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## To the Minister of Public Safety

### Report to comply with requirements set forth in Bill S-211

The following joint report is presented by Glasvan Trailers Inc. ("Glasvan Trailers") and its subsidiary, Glasvan Great Dane Sales Inc. ("Glasvan Sales") (collectively, "Glasvan", "we", "us", "our") in compliance with requirements outlined in Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("the Act") for the fiscal year ending October 31, 2023.

The report describes Glasvan's commitment to uphold honesty and integrity in its business operations and the measures that Glasvan has undertaken and plans to undertake to mitigate the risks of modern slavery within its activities and supply chains.

For the purposes of the Act, both Glasvan Trailers and Glasvan Sales meet the definition of "entity" by having a business in Canada, doing business in Canada, and meeting the threshold criteria for revenue and assets, and the definition of "reporting entity" by virtue of selling and distributing goods in Canada and outside of Canada, and of importing into Canada goods produced outside of Canada.

Glasvan is committed to respecting all human rights in accordance with applicable laws in Canada and elsewhere, and with the principles set forth in international standards, including the UN Declaration of Human Rights, the UN Rights of Indigenous Peoples, and UN Guiding Principles on Business and Human Rights.

### **Subsection 11(1) - Steps taken during the previous financial year to address risks of child and forced labour in activities and supply chains**

The Glasvan entities did not take any specific steps during the previous financial year ending in October 2023 to address the risks of child and forced labour in activities and supply chains. However, as the supplementary information provided below describes, the Entities have certain measures in place and is considering the introduction of future measures that will enhance our level of diligence regarding child and forced labour, in line with our commitment to ethical business practices and respecting all human rights.

### **Subsection 11(3) - Supplementary Information**

#### a. Structure, activities, and supply chains

Glasvan Trailers is an Ontario-based corporation focused on the distribution and sale of trailer parts and accessories, as well as trailer repair and maintenance services. The company has four



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strategically located service centres in Woodstock, Alliston, Whitby, and Mississauga, and is organized into various departments including finance and administration, parts operations, and service, employing a total of 78 people.

Glasvan Trailers also owns and controls Glasvan Sales, which focuses on the distribution and sale of new and used trailers, including but not limited to flatbeds, refrigerated units (reefers), tilt beds, and heavy haul detachables; as well as other vehicles such as vans, shunt tractors, and truck bodies. Glasvan Sales operates out of the same locations as Glasvan Trailers and employs a team of seven sales and service coordination representatives.

Our service centres collectively have 27 available service bays and a substantial parts warehousing space of 24,000 square feet. Each of our locations is an accredited Ministry of Transportation station, authorized to conduct annual safety inspections and certifications. Additionally, we specialize in extensive modification projects, liftgate installations, and the refurbishment of older equipment to extend its operational lifespan.

Glasvan has partnered with reputable vendors like Aurora Parts and Accessories to enhance our top-tier service with their extensive national network of parts distribution centers. This collaboration leverages their vast inventory, advanced technology solutions, and commitment to sustainable business practices.

The integrity of our supply chains is essential to our operations, covering all aspects from trailer and parts procurement to final product delivery. In the last fiscal year, Glasvan sourced approximately 90% of its trailers and 70% of its parts from the United States, with the remainder sourced locally from Canada.

## b. Policies and due diligence processes

### Internal

Glasvan adheres to all relevant provincial and federal labour laws and standards, including respecting the minimum employment age of 16 in Ontario, to ensure that there is no child labour or forced labour in any part of its service and sales operations. We also administer employment contracts to new hires, ensuring that our recruitment of employees is entirely voluntary. While Glasvan upholds ethical policies that all employees must agree to via a code of conduct attestation, which includes policies around workplace harassment and violence, specific acknowledgments of the risks associated with child and forced labour have not yet been integrated into this policy.

### Supply Chain



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Glasvan has focused on building strong relationships with its suppliers, external service partners and customers over time, which allow us to collaboratively address issues or challenges as they arise. Glasvan is firmly committed to upholding human rights and expects its suppliers and partners to do the same.

Glasvan procures most of its trailers and parts from strategic tier one suppliers based in the United States. While we have contracts in place with some of them, we do not currently have any specific clauses or policies in place that explicitly address the topic of child and forced labour. While we consider the risk of modern slavery in the operations of our key suppliers in the US to be low, we recognize that their suppliers (tier two and further removed) may be based in other countries or locations that may face higher risks. The preparation of this report has therefore motivated us to increase our level of diligence by engaging our key suppliers on this topic and collaborating with them to understand how to collectively address the risks of modern slavery in our shared supply chains.

#### Development of Due Diligence Processes

Recognizing the importance of ongoing due diligence to identify, prevent, and mitigate adverse impacts on human rights within our operations and supply chain, Glasvan is evaluating the potential introduction of a supplier code of conduct. This policy will be particularly critical for Glasvan's tier one suppliers that import goods from regions with a heightened risk of forced and child labour. The supplier code of conduct should explicitly outline our zero-tolerance stance towards any form of forced or child labour within our supply chains, establishing clear ethical expectations and requiring compliance with international labour standards. Formal acknowledgment of the code will be mandatory for all existing and future suppliers. Additionally, we may introduce a questionnaire for all current and new suppliers to complete to gather input and inform a deeper assessment of child and forced labour risks in our supply chains beyond the tier one level.

These forthcoming due diligence advancements are envisioned to align with the comprehensive framework provided by the OECD Due Diligence Guidance for Responsible Business Conduct. Our objective is to embed Responsible Business Conduct (RBC) into our policies and management systems, ensuring a proactive stance towards assessing and addressing potential adverse impacts in our activities and supply chains.

In the introduction of new measures, we will seek to engage with our key tier one suppliers to better understand their policies and practices, share learnings, and ensure alignment.

#### c. Forced labour and child labour risks



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As part of the process to prepare for these disclosures, and consistent with our commitment to uphold ethical practices, Glasvan Trailers and Glasvan Sales have conducted an initial risk assessment based on supplier location. The assessment process was guided by the insights provided by the Walk Free Global Slavery Index (GSI) and the US Department of Labour’s (USDL) List of Goods Produced by Child Labour or Forced Labour, which highlight potential modern slavery risks based on country and on the type of goods imported from certain countries. The goal of the assessment was to identify any existing “hot spots” where heightened risks might exist, thereby enabling us to implement effective preventative measures.

The Walk Free GSI and the USDL’s List of Goods Produced by Child Labour or Forced Labour were instrumental in assessing our exposure to risk. We acknowledge that no industry is entirely exempt from the risks of forced and child labour, and as a large distributor of complex manufactured goods, we recognize the inherent vulnerabilities in certain parts of our supply chain, particularly in regions where regulatory frameworks and enforcement mechanisms might not be robust. While we conducted this initial assessment at a tier one supplier level based on supplier location, our enhanced awareness of the issue has prompted us to think about our suppliers beyond tier one, and how to ensure that child and forced labour are not present at any stage of our supply chain.

#### Risk Assessment Findings

Through this analysis, Glasvan identified that no tier one suppliers pose a heightened risk of forced or child labour, given their location and type of good. Our entire procurement budget is allocated to countries with a lower estimated prevalence of child and forced labour, according to the Walk Free GSI, comprising goods and services from Canada and the United States.

Glasvan also reviewed the USDL’s List of Goods Produced by Child Labour or Forced Labour and determined that, based on data from tier one suppliers and the types of products imported, no products sourced from our tier one suppliers currently pose a risk of forced or child labour. However, this does not preclude the potential for higher risks related to the goods that our tier one suppliers import and incorporate into their products. Therefore, in 2024, we plan to engage with our key suppliers to gather further information on the country of origin of products and components to highlight potential areas of higher risk and collaborate on appropriate policies and practices required to manage it. This initiative would be reinforced with potential introduction of a supplier code of conduct, which would raise the level of transparency and accountability expected of all our tier one suppliers. Since many of Glasvan’s key suppliers are reputable OEMs, we expect that most of them have already introduced some measures to address the issue forced and child labour.



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#### d) Remediation measures

To date, Glasvan has not identified or faced any instances of forced or child labour in our operations or supply chains, so no remediation measures have been required. However, we are committed to working with any suppliers that may be impacted by any instances of child or forced labour in the future to determine the most appropriate remediation measures under the circumstances, in line with recommendations from the OECD and other relevant international organizations.

The identification of any instances of child or forced labour in our supply chain would also prompt a review of our policies and diligence to identify gaps and appropriate corrective measures, and a review or audit of the impacted tier one supplier to assist them in understanding their gaps and corrective measures.

#### e. Remediation of loss of income

Per section above, Glasvan has not identified or faced any instances of child or forced labour in our operations or supply chains to date, and therefore no measures have been required to remediate the loss of income to vulnerable families. We do however recognize the importance of being prepared to take immediate and effective action should any issues arise in the future. If we were to experience any reports or instances of child or forced labour, we would engage with the impacted suppliers to determine the most appropriate remediation measures, including loss of income remediation, in line with guidance from relevant international organizations and standards.

#### f. Training

Glasvan does not currently have in place any mandatory training on ethical sourcing and the identification of risks associated with forced and child labour. However, we are exploring options related to staff training, awareness building, and engagement with key employees concerning forced and child labour in our supply chain. We recognize this as a critical step in our ongoing commitment to addressing these issues. Options under consideration include targeted education for roles in contracting and purchasing, additional content in our onboarding materials to raise awareness in new recruits, and company-wide communications to emphasize our commitment to upholding human rights as part of our ethical business practices.

#### g. Assessing effectiveness

While Glasvan does not currently have a governance process in place to specifically assess our effectiveness in ensuring that forced labour and child labour are not being used in our activities



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and supply chains, we are committed to continuing to evolve our practices in coming years. As we consider the introduction of a supplier code of conduct and other measures to address risks, we will ensure that an appropriate governance process is in place to assess the effectiveness of our measures on a regular basis, at least yearly. A key component of a governance process would be the tracking of relevant indicators, which may include number employees trained on the topic, number of suppliers that have adopted our supplier code of conduct, number of suppliers that have responded to any questionnaires that we may send out, and number of audits conducted.

### Attestation

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 listed above, and that it has been approved by the governing body of the entity. 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.

Paul Cobham

President

Full name

Title

May 30, 2024

Signature

Date

I have the authority to bind Glasvan Trailers Inc. & Glasvan Great Dane Sales Inc.