

Joint CEVA Logistics Statement on the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

1. Introduction

CEVA Logistics (and all its operating subsidiaries, referred to herein as "CEVA" and/or "The Company") is committed to respecting and valuing human rights and environmental laws on a global scale. Operating ethically and respecting employees, customers, and stakeholders are fundamental core values at the heart of CEVA's corporate culture. This, of course, includes Canada, where CEVA operates under the denominations of CEVA Logistics Canada ULC and CEVA Freight Canada Corp.

Within this basic statement under the Fighting Against Forced Labour in Supply Chains Act or any other law or act applicable to our Group companies, we at CEVA have committed ourselves to uphold the highest ethical standards:

- This fundamental commitment guides our actions and is critical to upholding our social responsibility.
- This basic statement applies to the CEVA Logistics Group, including **all Group companies** over which we have direct or indirect control, as well as our employees and business partners along our entire supply chain.

2. Countries of Operation and Supply

CEVA is a leading global logistics company operating in almost all countries worldwide and offering integrated, end-to-end logistics solutions to deal with the complexities of today's supply chains.

In accordance with the requirements of the Fighting Against Forced Labour in Supply Chains Act (subsidiary companies, shareholders, customers, and business partners must implement the defined mandatory legal requirements. We assume responsibility for society, employees, and the environment. Human rights exposure and environmental risks at CEVA are assessed, avoided, or reduced, and comprehensively controlled through CEVA's global Corporate Social Responsibility, Quality, Health, Safety and Environment, and Ethics and Compliance programs.

3. Organizational Structure and Supply Chains

Through CEVA's lean culture and Operational Excellence, the Company addresses increased demand for operational efficiency and flexibility. CEVA's ability to structure operations around customers' Key Performance Indicators and robust industry experience helps the Company stay focused on specific logistics needs, deliver value-added service, and run its business in an environmentally conscious way.

4. CEVA Policies and Supply Chain Relationships

CEVA continually strives to communicate its human rights policies and expectations to its customers, third-party suppliers, and agents. As a global logistics company, CEVA does not inherently produce or manufacture products. In providing logistics services, it is imperative to ensure employees and third parties are alert, especially to the relevant human rights legislations, and are aware of CEVA's internal policies that promote human rights and the fight against the proliferation of human trafficking, forced labour, child labour and modern slavery.

CEVA's Human Rights Compliance Program (HRCP) is risk based and communicates ethical business practice expectations and standards to our employees, customers, and suppliers. These are incorporated into Compliance Covenants, which are acknowledged by targeted CEVA suppliers and agents with an incremental inherent risk profile. Additionally, the CEVA Code of Business Conduct, One CEVA Code (available at <https://www.cevalogistics.com/en/who-we-are/commitments/corporate-governance-information/COBC>) outlines CEVA's continued commitment to promoting an ethical corporate environment and complying with all laws, including those prohibiting human trafficking, slavery, forced labor, child labor, unfair wages, and restrictions on the formation of trade unions or worker representation.

CEVA is committed to:

- Paying the legal minimum wage by the respectively applicable laws.
- Opposing any disregard for internationally recognized human rights.

In addition, certain environmental risks are considered when they lead to human rights violations or when it comes to the prohibition of substances that are dangerous to people and the environment.

We expect all employees as well as suppliers and business partners to take these principles of our corporate culture into account.

5. Due Diligence & Auditing

As part of its global compliance program, audits and reviews are conducted, including HRCP requirements, the specific review of risks, associated mitigating measures, and red flags. Further, CEVA has a dedicated risk-based third-party due diligence program to ensure that high, medium, and tailored-risk third parties operate in compliance with all applicable laws (including corruption and human rights) and employs a global restricted party screening policy.

6. Training & Awareness

All CEVA managers and a selected employee population are required to complete an annual Ethics & Compliance training including aspects of the HRCP, including red flags, and reporting potential concerns on human rights. Additional human rights training is provided to employees when warranted.

7. Risk Assessment and Continued Risk Management

7.1 Risk Management in the Own Business Area

CEVA's own business area risk management mainly consists of risk analysis and preventive and remedial actions.

Risk analysis.

The basis of CEVA's actions in the context of corporate due diligence is a comprehensive risk analysis. Findings obtained in the course of the implementation of measures and complaint mechanisms are incorporated into the risk identification in the sense of continuous improvement of the processes.

In addition, CEVA Logistics carries out an event-related risk analysis when a new product is introduced, or a new business area is added, or other significant changes are made in business operations.

Risk assessment.

After analyzing and identifying any risks, negative effects on people and/or the environment are substantiated by control measures such as an audit, questionnaire, or interview.

Using established processes, we identify and prioritize risk areas and potentially affected parties from within our own business area.

If a risk is assessed as high, the management is informed, and appropriate remedial measures are initiated.

Prevention measures in own business area

Employees are required to comply with the **One CEVA Code**. CEVA provides mandatory ethics and compliance training to its employees on the Ethics & Compliance platform. These specific trainings address ethical decision-making and risks related to business functions at CEVA Logistics. Completion is tracked, monitored, and documented. Provision is also made for the transfer of the relevant expertise to the business units.

Employees are encouraged to report any suspected violations.

Labor law, occupational health and safety, and environmental protection requirements are complied with through appropriate functional areas and organizational process structures.

Remedial measures in the own business area

Speak-up Rules & Principles (Whistleblowing policy): CEVA encourages all its employees, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of CEVA. This includes any circumstances that may give rise to an enhanced risk of human rights violations. CEVA maintains a hotline and web-based reporting system, which allows individuals to report anonymously if desired in the local language on any potential compliance concerns including concerns related to labor practices or breaches of human rights.

When a (potential) violation of human or environmental rights is reported, various corrective actions are taken to prevent, mitigate, or eliminate the violation. If we, as CEVA, have caused a violation of human or environmental rights, we work immediately to stop the activities that caused it.

The reporting and prosecution of the incident are properly controlled and documented. Civil and criminal consequences are taken depending on the severity of the violation.

Employee Code of Conduct: CEVA's Code of Conduct supports the Company's employees in maintaining the highest standards of conduct and ethical behavior when operating and managing its supply chain.

Recruitment and Selection Policy: CEVA uses only specified, reputable employment agencies to source labor and always verifies the practices of any new agency it is using before accepting workers from that agency. CEVA is committed to preventing the use of slavery or the employment of child labour in our business

and our supply chain and encourages employees to look out for signs of slavery and child labour and report to the relevant manager immediately, e.g., (a) physical and psychological abuse; (b) restricted movement; (c) poor living conditions; and (d) lack of personal belongings, such as their passport, (e) employment of child labour, as defined by the Fighting Against Forced Labour and Child Labour in Supply Chains Act .

7.2 Risk Management with Direct Suppliers

Preventive measures with direct suppliers

CEVA's **Supplier Compliance Covenant** forms the basis for supplier relationships with basic principles, standards to be met, and requirements relating to sustainability.

The Compliance Covenant and any conditions of purchase as well as specific Standard Operating Procedures oblige suppliers of CEVA to comply with human rights and related environmental rights. When entering a new contractual relationship, the Compliance Covenant should be signed by targeted CEVA suppliers and agents with an incremental inherent risk profile.

These vendors and agents are obliged to comply with the provisions of the Compliance Covenants and are also required by CEVA to ensure that their respective suppliers do so in an appropriate manner, for example by agreeing sustainability principles with their suppliers.

These preventive measures are checked annually as well as on an ad hoc basis.

Remedial action with direct suppliers

If CEVA identifies a breach of the above obligations at a supplier, action will be taken to prevent, mitigate, or minimize the breach. If immediate cessation of the breach is not possible, a concrete approach to minimizing the breach will be developed with a precise timetable.

CEVA reserves the right to temporarily suspend the business relationship with the violating supplier.

If the risk minimization fails and no mitigating means are available, CEVA will not continue the business relationship.

The successful implementation of the risk-minimizing measures as well as the resulting cessation of the violation are also properly documented.

7.3 Indirect Suppliers

CEVA also ensures its due diligence obligations towards indirect suppliers.

If there are concrete indications or substantiated knowledge that a violation of human rights or environmental obligations cannot be ruled out, a risk analysis is carried out at the indirect supplier. Appropriate control and remedial measures will also be carried out in this case.

8) Performance Indicators

CEVA is permanently reviewing the effectiveness of the implemented processes and performances. As a result, CEVA is:

- Requiring all staff, supply chain managers, and HR professionals to complete CEVA's Global Compliance Training comprising a module on human rights on an annual basis.
- Developing a system for supply chain verification whereby CEVA evaluates potential suppliers before they enter the supply chain; and
- Reviewing its existing supply chains whereby CEVA monitors targeted suppliers.

CEVA regularly reviews the effectiveness of the measures taken concerning risk prevention and remediation.

If changes to the measures are necessary, these are reviewed and implemented.

In this context, suppliers and compliance officers are required to provide information on the effectiveness of the measures in place. CEVA also investigates indicators of human rights violations and monitors the effectiveness of the associated training and development measures.

If the agreed prevention and remediation measures are not properly implemented or not complied with, the escalation process defined by CEVA Logistics comes into effect.

9) Complaints, Speaking up Channels

CEVA's Ethics and Compliance Helpline enable the reporting of potential or actual violations of any human right, environmental obligations, the One CEVA Code, E&C rules and principles, or any other applicable laws, caused by the actions of its own employees or (direct/indirect) suppliers or any other third party, through the establishment of hotlines/email addresses/websites, complaint forms and internal/external contact persons.

Reporting of complaints can be made anonymously. The identity of the reporting person will be treated as confidential even if such person is disclosing its personal data within the report.

Receipt of all incoming reports will be confirmed to the reporting person if a contact is available.

The persons entrusted with the supervision and processing of the complaint's procedures are not bound by internal instructions and are sworn to secrecy to ensure impartial trading.

Based on the internal guidelines of CEVA, which are defined in particular in the "Speaking Up & Retaliation Prevention" guideline and the "Speaking Up" section in the "One CEVA Code", reporting persons do not have to fear any negative consequences as a result of their report. This does also apply if it turns out that the facts described in the report are not correct. CEVA's reporting procedure is based on confidentiality and data protection.

If, because of a complaint, it is determined that CEVA or its direct or indirect suppliers have violated or are about to violate human and/or environmental rights, corrective action will be taken immediately to prevent, stop, or minimize the violation.

Such measures may include but are not limited to, consequences under labor law, review of business relationships and/or contractual basis, and other internal and external improvement processes.

The effectiveness of the grievance procedure is reviewed regularly, at least once a year, and on an ad hoc basis.

10) Documentation and Reporting

CEVA prepares a report at least once a year on identified risks and potential violations of human and environmental rights in its own business operations and/or (un)indirect suppliers, as well as the measures taken to prevent/minimize/eliminate the risk or violation.

Where appropriate, new preventive measures are also defined for the future.

The annual report is published on the CEVA website and is available there free of charge for a period of seven (7) years. CEVA prepares and submits the annual report based on the questionnaire provided by the Minister of Public Safety and Emergency Preparedness.

Any additional reports are made based on the applicable and current statutory requirements.

CEVA also reports under supply chain legislation in other jurisdictions:

- The United Kingdom's Modern Slavery Act 2015;
- Australia's Modern Slavery Act 2018;
- French Duty of Vigilance Law;
- German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG).

11) Priority of Human Rights and Environment-Related Risks

CEVA does not tolerate any violations of human rights laws by its employees and has established remedial measures contained in the HRCP that include suspension and/or removal of employees found in violation. CEVA will continue to update its policies and procedures as required to ensure that the Company maintains a high level of integrity and respect in its business operations as well as its supply chain.

For CEVA, respect for human and environmental rights is an essential part of sustainable business operations and a continuous process that should always be improved.

This includes the prohibition of the production of products containing mercury and the use of persistent organic pollutants.

12) Contact

For questions and comments on the policy statement or other human rights or environmental issues, please contact: Pablo L. Tomaselli, Ethics & Compliance Officer US and Canada, CEVA Logistics. Email: pablo.luis.tomaselli@cevalogistics.com. Telephone: +1 (281) 965 6703.

13) Final Provision

The policy statement comes into force on 01 January 2023. It was developed in cooperation with the responsible specialist departments of CEVA.



We review this policy statement annually and on an ad hoc basis and update it if new risks arise or changes processes are introduced.

All activities of CEVA in connection with this policy statement and the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act are carried out in compliance with the relevant regulations regarding data transfer and data protection.

CEVA's Annual Report, as prescribed by the Fighting Against Forced Labour and Child Labour in Supply Chains Act is filed annually with the Minister of Public Safety and Emergency Preparedness (Part 2, Sections 11, 12 and 13 – subsection 1 – of the aforementioned Act) and can be found on CEVA's website.

This statement has been approved by the Directors of CEVA Logistics in Canada (including CEVA Logistics Canada ULC and CEVA Freight Canada Corp.).

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 reporting year listed above.

I have the authority to bind CEVA Logistics (including CEVA Logistics Canada ULC and CEVA Freight Canada Corp.).

Signed by:

Brian Holden

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Brian Holden,

Ocean Leader, North America

Date: September 10th, 2024