



## Fighting Against Forced Labour and Child Labour in Supply Chains Act Fiscal Year 2023 Report

This report is prepared by Camin Cargo Control, Inc. (“Camin Cargo”) for itself and on behalf of its subsidiary Camin Cargo Control Canada, Inc. (“Camin Cargo Canada” and, together with Camin Cargo, , “we”, “us”, and “our”) for the fiscal year ending December 31, 2023 (“Fiscal Year 2023”) in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). This report summarizes the steps taken during Fiscal Year 2023 to prevent and reduce the risk that forced labour and/or child labour are used at any step of the production of goods that are sold, produced, or distributed by us.

### Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

We are committed to high standards of ethical, moral, and legal business conduct. As part of this commitment, we require all employees to review and certify their understanding of our ethics policies on an annual basis. We also promote open communication with our personnel to ensure that they are empowered to bring to our attention any concerns regarding conduct that is perceived to be unlawful, unethical, or improper. Our personnel can raise such concerns directly with their supervisor, with our Human Resources representatives or Legal representatives, or through our ethics hotline.

Our business is substantially focused on the provision of testing, inspection, and certification services by our personnel rather than the production and/or sale of goods; however, some of our services require the procurement and use of goods. With respect to our personnel, we use pre-employment screening procedures to mitigate the risk of using child labour. We do not utilize forced labour to perform any services.

With respect to the portion of our business that involves the use, sale, and/or importation of goods, we relied during Fiscal Year 2023 on our ethics training and ethics policies to prevent and reduce the risks posed by forced labour or child labour.

### Structure, Activities, and Supply Chains

Camin Cargo is a Texas corporation that provides testing, inspection, certification, and additives services to its customers. Camin Cargo performs the majority of its business outside of Canada, but it does engage in commerce in Canada through its subsidiary Camin Cargo Canada, which is a corporation existing under the *Canada Business Corporations Act*.

In Canada, our supply chain involves the importation, storage, and use of certain substances (the “Additives”) in the context of providing additives treatment services to our customers, with a focus on providing Additives for petroleum products and fuels. Neither Camin Cargo nor Camin Cargo Canada import the underlying substances, such as crude oil or sustainable aviation fuel, for which the Additives are used.

### Policies and Due Diligence Process

Camin Cargo has a written Code of Ethics that enshrines our values and guides our personnel. Among other things, our Code of Ethics includes a clear prohibition against engaging in illegal or unethical conduct, as well as an obligation to implement educational and training programs supporting the understanding and enforcement of the Code of Ethics. Every employee is required to obey the Code of Ethics. Through the stated prohibition against illegal and unethical conduct, our Code of Ethics prohibits the use of forced labour and child labour.

Our personnel are required to review and certify their understanding of the Code of Ethics both as part of the employment onboarding process, as well as on an annual basis. Our personnel also receive annual training materials about the



application of the Code of Ethics, as well as access to the ethics hotline to report any conduct believed to violate our Code of Ethics, which would include the use of forced labour or child labour.

Our vendor onboarding process requires us to engage in “know your customer” activities. Although there are not currently procedures that are specifically designed to address concerns about forced labour or child labour, our process includes identify verification, sanctions screening, trade references, and other diligence procedures designed to give us a better understanding of the nature and quality of our vendors.

### **Risk Assessment**

Neither Camin Cargo nor Camin Cargo Canada have implemented a formal process specifically focused on addressing the risk of forced labour or child labour. However, we continually review and update our processes, and this may change in the future.

Camin Cargo and Camin Cargo Canada engage in commerce that is substantially services oriented. Through our hiring practices and employment screening activities, we are able to effectively mitigate the risk that our services are performed using forced labour or child labour.

Based on the nature of our business, we believe that the risk of forced labour and child labour in our supply chain is low. We will continue to assess and refine our policies and procedures as appropriate.

### **Remediation Activities**

We are not aware of any instances of forced labour or child labour in the context of our personnel or our supply chain. As a result, we did not take remedial measures in Fiscal Year 2023 and did not identify any adverse impacts or loss of income affecting vulnerable persons. We will take investigatory and remedial action in accordance with our policies in the event that we learn of a credible allegation of potential forced labour or child labour.

### **Training**

We will continue to make clear in our Code of Ethics that all personnel are prohibited from engaging in illegal or unethical activity. Camin Cargo will also continue to provide training on the Code of Ethics and require annual certification by all personnel to ensure that they have read and understand the Code of Ethics. We periodically evaluate our policies and the training that we provide, which may result in new or additional training.

### **Assessing Effectiveness**

As of Fiscal Year 2023, Camin Cargo had not implemented any formal policies designed specifically to address the risk of forced labour and/or child labour. Nonetheless, our Code of Ethics prohibits such labour in the context of our employment practices or supply chains and empowers our personnel to report concerns about the same. We did not receive any reports during Fiscal Year 2023 alleging the use of any such labour in contravention of our Code of Conduct.

### **Attestation**

This report has been approved by the Board of Managers constituting the governing body of Camin Cargo and Camin Cargo Canada pursuant to subparagraph 11(4)(b)(ii) of the Act.

In accordance with the requirements of the Act, and in particular Section 11 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 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 Camin Cargo and Camin Cargo Canada

Name: John Hodson

Title: Member of the Board of Managers and  
Chief Executive Officer of Camin Cargo Control, Inc.

Date: May 31, 2024