

LAURENTIAN PILOTAGE AUTHORITY DETAILED ACTION PLAN
to the recommendations of the Special Examination Report of the Auditor General of Canada

Report Ref. No.	OAG Recommendation	Departmental/Organisation Response	Description of Final Expected Outcome/Result	Expected Final Completion Date	Key Interim Milestones (Description/Dates)	Responsible Organization/ Point of Contact (Name, Position, Tel #)	Indicator of Achievement (For Committee Use Only)
25	The corporation should establish a regular disclosure process for members of the Board of Directors covering all types of conflicts of interest, and should document any measures taken, if necessary.	<p>Agreed. The corporation will improve the current disclosure process by December 2023 so that it covers all types of conflicts of interest and will document any measures taken to address disclosed conflicts of interest.</p> <p>In addition, as of March 2023, an item will be systematically added to the Board of Directors' meeting agenda so that at the start of meetings, members can declare conflicts of interest, if necessary.</p>	<p>Development and implementation of a documented process for declaring conflicts of interest, including measures to be taken in the event of declared conflicts.</p> <p>Inclusion on Board agendas of a mandatory declaration of conflict of interest at the start of each meeting.</p>	<p>November 2023</p> <p>March 2023</p>	<p>Completed November 2023</p> <p>Completed March 2023</p>	General Counsel and Corporate Secretary	
26	The corporation should establish a code of conduct for members of the Board of Directors and ensure compliance with the code.	Agreed. A draft code of conduct for members of the Board of Directors was submitted to the Governance and Human Resources Committee in August 2022. The corporation will put in place an annual process for board members to declare their compliance with the code. The corporation will finalize the code and implement the process for compliance with the code by fall 2023.	Finalization and approval of the code of conduct for the Board of Directors. Establishment of an annual process for Board members to adhere to the Code.	November 2023	Completed November 2023	General Counsel and Corporate Secretary	
29	The corporation should put in place a process enabling employees to declare their compliance with the code of conduct, supported by an annual conflict-of-interest disclosure process, and should report on this to the Board of Directors. The corporation should also provide the board with complete information on risk management.	<p>Agreed. The corporation will put in place a process enabling employees to declare their compliance with the code of conduct and annually disclose all types of conflict of interest, starting in fall 2023.</p> <p>In addition, as of December 2023, the corporation will provide the Board of Directors with complete information on the results of its conflict-of-interest disclosure process.</p> <p>Concerning risk management, since November 2022, the corporation has been providing additional information to</p>	<p>Development and implementation of an annual procedure for employee attestation to the LPA Code of Conduct and disclosure of conflict of interest.</p> <p>Integration of conflict-of-interest disclosure reporting into the Board of Directors' work plan.</p> <p>Inclusion of monitoring of key corporate risks at all audit committees, and discussion of developments and progress on related action plans.</p>	<p>December 2023</p> <p>December 2023</p> <p>November 2022</p>	<p>Completed December 2023</p> <p>Completed December 2023</p> <p>Completed November 2022</p>	<p>Executive Director, Talent and Communications</p> <p>General Counsel and Corporate Secretary</p> <p>Executive Director, Finance and Administration</p>	

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		the Audit Committee about monitoring the main risks.					
33	The corporation should regularly monitor progress against the performance indicators and targets it has set in support of its strategic objectives and should report on that progress to the Board of Directors.	Agreed. The corporation plans to review the performance indicators and targets by fall 2023 to ensure that they are adequate and relevant. In addition, starting in March 2024, the corporation will regularly monitor the performance indicators and targets and will report back to the Board of Directors.	New list of indicators associated with targets and development of a monitoring process via dashboard. The dashboard will be integrated into the Board's work plan.	March 2024	Completed March 2024	Executive Director, Finance and Administration	
40	The corporation should monitor the implementation of risk mitigation measures, take the necessary actions should such measures not be in place, and report on progress to the Board of Directors.	Agreed. Starting in summer 2023, the corporation will strengthen its monitoring of the implementation of mitigation measures for the main risks identified. It will document the necessary actions taken and will report to the Audit Committee on the progress made.	A follow-up of risks and mitigation measures is instituted and presented to the Audit Committee. Improvements will be made to the monitoring process initiated in October 2022.	November 2022	Completed November 2022	Executive Director, Finance and Administration	
41	The corporation should develop and test a business continuity and disaster recovery plan.	Agreed. The corporation will develop a comprehensive business continuity and disaster recovery plan, which will include the existing emergency and recovery procedures to follow in the event of computer failures. This plan will be adequately tested. All of this work will be completed in spring 2024.	Up-to-date emergency and business continuity plan with a defined review process and plans for annual testing of critical aspects of the plan.	June 2025	July 2024 Finalizing the plan Fall 2024 Employee training January 2025 Plan testing	Executive Director, Finance and Administration	
42	The corporation should set its risk appetite and tolerance levels.	Agreed. The corporation expects to finish its review of its risk management policy by spring 2024. As part of the review, the corporation will set its risk appetite and tolerance levels.	A revised policy incorporating the LPA's level of risk appetite and tolerance, as approved by the Board of Directors.	September 2024		Executive Director, Finance and Administration	

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55	The corporation should conduct monitoring to ensure that the safety measures set out in the operating manuals for the pilot boats at Les Escoumins station are implemented.	Agreed. By May 2023, the corporation will develop and implement a plan for monitoring the measures set out in the operating manuals.	Plan for monitoring application of safety measures described in operations manuals.	May 2023	Completed May 2023	Executive Director, Maritime Safety and Efficiency	
56	The corporation should increase its oversight of the pilot boarding safety measures put in place by the independent organization.	<p>Agreed. The corporation will increase its oversight by developing and implementing a plan by July 2023 for monitoring the safety measures set out in the current boarding services contracts.</p> <p>In addition, the new boarding services contracts that come into effect in 2024 will include additional indicators and oversight tools, which will enable the corporation to increase its oversight of the independent organization's operational safety measures.</p>	Clear follow-up plan for review, inspection, and monitoring of our service provider's safety measures (outsourcing).	December 2023	<p>Completed Follow-up plan July 2023</p> <p>Completed Inspection July-December 2023</p>	Executive Director, Maritime Safety and Efficiency	
59	The corporation should obtain and approve the pilot training programs and apprenticeship programs for apprentice pilots and should follow-up to ensure their completion.	<p>Agreed. By December 2022, the corporation had received all pilot training programs and expects to approve them by March 2023.</p> <p>The apprenticeship programs for apprentice pilots will be obtained and approved by December 2023.</p> <p>The corporation will implement a tracking process to ensure their completion once the regulations governing these matters enter into force.</p>	<p>Pilot training plans approved for both corporations.</p> <p>Apprentice pilot training plans approved for both corporations.</p> <p>Clear process for tracking completion and progress of pilot training.</p>	<p>March 2023</p> <p>December 2023</p>	<p>Completed March 2023</p> <p>Completed December 2023</p> <p>Subject to implementation of related regulations by TC</p>	Executive Director, Maritime Safety and Efficiency	