

This statement is made pursuant to Bill S211 section 6(1) of An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act. It constitutes the FB On Board Courier Inc. statement for the financial year ending 2023.

FB Canada Express Commitment to Ethical Labour Practices 2023

Our commitment

FB Canada Express is committed to conducting business ethically, respecting human rights, and upholding the highest standards of integrity across all its operations and supply chains. This statement outlines the steps we have taken to address the risks of forced labour and child labour in compliance with Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff*.

The culture at FB Express Canada is one of zero tolerance for any form of forced labour, human trafficking, or child exploitation. We are dedicated to promoting ethical business practices and safeguarding human rights throughout our organization and supply chain.

Our continuous improvement mindset will drive us to regularly review and enhance our practices to uphold the highest standards of human rights protection in alignment with Bill S-211 and international guidelines.

Company structure

FB Canada Express is a private corporation with head office in Dorval, Quebec. It has been operating since 1985 and is a leading cross-border logistics provider operating to, from, and within Canada. We work closely with the Canada Border Services Agency (CBSA) and other government agencies to maintain the integrity of Canadian compliance and importing requirements.

Activities and Supply Chains

FB Canada Express engages in the following activities:

- Importing into Canada goods produced outside Canada
- Distributing goods inside Canada
- Warehousing goods on Canadian soil

Our national activities and supply chain includes labour (subcontractors and temporary agency workers), warehousing facilities, vehicles, and equipment to support our diverse

logistics and transportation activities. We work closely with suppliers, staffing agencies, and service providers across multiple countries to ensure efficient and reliable operations. We have engaged with our level one suppliers to begin addressing any suspected forced labour in their organizations.

Within North America, we operate in Montreal, Toronto and Vancouver, and service all of Canada with approximately 150 employees at the end of 2023.

Our approach

During this 2023-24 reporting year, we worked on assessing our current state of labour practises and those of the members of our supply chain. The findings from this data collection effort and analytics will inform our organizational policy making in the coming years. Below are the key areas in which we made organizational change.

Policies and Procedures

FB Canada Express has implemented the policies and procedures below to address forced and child labour risks:

- **Forced Labour Act – Internal Policy:** Aligns operations with the Forced Labour Act, ensuring compliance and guidance for staff and management alike.
- **Employee Code of Conduct:** Sets guidelines for ethical behaviour and compliance with labour laws for new and current employees.
- **Supplier Memo:** Informs suppliers of new company policies and compliance expectations. Attached to this memo is a supplier Labour Practises Questionnaire that is mandatory for suppliers to complete as part of their ongoing contractual relationship with.
- **Training and Awareness Circulars:** Educates employees on forced labour risks and company policies.
- **Reporting Email Hotline:** A place for whistleblowers to report any suspected labour law violations without fear of retaliation.

Risk Identification and Assessment

We have begun to identify key areas within our activities and supply chains that may carry a risk of forced or child labour, particularly in high-risk regions and industries involving low-wage labour and complex subcontracting chains. To address these risks, we have implemented the following steps:

- **Supply Chain Mapping:** Detailed mapping of the supply chain to identify and monitor all suppliers, focusing on those in high-risk areas.
- **Risk Assessment Analysis:** Conducting risk assessments to evaluate potential forced and child labour risks within operations and supply chains. This includes analyzing data from supplier self-reports and independent audits.

- **Supplier Engagement:** Requiring tier one suppliers to self-report on labour practices and compliance with anti-forced labour policies. This self-reporting is verified through audits and regular reviews.

In combination, these annual reports and survey responses will enable organizational transparency to help drive business decisions and close future risks of forced labour throughout our supply chain.

Working with Our Suppliers

In an effort to mitigate forced labour in our supply chain, we have taken a multi-pronged approach focused on close collaboration with our suppliers. We have implemented a comprehensive **Supplier Code of Conduct** that explicitly prohibits the use of forced or child labour, which all suppliers must contractually agree to uphold. New and previously-signed supplier agreements will now include this Supplier Code of Conduct for suppliers to review and agree upon.

Recognizing that eradicating forced labour requires sustained efforts, we will continue to closely engage our suppliers, monitor their performance rigorously, and drive continuous improvement across our entire supply chain through capacity building, remediation, and if necessary, commercial consequences for non-compliance.

Training and Awareness

We have provided training to leadership and managers, along with awareness resources for all staff. Informative flyers were shared with all employees, outlining new regulations and their implications. Additionally, we are developing comprehensive training programs for our leadership team to enforce these standards effectively as part of our 5-year Action Plan.

Action Plan

FB Canada Express is developing a comprehensive 5-year Action Plan. This plan includes a staged approach to FB Canada Express' commitment to Bill S-211. Measures of successful outcomes will be detailed and clear target set.

Conclusion

FB Canada Express is committed to preventing forced labour and child labour in our operations and supply chains. We will continue to identify and address any gaps in our response, ensuring that our business practices align with the highest ethical standards and comply with Bill S-211. Through these efforts, we aim to create a knowledgeable and vigilant workforce dedicated to upholding ethical standards and protecting human rights.

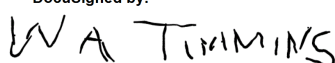
Steps taken across our business

FB Canada Express has made significant efforts to comply with Bill S-211 and address forced labour and child labour risks. Here are some of the key initiatives and actions taken:

1. Comprehensive Documentation and Policies
 - a. Implemented the **Forced Labour Act – Internal Policy** to align operations with the Forced Labour Act and ensure compliance.
 - b. Developed a detailed **Employee Code of Conduct** that sets guidelines for ethical behaviour and compliance with labour laws.
 - c. Issued a **Supplier Memo and Supplier Questionnaire** to inform suppliers of company policies and compliance expectations.
2. Risk Assessment and Supply Chain Mapping
 - a. Conducted a **Risk Assessment Analysis** to identify and prioritize potential forced labour risks.
 - b. Created a **Supply Chain Map** to outline the supply chain from raw materials to finished products, detailing client relationships.
3. Supplier Engagement and Monitoring
 - a. Required tier one suppliers to **self-report on labour practices** and compliance with anti-forced labour policies.
4. Training and Awareness Programs
 - a. Distributed informative flyers to all employees, outlining new regulations and their impacts on work at FB Canada Express.
5. Grievance Mechanisms
 - a. Established an **email hotline managed by HR**, allowing employees to report any concerns or violations related to forced labour and child labour without fear of retaliation.
 - b. Developed and implemented internal grievance mechanisms to address forced labour and child labour issues.
6. Action Plan Development
 - a. Developing a comprehensive 5-year action plan, expected to be completed by Q3 2024, which includes ambitious targets to mitigate forced labour in our supply chain.

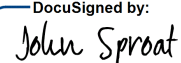
FB Canada Express is dedicated to continuous improvement and will keep refining its policies and procedures to ensure the highest standards of ethical labour practices. Through these efforts, we aim to create a knowledgeable and vigilant workforce dedicated to upholding ethical standards and protecting human rights.

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.

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I have the authority to bind F.B. On Board Courier Services Inc.

William Timmins
President
F.B. On Board Courier Services Inc.

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John Sproat
Chief Operating Officer
F.B. On Board Courier Services Inc.

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Nicholas Timmins
Chief Financial Officer
F.B. On Board Courier Services Inc.