

Our Commitment, Activities and Supply Chain

Complete Innovations Inc., doing business as Fleet Complete Inc. (“Fleet Complete”), is committed to fulfilling Canada’s international commitment against forced labour and child labour. Fleet Complete is wholeheartedly committed to ethical business practices, and Canada’s international commitment to combat the prevalence of forced labour and child labour in global supply chains. As an international organization, we believe in taking a stand against exploitative labour practise such as forced labour and child labour, and in doing so, provide our unwavering support for a more equitable and just world. Our Global Code of Conduct, our Global Business Integrity Policy and our core values are testament to our highest standards of integrity and our strict adherence to applicable labour standards and regulations. As an organization, we will continue to fully abide by local as well as international laws and regulations.

Fleet Complete is a leading global provider of fleet management solutions, delivering mission-critical fleet, asset, and mobile workforce management solutions. At Fleet Complete, we work with our customers to give them access to a connected mobility platform that suits their needs best. Whether it’s vehicles, mobile workers, cargo, stationary assets, or all of the above, we help them connect to it all. The company serves businesses and government organizations in Canada, the U.S., Mexico, Australia, and across Europe.

While Fleet Complete is not directly involved in the manufacture, sale or distribution of goods, Fleet Complete imports goods from third party suppliers who manufacture in various global markets. These imports include hardware devices and cables which form part of our product solution.

Risk Assessment and Due Diligence

As part of our due diligence, Fleet Complete conducted a full review of its operations, supply chains and business relationships and have worked with our vendors to both understand their current practices to identify and prevent forced labour and child labour and to ensure their continued compliance. We sent a customized questionnaire centred on Bill S-211 to our key suppliers, regardless of location to ensure all are compliant with, and following forced labour and child labour safeguards, as set out by this Bill.

The responses that were received were reviewed by Company management and it was concluded that no issues were identified in our supply chain, with most of our suppliers having their own policies and audits in place to adhere to these human rights against forced labour and child labour. Our conclusion following our due diligence is that Fleet Complete’s supply chains

have not faced situations of forced labour or child labour and therefore no immediate action or remedy is required, however we will continue to monitor to ensure full compliance with Bill S-211.

Remedial Measures:

While we have undertaken a review of our global supply chain, we have also had an opportunity to examine our current practices to ensure continued full compliance with this Bill. To that end, we have proactively implemented the following changes.

- **Global Code of Conduct:** Our global employee base signs this code of conduct at the time of hire and periodically thereafter. A new section has been added under our guidelines on Work Environment, Integrity and Respect to highlight our responsibility to ensure that international exploitive practices such as forced labour and child labour are fully addressed and eradicated as a member of the global business community. In April 2024, we reissued our Global Code of Conduct with the changes to our employee base and asked them to recertify their compliance with this new Global Code of Conduct.
- **Global Business Integrity Policy:** Key suppliers and vendors are required to review and adhere to our Global Business Integrity Policy as part of signing a supplier contract with Fleet Complete. Fleet Complete has most recently updated this policy to reflect Bill S-211 and our position to fully support and be in compliance with Bill S-211. These guidelines apply to our employees, customers and suppliers. A new section has been added to specifically address Bill S-211 and we have also sent these guidelines to our employees for review and recertification in April 2024. Additionally, we are in the process of posting these revised guidelines on our website.
- **Employee Onboarding:** Our Onboarding for new employees has been updated to draw attention to Bill S-211, our policy and stance specific to this bill for employee awareness.
- **Supplier Onboarding and Monitoring:** As part of onboarding new suppliers within our supply chain we will ensure that all contracts include continued compliance with our Global Business Integrity Policy through regular tracking and monitoring.
- **Board Governance:** Our Board received an information update on Bill S-211. We provided information on our obligations, actions and processes to assess and maintain compliance with Bill S-211. As part of its ongoing governance the Board reviewed and approved this report.
- **Risk management:** The organization's policies and procedures related to forced labour and child labour are reviewed by our independent audit committee. The Company also

has whistle blower hotlines for confidential disclosure of any suspected non-compliance.

We will continue to monitor our suppliers and vendors through reviewing our policies and practice on a regular basis, and by conducting random surveys on an ongoing basis.

Ongoing Adherence and Communication

Transparent communication with respect to Fleet Complete's policies and practices to combat forced labour and child labour is an important element to both raising awareness within our employee base and supply chain and ensuring compliance. With these goals in mind, we took the following actions:

- Our website will reflect our stance on forced labour and child labour in terms of compliance and adherence to this Bill. Our report will be available for public review.
- Our CEO issued an internal communication to all of our employees in terms of our commitment to and compliance with the requirements of Bill S-211.
- Any communication with vendors or 3rd parties will call attention to this Bill through our revised Global Business Integrity Policy and we will continue to monitor compliance with the Bill.

In accordance with the requirements of the *Fight Against Forced Labour and Child Labour in Supply Chains Act* (Canada) 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.

Name (Printed): Jarnail Badwal Date: May 29, 2024

Signed:  Location: Ontario, Canada