A single leadership role encompassed responsibility for functions with potentially competing control objectives; or
- Segregation of duties ordinarily expected under governance best practices was not feasible.

For such circumstances, produce records sufficient to show:

- How the structural conflict was identified and assessed;
- What mitigation measures were required or recommended; and
- Whether the arrangement was treated as an acceptable risk, a transitional measure, or an approved exception.

Identify any instances during 2020–2025 where structural conflicts were acknowledged but permitted to continue, and the documented rationale for doing so.

#### **Privilege and Non-Existence**

If any responsive record is withheld on the basis of privilege, produce a privilege log identifying the document, date, author, recipient, and basis of the claim, together with a non-confidential description of its subject matter.

If any requested record does not exist, state this explicitly.

## **INTERROGATORY IR-4**

### **CODE OF BUSINESS CONDUCT CONTROLS AND SENIOR-LEVEL OVERSIGHT**

External Business Relationships and Hiring-Related Governance

#### **Purpose and Scope**

This interrogatory seeks information necessary to assess whether OPG maintained and applied appropriate Code of Business Conduct (“CoBC”) controls, conflict-management processes, and senior-level oversight mechanisms in connection with external business relationships involving other utilities and related hiring or engagement decisions, during a defined, event-specific period.

The interrogatory relates to Issue 37 (Internal Controls and Oversight) and Issues 38–40 (Risk Management, Compliance, and Ethical Conduct) of the approved Issues List.

The Intervenor will execute the OEB Declaration and Undertaking with respect to any confidential material.

#### **Definitions**

**“External Utility”** means any Canadian or provincial-scale electricity or energy utility operating outside Ontario and not part of OPG.

**“Trigger Period”** means the period beginning 30 days before and ending 6 months after any senior-level direction, request, or approval relating to the hiring, engagement, or placement of an individual associated with an External Utility.

**“CoBC Controls”** include disclosure requirements, conflict assessments, recusals, ethics reviews, approvals, or independent oversight required under OPG’s Code of Business Conduct or related policies.

**A. Code of Business Conduct Framework**

Produce the Code of Business Conduct and any related policies, procedures, or guidance in effect during the Trigger Period governing:

- Conflicts of interest;
- External business relationships; and
- Use of senior executive authority in hiring or engagement decisions.
- Identify the roles or functions responsible during the Trigger Period for:
  - Receiving conflict disclosures;
  - Conducting conflict assessments; and
  - Determining mitigation or recusal requirements.

**B. Application of CoBC Controls During the Trigger Period**

For the Trigger Period, identify whether any CoBC Controls were triggered in connection with:

- Business discussions or initiatives involving an External Utility; and
- Hiring, engagement, or placement decisions linked to such relationships.

For each instance, produce records sufficient to show:

- Whether a disclosure was made;
- Whether an assessment was conducted; and
- What mitigation measures, if any, were applied.

**C. Hiring and Engagement Governance**

Produce policies or guidance in effect during the Trigger Period governing:

- Creation of new positions or roles;
- Use of non-standard hiring pathways; and
- Approval requirements where no pre-approved position or headcount existed.

Identify whether any exceptions or non-standard practices were approved during the Trigger Period in connection with an External Utility relationship, and if so:

- The approving authority; and
- The documented rationale.

**D. Oversight, Ethics Review, and Escalation**

Identify whether any ethics review, screening, or determination was initiated or considered during the Trigger Period in relation to:

- External Utility relationships; or
- Related hiring or engagement decisions.

If so, produce records sufficient to show:

- The timing and scope of the review;
- Whether the review was internal or independent; and
- The outcome or disposition at a high level.

**E. Restrictions on Future Employment, Re-engagement, and Access to Work**

Produce policies or guidance in effect during the 2020-2025 Period governing restrictions on future employment, re-engagement, or access to work following investigations or terminations, including any appeal or review mechanisms applicable to such restrictions.

**Privilege and Non-Existence**

If any responsive record is withheld on the basis of privilege, produce a privilege log identifying the document, date, author, recipient, and basis of the claim, together with a non-confidential description of its subject matter.

If any requested record does not exist, state this explicitly.

## **INTERROGATORY IR-5**

### **SUBSIDIARY CONTRACTING GOVERNANCE, COST ATTRIBUTION, AND VALUE-FOR-MONEY**

#### **Purpose and Scope**

This interrogatory seeks information necessary to assess whether Ontario Power Generation Inc. (“OPG”) maintains adequate governance, internal controls, and value-for-money discipline over the engagement and use of independent contractors by its subsidiaries, including Laurentis Energy Partners as a representative subsidiary, particularly where senior executives exercise influence across entities or where contractor services benefit more than one entity, during the period January 1, 2020 to December 31, 2025.

This interrogatory relates to Issues 23–26 (Governance, Planning, and Cost Control) and Issue 37 (Internal Controls and Oversight) of the approved Issues List.

The Intervenor will execute the OEB Declaration and Undertaking with respect to any confidential material.

#### **Definitions**

“**Subsidiary**” means any entity controlled by OPG, including Laurentis Energy Partners.

“**Independent Contractor**” means any person or entity engaged through a professional services, staffing, or resourcing arrangement rather than as an employee.

“**Cross-Entity Oversight**” means circumstances where a senior executive exercises operational or financial oversight across OPG and one or more Subsidiaries.

#### **A. Subsidiary Contractor Governance Framework**

Produce policies, procedures, or guidance in effect during 2020–2025 governing:

- Engagement of Independent Contractors by Subsidiaries;
- Sole-source versus competitive selection;
- Approval of contractor rates, scope, and duration; and
- Required value-for-money or alternatives assessments.

Identify how OPG ensures that contractor engagements by Subsidiaries are independently justified and subject to appropriate oversight.

### **B. Executive Oversight and Conflict-Mitigation Controls**

Produce policies or guidance governing Cross-Entity Oversight, including controls intended to mitigate conflicts of interest where senior executives influence:

- Demand for services at OPG; and
- Engagement or deployment of contractors at a Subsidiary.

Identify what controls were required or applied during 2020–2025 to prevent preferential sourcing or deployment of Subsidiary-engaged contractors due to cross-entity executive influence.

### **C. Cross-Entity Use of Subsidiary Contractors**

Identify any instances during 2020–2025 where Independent Contractors engaged by a Subsidiary performed work that benefited:

- OPG; or
- Another Subsidiary.

For each instance, produce records sufficient to show:

- The nature of the work performed;
- Which entity engaged the contractor;
- Which entity benefited; and
- How the arrangement was approved.

### **D. Cost Attribution and Transparency**

Produce policies or guidance governing:

- Time recording for contractors performing work across entities; and
- Cost attribution and charge-back between OPG and Subsidiaries.
- For the instances identified in Section C, produce records sufficient to show whether contractor time and costs were fully attributed to the benefiting entity.

If no formal cost-tracking or attribution occurred, state this explicitly.

**E. Value-for-Money and Alternatives Assessment**

Identify whether value-for-money or alternatives assessments were undertaken before using Subsidiary-engaged contractors to support work benefiting OPG or another entity.

If no such assessments were undertaken, state this explicitly.

**Privilege and Non-Existence**

If any responsive record is withheld on the basis of privilege, produce a privilege log identifying the document, date, author, recipient, and basis of the claim, together with a non-confidential description of its subject matter.

If any requested record does not exist, state this explicitly.

## **INTERROGATORY IR-6**

### **HR AND LABOUR RELATIONS GOVERNANCE, TERMINATION PRACTICES, AND LEADERSHIP OVERSIGHT**

#### **Purpose and Scope**

This interrogatory seeks information necessary to assess whether OPG and its Subsidiaries maintain adequate human resources and labour-relations governance, including leadership selection, evaluation, and termination controls, consistent with public-sector accountability and transparency expectations, during the period January 1, 2020 to December 31, 2025.

This interrogatory relates to Issues 23–26 (Governance, Planning, and Cost Control) and Issue 37 (Internal Controls and Oversight) of the approved Issues List.

The Intervenor will execute the OEB Declaration and Undertaking with respect to any confidential material.

#### **Definitions**

**“Subsidiary”** means any entity controlled by OPG, including Laurentis Energy Partners.

**“Seconded”** means an OPG employee assigned to work at a Subsidiary.

**“Senior Role”** means Director, Vice-President, or equivalent.

**“Termination”** means separation from service, whether with or without cause, including the cessation of a contract.

#### **A. Leadership Selection and Competency Frameworks**

Produce policies, procedures, or guidance in effect during 2020–2025 governing:

- Selection, appointment, and evaluation of individuals into Senior Roles;
- Required competency, merit, or qualification frameworks; and
- Use of non-standard pathways (e.g., contractors, retirees, or secondees) for Senior Roles.

Identify any approved exceptions to standard selection or posting requirements during 2020–2025 and, for each:

- Describe the circumstances;
- Identify the approving authority; and
- Indicate how the exception was documented.

Identify Senior Role appointments during 2020–2025 where the incumbent had previously been a contractor, retiree, or secondee, and produce records sufficient to show:

- The criteria used to assess suitability;
- Any post-appointment evaluation conducted; and
- The circumstances of departure, if applicable.

## **B. Termination and Separation Governance**

Produce policies or guidance in effect during 2020–2025 governing terminations and separations, including:

- With-cause versus without-cause determinations;
- Required approvals and due-process steps; and
- Allocation of termination costs between OPG and Subsidiaries.

Produce, in anonymized form where appropriate:

- A summary of termination events for Senior Roles during 2020–2025, including reason codes and approval levels; and
- Any internal reviews or analyses addressing elevated termination or turnover rates at a Subsidiary.

## **C. Oversight, Transparency, and Access Controls**

Produce policies or guidance governing access to Senior Roles, including:

- Posting and competition requirements;
- Transparency of opportunities; and
- Interaction between temporary or contract pathways and permanent appointments.

Identify any instances during 2020–2025 where offers or appointments to Senior Roles were rescinded or materially altered, and produce records sufficient to show the rationale and approvals.

**D. Public-Interest and Organizational-Stability Oversight**

Produce any assessments, audits, or reviews conducted during 2020–2025 evaluating:

- Leadership stability and turnover risk at Subsidiaries; and
- Implications for workforce continuity, labour relations, or growth readiness.

Identify any parent-level interventions or escalations undertaken in response to leadership or HR/LR risk at a Subsidiary.

**Privilege and Non-Existence**

If any responsive record is withheld on the basis of privilege, produce a privilege log identifying the document, date, author, recipient, and basis of the claim, together with a non-confidential description of its subject matter.

If any requested record does not exist, state this explicitly.