

SUPPLY CHAIN TRANSPARENCY REPORT

Fighting Against Forced Labour and Child Labour in Supply Chains

Year 1 | January 1, 2023 – December 31, 2023

Accountable Signing Authority: Althea Mothersill



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Company Overview

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “**Supply Chain Transparency Act**”), this statement outlines the measures implemented or to be implemented by Legacy Supply Chain Services (“**Legacy**”) to address the risks of modern slavery, including but not limited to forced and child labour¹ within its operations and supply chain. This report is not a joint report as there is no entity which Legacy controls that is covered by the *Supply Chain Transparency Act*.

Legacy is committed to preventing any violation of individuals’ human rights through the policies and procedures it has established, including its Code of Business Ethics Policy (the “**Code of Ethics**”), which sets forth Legacy’ expectations that its staff and business partners abide by legal and ethical standards and comply with applicable laws, regulations, and contract terms. Legacy is committed to establishing safe, inclusive, and respectful work environments wherever it conducts business. Legacy values the fundamental rights of its employees and all who work within its supply chain, which encompasses freedom from slavery and child labour, equal opportunities for all, a safe and healthy workplace, and freedom from discrimination and harassment.

Legacy continues to develop and expand its understanding of the risks associated with the complex issue of modern slavery and to identify areas within its operations and broader supply chain that may be impacted by such challenges. Legacy intends to collaborate across its business and supply chain to implement appropriate practices that mitigate and address potential risks.

Modern slavery is completely unacceptable within Legacy’s organization and supply chains. Legacy acknowledges its responsibility to uphold the rights of individuals working for the organization, as well as those associated with suppliers and business partners who prioritize human rights for their own employees. Recognizing that human rights issues require multifaceted approaches, Legacy considers it crucial to engage with various stakeholders to promote awareness and foster understanding.

Part I – Structure, Operations and Supply Chains

Our Structure

Legacy operates across Canada and the United States. Founded almost 40 years ago, Legacy has grown as a pioneer, mid-sized third-party logistics (“**3PL**”) provider that businesses depend on to create control over their dynamic omni-channel supply chains. Legacy’s Canadian headquarters are located in Brampton, Ontario, while its American headquarters are located in Franklin, Indiana. As such, Legacy has no reporting obligation in other jurisdictions.

Legacy currently employs over 2,000 staff amongst the transportation operating locations in Canada and the United States. Legacy also has global assets of over \$20 million and/or has generated at least \$40 million in revenue.

¹ As these terms are defined pursuant to section 2 of the *Supply Chain Transparency Act*.

Legally, Legacy is classified as corporation. It was registered under the Ontario *Business Corporations Act*, was amalgamated on December 30, 2022 and has the Ontario Corporation Number 1000399652.

Our Operations

Legacy is a high-growth North American 3PL serving as a distribution, fulfillment, and transportation partner that drives control over dynamic, omni-channel supply chains. Legacy tailors warehousing & distribution solutions, eCommerce fulfillment, and international & domestic transportation services that allow its clients stay more connected to their customers. B2B and B2C businesses of all types can leverage Legacy's broad supply chain network that enables smart, sustainable, and scalable growth.

Our Supply Chains

Legacy's suppliers are primarily located in Canada or the United States. It often contracts with suppliers for the provision of certain staffing and management services. Legacy also contracts for products, mainly warehouse and office supplies, and computer hardware. Suppliers who provide these products are located largely in Canada or in the United States, but some suppliers may have offices located globally. Responsible sourcing across the company's integrated supply chain organization is vital to its business.

Legacy's core values include its commitment to cultivating a responsible enterprise and conducting business ethically, safely, sustainably, and fairly. All of Legacy's suppliers are expected to comply with these values and with its Code of Ethics.

Part II – Policies and Due Diligence Processes

Legacy has in place a robust set of rules and procedures addressing its obligations to treat its team members, clients and suppliers with the highest possible level of dignity and respect, as well as its expectations that its contractors and suppliers do the same. These documents include the following:

- Code of Ethics
- Internal Code of Conduct
- Canadian Health and Safety Policy
- Harassment, Discrimination and Workplace Violence Policy

Legacy also expects that its business partners have similar policies and procedures to ensure that all staff down the supply chain are being treated with respect and dignity.

Code of Ethics

Legacy is committed to conducting business in an ethical and legal manner. Legacy's directors, employees, agents, representatives, suppliers, independent contractors, and consultants are all expected to adopt Legacy's Code of Ethics and to conform accordingly.

The Code of Ethics sets out the principles that Legacy operates on. These principles apply in all areas where Legacy conducts business. Where there is a conflict with applicable laws, the Code of Ethics states that the most restrictive policy or law shall prevail.

The Code of Ethics touches on the following topics:

- Ethical business conduct
- Conflict of interest
- Compliance with laws and regulations
- Use of company assets
- Confidential and proprietary information
- Expense reporting
- Duty of loyalty
- Relations with government employees
- Illegal or improper payments
- Non-retaliation

Legacy is committed to ensuring that all employees down the supply chain feel comfortable reporting any wrongdoing or illegal conduct by other staff or business partners.

Internal Code of Conduct

Legacy's internal code of conduct is available to all employees to review online. It outlines the company's expectations that all employees protect the interests and safety of Legacy's staff and the organization as a whole. Intolerable conduct includes failing to report unsafe conditions and acting in a way that would injure or endanger others. In conjunction with the company's Harassment, Discrimination and Workplace Violence Policy, Legacy ensures that all employees are adhering to and being treated in accordance with the Ontario *Human Rights Code* through orientations, policy refreshers and retraining as needed.

Supplier Contracts

Legacy's supplier contracts incorporate requirements that suppliers abide by employment standards minimums. For instance, the contracts explicitly state that no staff shall work more than forty four (44) hours unless written authorization for overtime is obtained. Further, Legacy sets the wage rates for the staff provided, which are over and above applicable minimum wages.

Auditing and Enforcement

The Code of Ethics allows for discipline where Legacy finds that an individual or entity has violated its policies, rules or regulations, or ethical principles. Should such a violation be discovered, the appropriate party could be subject to corrective disciplinary action, up to and including termination. If Legacy discovers that a supplier or subcontractor has violated the Code of Ethics, Legacy will contact them to ensure that disciplinary action is taken on their end.

Legacy has also conducted audits of its suppliers to ensure that all staff have valid worker permits and proper identification. In this way, Legacy can ensure that all its employees are of age and have the proper licenses to legally work in Canada.

Reporting Process

Legacy has an Ethics Hotline at (888) 578-7902, which employees or other parties can contact if they suspect that a violation of the Code of Ethics has occurred. This hotline is available 24/7. All claims and calls are investigated by the company.

An individual may also contact the Vice-President of Human Resources regarding any violations.

Our Due Diligence Processes

Legacy recognizes that due diligence is a process to identify and respond to the real and potential adverse impacts of activities throughout the supply chain. Prior to signing suppliers, Legacy ensures that it conducts a thorough search of the potential partner's history, including any possibility of using human trafficking, slavery, and corruption. Legacy also vets all business partners, clients, agents and vendors for environmental performance, trade controls, labour practices and human rights practices.

Legacy has implemented a number of due diligence measures to ensure layers of review. As described above, Legacy requires that all its suppliers review the Code of Conduct and other applicable policies and procedures.

Legacy is committed to healthy, safe, and respectful working conditions throughout its supply chain. Forced labour and child labour are anathema to Legacy's core values, which is why it has strong due diligence practices in place.

Part III – Risks of Forced Labour and Child Labour in Operations and Supply Chains

Through the Code of Ethics, Legacy expects all suppliers, regardless of the cultural, social and economic context, to meet expectations of fundamental rights for all people. This means treating their employees with fairness, respect and dignity, and following practices that protect health and safety for the people working for them.

Legacy believes there is minimal risk of forced labour or child labour in its supply chain. Legacy is not aware of any forced labour or child labour in its supply chain. Both statements are subject to the limitations of Legacy's risk identification activities as described in more detail above and below.

Part IV – Measures to Remedy Forced Labour and Child Labour

Legacy is not aware of any incidents of forced labour or child labour in its activities or supply chain in its past financial year, subject to the limitations of its risk identification activities as described in more detail above and below.

Nevertheless, if any incidents arise, Legacy will hold all individuals and entities accountable.

Part V – Measures to Remediate the Loss of Income to those Impacted by the Elimination of Forced Labour and Child Labour

Legacy recognizes that efforts to prevent and reduce the risk of forced labour and child labour (as set out at Part IV) can have the unintended consequence of contributing to a loss of income for vulnerable families.

Legacy has not, as of the date of this report, become aware of any loss of income to vulnerable families resulting from its measures to eliminate the use of forced labour and child labour in its activities and supply chains. Should such a risk materialize, Legacy remains committed to preventing and reducing the impact that forced and child labour can have on a vulnerable family.

Part VI – Training Provided to Employees

The company does not provide training to employees on the risks of forced labour and child labour in supply chains. The company does, however, provide training on ethical conduct and human rights in the workplace.

Legacy is committed to educating its employees on the new legislation, and the company's obligations with respect to the same. The company is considering implementing further training to ensure that this commitment is actualized.

Part VII – Assessing Effectiveness of Actions against Forced Labour and Child Labour

Legacy has taken actions to assess the effectiveness in preventing and reducing risks of forced labour and child labour in its activities and supply chains in the previous financial year by requiring its suppliers to abide by its Code of Ethics and conducting audits of its suppliers' staff to ensure that proper identification and related documents are in order.

Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains 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.

By signing the below, I hereby confirm I have the authority to bind Legacy Supply Chain Services.



Althea Mothersill
Vice President of Finance

May 27, 2024

Date