

Prepared pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Act”)

## Introduction

This report is filed by C. H. Robinson Company (Canada) Ltd. (“**CHR Canada**” or the “**Company**”) for the financial year ending December 31, 2023 (the “**Reporting Period**”). The report sets out the steps that the Company has taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the Company or of goods imported into Canada by the Company. The report also provides supplementary information as is required under the Act.

## Structure, Activities, & Supply Chains

CHR Canada is incorporated under the *Canada Business Corporations Act* and has its principal place of business at 610 Applewood Crescent, Suite 601, Vaughan, ON. CHR Canada is the Canadian subsidiary of C. H. Robinson Worldwide, Inc. (“**CHR**”) a Delaware corporation headquartered in Eden Prairie, Minnesota. CHR is a global transportation business offering ocean, air, and surface freight transportation, transportation management, customs brokerage, freight forwarding, and warehousing, among other services, with more than 300 offices and over 15,000 employees in North America, Europe, Asia, and South America.

Globally, CHR entities, including CHR Canada, are non-asset based companies and thus enters contractual relationships with a wide variety of transportation companies and utilize those relationships to arrange the transportation of our customers’ freight efficiently and cost-effectively. CHR work with over 73,000 of these contracted transportation companies, including contracted motor carriers, railroads (primarily intermodal service providers), and air and ocean carriers in a number of regions including in North America, Europe, Asia, Oceania, and South America.

CHR Canada is comprised our North America Surface Transportation (“**NAST**”) and Robinson Fresh business lines.

### **NAST**

NAST provides transportation and logistics services across North America through a network of offices in the U.S., Canada, and Mexico. The primary services provided by NAST include truckload and less than truckload (“**LTL**”) transportation brokerage services.

#### Truckload

Through our contracts with motor carriers, we have access to dry vans, temperature controlled vans, flatbeds, and bulk capacity. We connect our customers with contracted motor carriers that specialize in their transportation lanes and product types, and we help contracted motor carriers optimize the usage of their equipment.

#### LTL

LTL transportation involves the shipment of single or multiple pallets of freight. We primarily focus on shipments of a single pallet or larger, although we handle any size shipment. Through our contracts with motor carriers and the use of Navisphere, we consolidate freight and freight information to provide our customers with a single source of information on their freight. In many instances, we consolidate partial shipments for several customers into full truckloads.



## Robinson Fresh

Robinson Fresh consists primarily of the buying, selling, and/or marketing of fresh fruits, vegetables, and other value-added perishable items. We supply fresh produce through a network of independent produce growers and suppliers. Our customers include grocery retailers, restaurants, foodservice distributors, and produce wholesalers. In many cases, we also arrange the logistics and transportation of the products we sell and provide related supply chain services, such as replenishment, category management, and managed procurement services. We have developed proprietary brands of produce and have exclusive licensing agreements to distribute fresh and value-added produce under recognized consumer brand names. The produce for these brands is sourced through a preferred grower network and packed to order through contract packing agreements, before being imported into Canada by CHR Canada. We have instituted quality assurance and monitoring procedures with each of these preferred growers.

## Steps Taken To Prevent And Reduce The Risk That Forced Labour And Child Labour Are Used At Any Step Of The Production Of Goods Or Of Goods Imported Into Canada

CHR is committed to upholding the highest standards of business conduct. Consistent with this commitment, during the Reporting Period, CHR Canada took the following steps to reduce the risk that forced labour is used in its production and importation supply chains:

- Continued to apply CHR group policies described elsewhere in this report, including its Human Rights Policy, Third Party Supplier Code of Conduct, Non-Retailing and Reporting Mechanism.
- Administered training to employees on CHR group policies.
- Continued to ensure that suppliers complied with CHR group policies respecting forced and child labour.
- Engaged and monitored suppliers with respect to forced and child labour.

## Due Diligence Processes & Policies In Relation To Forced Labour And Child Labour

CHR Canada is subject to CHR group due diligence processes and policies, including its detailed Human Rights and Anti-Human Trafficking Policy in the global Code of Ethics and the global contingent worker Code of Ethics. All CHR group employees attest and acknowledge this policy upon hire and annually. Additionally, employees are trained on the Code of Ethics upon hire and regularly thereafter.

### Human Rights Policy

CHR's [Human Rights Policy](#) outlines its commitment to managing its business with the belief that all people, regardless of their nationality, religion, place of origin, sex, language or any other status, should be treated with integrity and respect. It is a fundamental value within CHR's cultural integrity, and one that it expects all group companies and business partners to maintain.



### Protecting Others

CHR is committed to protecting the human rights of our team and business partners globally and the communities where we operate. For CHR Canada, this is reflected in issues such as equal opportunity and fair treatment, compliance with national and local regulations on wages and work hours, a safe working environment and privacy and proper handling of Personally Identifiable Information (PII).

### Human Rights in Communities

CHR hopes to positively impact human rights within the communities in which we operate. We do not tolerate exploitation, human trafficking, forced or child labour, slavery or human rights abuses of any kind. We expect customers and suppliers to uphold their strong principles and encourage them to adopt similar practices within their own businesses. As part of our broad effort, respecting human rights and dignity is integrated and valued in all we do.

### Alignment with our Mission, Vision, Values and Leadership Principles

CHR earns the trust of our team and stakeholders by acting upon our strong mission, vision, values and Leadership Principles and our policies reflect these values. Our policies exhibit our commitment to respecting human rights and employment practices, such as our Global Data Privacy Policy, Anti-Bribery and Anti-Corruption Policy, Anti-Money Laundering Policy and our Non-Discrimination and Anti-Harassment Policy.

### Anti-Human Trafficking Policy

CHR does not permit child, prison, forced or trafficked labour in our operations. CHR Canada employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom we conduct business must avoid complicity in any practice that constitutes trafficking in persons or slavery, which includes but is not limited to the illegal movement of people, trafficking in persons, sexual exploitation, and the use of forced or child labour of any form.

Pursuant to the Anti-Human Trafficking Policy CHR Canada, its employees, contractors, subcontractors (including suppliers and agents), contingent workers and others performing work on behalf of CHR Canada are prohibited from:

- Engaging in any form of trafficking in persons.
- Procuring illegal commercial sex acts.
- Using forced labour in the performance of the contract.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents.
- Using misleading or fraudulent recruitment practices, such as failing to disclose basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, and, if applicable, the hazardous nature of the work.
- Charging employees or candidates recruitment fees.



Consistent with Integrity at CHR Canada, team members are expected to treat all people with fairness, dignity and respect.

CHR and CHR Canada are committed to acting against human trafficking, child labour, and forced labour in our operations. If such activity occurs, the CHR Canada response may include terminating employment, contracts and other such measures that will ensure no further inappropriate activity occurs. Any team member that believes they have been a victim of human trafficking, child labour or forced labour, or has knowledge of such offenses should exercise their right within our policy to report such incident to Human Resources, the Legal Department or utilize the anonymous reporting process. Any team member aware of possible violations of these policies is required to immediately report the situation.

### **Third Party Supplier Code of Conduct**

In addition, CHR has a [Third Party Supplier Code of Conduct](#) that set out the minimum expectations for all group suppliers and third party labour providers, including those supply CHR Canada, related to ethical practices including addressing modern slavery (including forced and child labour) risks in their business. CHR's aim is to ensure that all members in our supply chain, inclusive of our contractors are all aware of the importance of addressing and mitigating any sign of modern slavery existing in their business.

#### *Human Rights of Workers*

Third Party Suppliers of CHR Canada are expected to uphold the human rights of workers and to treat them with dignity and respect. Compliance with fair labour and antislavery practices that allow for freely chosen employment is required, which includes the prohibition of child labour, human trafficking, and slavery. Additionally, the adherence to applicable wage and labour laws and standards is required. Physical abuse, sexual or other harassment, and discrimination on the basis of race, religious creed, caste, national origin/ancestry, genetic information, military and protected veteran status, religion, age, disability, gender, gender identity or expression, pregnancy, marital status, sexual orientation, union membership, political affiliation, or any other characteristic protected under applicable law or local ordinance is strictly prohibited. Suppliers are expected to follow guidelines of the ILO (International Labor Organization).

#### ***Non-Retaliation and Reporting Mechanisms***

CHR also has a non-retaliation policy applicable to CHR Canada, and multiple ways of reporting concerns, including an anonymous third-party global reporting phone and web-based system are available to group employees. All reports are reviewed by Legal, Human Resources and our Internal Audit teams and any issues of non-compliance are addressed immediately.

#### ***Supplier Monitoring & Engagement***

CHR and CHR Canada expect that third party suppliers share our commitment to ethical and responsible business. As a condition of doing business with CHR and CHR Canada, it is required that third party suppliers comply with all laws applicable to the country of operation. Such laws include but are not limited to law related to labour practices, health and safety, environmental responsibility and laws that protect workers and their salaries. To further the objective of ensuring compliance with laws, including the protection of workers, CHR and CHR Canada have adopted and issued to its Suppliers a clear statement of its standards in the Third Party Supplier Code of Conduct.





CHR's procurement processes work to build a global network of responsible suppliers. In 2021, CHR launched a public business supplier portal for easy, immediate access to the CHR Supplier Code of Conduct and the Information Security Addendum. Having our commitments front-and-center ensures all stakeholders are aware of our expectations and conduct business in line with our values.

## Activities And Supply Chains That Carry A Risk Of Forced Labour Or Child Labour Being Used And The Steps Taken To Assess And Manage That Risk

CHR Canada's two business lines, NAST and Robinson Fresh, involve different activities and supply chains. NAST provides non-asset based transportation and logistics services across North America through a network of offices in the U.S., Canada, and Mexico and therefore presents a low risk of forced or child labour. The Robinson Fresh supply chain involves sourcing produce and other perishables from a preferred network of growers and suppliers outside Canada. Given that CHR Canada sources agricultural products from jurisdictions outside Canada where labour standards and legal enforcement may be weaker, there is a risk of forced and child labour in the sourcing of these products.

To manage these risks CHR Canada relies on the robust due diligence processes and group policies described elsewhere in this report that collectively minimize the risk of forced and child labour in our supply chains.

The table below summarizes key forced and child labour risks within CHR Canada's activities and supply chain.

Sector	Description	Steps Taken
<b>Employee Base</b>	CHR Canada's workers are primarily office-based in Canada, white collar workers with a high school or university qualifications. All staff are paid (at a minimum) in accordance with all legal minimum terms and conditions of employment.	Continue to regularly review employment practices and policies, train workers and adhere to applicable legal requirements and CHR group policies.
<b>Services Provided</b>	The NAST division of CHR Canada represents a low risk of forced or child labour because a high proportion of suppliers being sourced from within Canada.  Robinson Fresh services in Canada may present a risk based on the grower industry risk overall and sourcing goods from outside of Canada.	Continue to issue Third Party Supplier Code of Conduct; continue to engage with and monitor suppliers.

## Measures Taken To Remediate Any Forced Labour Or Child Labour



CHR Canada is not aware of any incidents of forced or child labour in its supply chain and therefore the issue of remediation has not arisen.

## Measures Taken To Remediate The Loss Of Income To The Most Vulnerable Families That Results From Any Measure Taken To Eliminate The Use Of Forced Labour Or Child Labour In Its Activities And Supply Chains

CHR Canada is not aware of any loss of income to families resulting from any measures taken to eliminate the use of forced or child labour in its supply chains and thus the question of remediation has not arisen.

## Training Provided To Employees On Forced Labour And Child Labour

CHR Canada employees complete required training on applicable CHR policies, which address forced and child labour, upon hire and regularly thereafter. CHR Canada also has optional self-led training that address forced and child labour available via an online course, video and book library.

## How CHR Canada Assesses Its Effectiveness In Ensuring That Forced Labour And Child Labour Are Not Being Used In Its Activities And Supply Chains

CHR Canada is committed to reviewing the effectiveness of our actions by regularly reviewing our forced labour, child labour, and modern slavery processes to ensure we are appropriately identifying and evaluating our risks. CHR Canada will continue to regularly review our practices, train employees and track and appropriately address any reported violations or concerns.

## Approval & Attestation

This report is approved and attested, as required under paragraph 11(4)(a) and subsection 11(5) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Per: Scott A. Shannon  
Scott A. Shannon (May 30, 2024 13:51 CDT)

Name: Scott A. Shannon

Title: Director

Date: May 30, 2024

*I have the authority to bind C. H. Robinson Company (Canada) Ltd.*

