# Patricia Transportation Company Limited &

## **Bison Transport Inc.**

### **Modern Slavery Act Statement 2024**

Reporting Period: Fiscal year ending December 31, 2023.

Reporting Entities: Bison Transport Inc. and Patricia Transportation Company Limited

This statement serves as a joint report for Bison Transport Inc., and its controlling entity, Patricia Transportation Company Limited (collectively, "Bison") pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the financial year ending December 31, 2023, and sets out the steps Bison has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour was used at any step in the production of goods or of goods imported into Canada by Bison Transport.

Bison has a zero-tolerance approach to any form of modern slavery and is committed to putting controls in place to prevent and reduce the risk that forced labour or child labour is used at any step in our supply chain.

#### **Bison's Structure, Activities, and Supply Chains**

Bison is a Winnipeg-headquartered transportation company established in 1969. Bison is a leading asset-based freight solutions provider with a network throughout Canada, the U.S and Mexico. Bison's growing asset-based fleet includes 3,000 tractors and 10,000 trailers and containers operating throughout North America. Beyond this, Bison has access to thousands of trucks through Logistics Operations, along with container cube and priority access on rail networks across North America. Bison understands its large responsibility to the customers and society when it comes to delivering environmentally conscious transportation solutions. Bison also recognizes diversity and inclusion as a critical business ingredient and therefore, Bison has created a diversified and inclusive workplace.

As one of Canada's largest transportation companies, Bison relies on trusted business partners in both domestic and foreign business affairs. The predominant business of Bison is movement of freight throughout Canada, the U.S and Mexico. For this, Bison invests in purchasing tractors, trailers, and containers to provide services to clients. These are sourced from Canadian vendors as well as international vendors, as is other merchandise sourced for the business.

#### Training provided to employees on forced and child labour

Bison provides relevant training to all new employees as part of employee on-boarding, including general employee conduct to govern safe and ethical behaviour. Each new employee must review Bison's Anti-Trafficking In Persons Policy as part of the on-boarding process. The training is mandatory for all new employees and includes a written test to demonstrate understanding and knowledge around the Anti-Trafficking In Persons Policy. Bison also provides further tailored training to the employees, for example Bison's Drivers, whose work involves encountering risks of forced and child labour due to the nature of the job. In addition to this, it is mandatory for all Bison employees to review the Minimum Age Policy and Child Labour Violations Procedures which are made available on Bison's internal shared network. These policies are periodically reviewed by Bison's Human Resource department and updated as needed.

#### Policies and due diligence processes in relation to forced labour and child labour

Bison has due diligence processes in place to fight against forced labour and child labour in many of its business practices and has taken proactive steps by embedding responsible business conduct into its policies and management systems. Bison is in the process of assessing the adverse impacts in its operations, supply chain, and business relationships to ensure that proper policies and due diligence processes are in place.

Statements of compliance are used with select contractors and business partners to confirm compliance with certain standards, including prohibition on the use of forced and bonded labour and child labour. Contractors signing the statement of compliance may be subject to auditing by Bison or its appointed auditing organisation. Additionally, Bison has established policies with the goal of standing firm against forced or child Labour and provides remediation measures when appropriate, including:

- Minimum Age Policy: Bison requires that all of its staff ensure that young workers are treated according to the law. HR assesses the work performed when hiring students under the age of 18 to ensure that the standards are met. This is mandatory for all employees to review.
- Child Labour Violations Procedure: Bison has procedures listed for handling suspected violations in the event that the child Labour is found or suspected at Bison or its sub-contractors.
- Anti-Trafficking In Persons Policy: All employees are subject to the Anti-Trafficking In Persons Policy. The policy forms part of Bison's Employee Manual. Employees who become aware of potential violations of the policy or any related laws or regulations have an obligation to report these concerns to Bison, so they may be reviewed and addressed in an ethical and responsible manner.

#### **Business and supply chains risks**

Bison has identified risks and is continuing to work towards identifying the emerging risks around forced or child Labour. The risks are predominantly identified around the containers that Bison sources from international vendors. Although no cases of child labour have been identified and reported in the past, Bison acknowledges that the type of the industry in which it operates (Transport) poses risks and exposure to child and forced labour. Additionally, there are risks associated with the use of outsourced, contracted, or subcontracted labour.

Bison has procedures in place for the handling and follow-up of an identified or suspected instance of child labour at Bison or its sub-contractors. As soon as a violation is confirmed, the supplier must prepare a Corrective and Preventive action plan done in dialogue with Bison.

Measures taken to remediate any forced or child labour and Measures taken to remediate the loss of income to the most vulnerable families.

There have been no instances of forced or child labour identified or reported in the past in either the operations or, to our knowledge, the supply chain of the company and therefore no remediation measures have been taken. However, Bison does have a policy in place in the event child labour is confirmed at Bison or a sub-contractor which sets out the steps to be taken, including preventative measures.

How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

Bison has set policies in place to address forced and child labour and is committed to regular review of policies and procedures. Bison tracks completeness of the training for new employees around the existing policies and procedures.

Bison is committed to "Truckers against trafficking program" which works to address trafficking issues across North America. Trafficking in persons includes any forced labour, debt bondage, involuntary servitude, sex trafficking or commercial sex acts. This policy governs Bison as a whole, its employees, contractors, suppliers, consultants, third party representatives and subcontractors.

Bison is also committed to work in the future to build a process to prevent forced and child labour within its business and supply chains.

#### Conclusion

This report is completed to fulfill the obligation of Patricia Transportation Company Limited and Bison Transport Inc. to report annually pursuant to the Act. Bison stays firm and supportive of the Act to fight against forced labour and child labour. Bison understands the importance of ongoing diligence and will continue to monitor the controls to ensure compliance with existing policies. Bison is committed to identifying the emerging risks and working with suppliers on the stated policies to align with the requirements of the Act.

#### Attestation and Board Approval

In accordance with the requirements of the Act, and in particular sections 11 and 11(4)(b)(ii) thereof, I attest that I have reviewed the information contained in this report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the above report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above. I have the authority to bind Patricia Transportation Company Limited and Bison Transport Inc.

Signature

Date

First and Last Name

Title