

STRUCTURE

- **Legal name:** Light Speed Logistics Inc.
- **DBA:** Light Speed Logistics Inc.
- **Headquarters:** 122 Carmek Boulevard, Rocky View County, Alberta, T1X 1X1
- **Website:** www.lslinc.com
- **Phone:** 1-800-397-6009
- **Legal structure, including legal classification:** Corporation
- **Founded:** 2000
- **Organizational structure:** Multi-departments. Departments reporting to CEO: Dispatch; Safety; Recruiting; HR; Payroll; ESG & MarComms. Departments reporting to CFO: AP & AR; Claims. Department reporting to CSO: Sales. Department reporting to VP Asset Management: Maintenance.
- **Organizational mandate or role:** Light Speed Logistics is a Canadian-based for-hire carrier, providing FTL reefer dedicated transportation service catering to the perishable food industry across Canada and the USA.
- **Number of employees, both in Canada and outside Canada:** All employees are located in Canada. 450+. Employee number fluctuates per month due to driver-employee in-flow (recruitment) and out-flow (retention vs attrition).
- **Partner organizations, or membership in a group:** n/a
- **Control of other entities, including what the controlled entities do and where they are located:** n/a

ACTIVITIES

Light Speed Logistics operates in the sector of transportation and logistics.

ABOUT THE COMPANY

Light Speed Logistics Inc. (Light Speed) is a leader in the cold chain transportation industry, specializing in the highly regulated, time-sensitive perishable food sector.

Light Speed is a Canadian-based company that offers trucking, shipping, hauling, freight and logistics services to move cargo to its destination on-time and on-budget. Shipping to and from all 48 states in the US and coast to coast in Canada, Light Speed Logistics lives up to its name boasting an industry best electronically verifiable on-time delivery record. With one of the largest “team drivers” driven fleets, Light Speed provides expedited services across both Canada and the USA boasting a 48-hour delivery-time anywhere in North America.

Light Speed prioritizes corporate social responsibility and environmental sustainability as demonstrated by industry best-practice standards, voluntary partnerships and certifications: CTPAT/PIP, TRACE, CSA, FAST, WCB COR, WSIB, SmartWay, DRC, and others.

Light Speed holds Elite Carrier Status (2022) with Northbridge Insurance. Light Speed was named as the Western Regional Winner for the 2022 Northbridge Insurance Transportation Safety Award. Light Speed is continually ranked a Top 100 Carrier through Today’s Trucking, since 2018. Light Speed is continually named a Top Fleet Employer by Trucking HR Canada, since 2022. In 2023, Light Speed was inaugurally named one of Canada’s Best Managed Companies, by Deloitte Canada.

NICHE SERVICE

Specializing in the highly regulated, time-sensitive perishable food sector, Light Speed understands food product transportation, and the regulations and temperature integrity around it. Light Speed is an expert in cold chain and reefer dedicated services. Light Speed's specialty is transporting temperature sensitive freight, with primary transport focus on fresh and frozen meats, produce and ice cream.

Reefer services:

- Temperature controlled.
- Frozen and fresh product delivery.
- Entire fleet is reefer-dedicated.
- Specific temperatures per client/shipper.
- Capability to maintain temperature requirements, to the exact degree.
- Capacity to hold clients' refrigerated product overnight, over weekends and during holidays.

Services Scope

- 24/7, 365 days per year
- Full truckload (FTL/TL)
- Tri-axle trailers (intra-Canada freight)
- Cold chain (reefers)
- Dry vans
- Multi-stop & multi-drop
- Expedited team service
- Dedicated transport
- Over-the-road (OTR)
- HAZMAT

SUPPLY CHAIN

Light Speed provides an operations scope including long haul, cross-border, expedited, Canada-wide, and local/city-specific. Light Speed only hauls full truckload (FTL), and does not provide Less Than Truckload (LTL).

Light Speed picks-up (PU) freight at shippers. Trailers are either pre-loaded and pre-sealed by the shipper upon PU, or trailers are live-loaded by the shipper, then sealed. All cross-border trailers are secured with ISO certified bolt seals per CTPAT/PIP standards. Shippers are located throughout USA and Canada. Examples of shippers and receivers include recognized companies such as (examples) JBS, Cargill, Tyson, McCain, Danone, Costco, Sobeys, Loblaws, Sofina, Sysco, ATS and FedEx.

Mapping Supply Chains: Summary

- Light Speed maps all supply chain touch points, including shippers (pick-ups), receivers (deliveries), portals of entry (USA and Canada customs), meat inspection facilities, rest stops, truck stops, fuelling stations, maintenance appointments, and yard activity.
- All supply chain touch points (noted above) are tracked in real-time, and geo-fenced in TMW software, via Orbcomm, Omnitracs and CoPilot technologies.
- Omnitracs 1 is installed on all trucks enabling continued accurate live-location updates on all freight data, including automated arrival/departures and geo-fenced driven real-time customer

updates. Omnitracs delivers dynamic end-to-end route navigation that is intelligent to ever-changing route variables such as construction, road closures, weather patterns, etc. Fundamentally, the system captures and delivers real-time alerts to dispatch and drivers when route-deviation occurs.

- Omnitracs is installed on all trailers enabling continued accurate live-location updates on all freight data, including automated arrival/departures.
- For the last 10+ years, Light Speed has invested in Electronic Data Interchange (EDI) technology to transfer live TMW freight information (arrival, transit and delivery metrics) to client-end real-time supply chain visibility platforms used by some of Light Speed's largest clients, e.g. FourKites (JBS, Cargill), e.g. MacroPoint (Sobeys, Tim Hortons), e.g. Trimble Visibility (Sysco, Tyson).

Mapping Supply Chains: Geo-Fencing

The geo-fence policy and procedure is set to:

- Geo-fences are set for every pick-up, every delivery location, every border crossing and any other major points, in the TMW database.
- Latitude and longitude tolerances are set to three (3) seconds.
- The TMW system auto generates arrival and departure alarms for each geo-fence exit/entry action.
- TMW geo-tags conveyance during the lifespan of the trip.
- Trip lifespan geographic routes are indefinitely saved in the TMW Operations archives. This enables capacity for any required investigations or retro-based investigations in order to verify data and/or comply with necessary law enforcement and border services authorities.

Mapping Supply Chains: Driver E-Logs

Drivers utilize e-logs and record all activity, including:

- Pre-Trip Inspection
- Departure
- Stops
- Any en-route inspections
- Seal verifications
- Border crossings
- Any meat inspection stops
- Delivery

As per regulations, logs are stored for six (6) months.

POLICIES AND ITS DUE DILIGENCE PROCESSES

Since 2021, Light Speed maintains policy clearly articulating the company's position to prevent forced labour, child labour, modern slavery and human trafficking. These policies are embedded into official company internal-communications and posted on the company's internal websites. These policies are also included in new-employee onboarding packages. These policies are signed and backed by company ownership and senior management.

Light Speed complies to client standards, questionnaires, surveys and reports relating to preventing forced labour, child labour, modern slavery and human trafficking.

- **Embedding responsible business conduct (RBC) into policies and management systems:** Light Speed implements RBC through a holistic and comprehensive Environmental, Social and Governance (ESG) approach. Light Speed volunteers for industry-best private-public partnerships to sustain reputable policy and procedure standards in addition to enrolling in best practices award programs, spanning: Supply chain security (CTPAT/PIP); occupational health and safety (COR); environmental (SmartWay); and social (Top Fleet Employer, Best Managed Companies).
- **Identifying and assessing adverse impacts in operations, supply chains and business relationships:** Light Speed acknowledges that any version of forced labour has negative impacts on supply chain integrity. Forced labour not only negatively impacts the person involved, but also impacts the client's shipment of goods and thus the general consumer. Policy indicates that the company is responsible for continually identify, assessing and mitigating counter RBC activities.
- **Ceasing, preventing or mitigating adverse impacts:**
 - Light Speed maintains partnerships with US Customs and Border Protection's CTPAT program, since 2007. The company conducts annual security audits for CTPAT through rotating online security reviews and onsite audits with USA customs officials. More: <https://www.cbp.gov/border-security/ports-entry/cargo-security/CTPAT>
 - Light Speed maintains partnerships with the Canada Border Services Agency's PIP program, since 2007. The company conducts annual security audits for PIP through rotating online security reviews and onsite audits with Canadian customs officials. More: <https://www.cbsa-asfc.gc.ca/services/security-secureite/business-affaires/ttp-pndc/pip-pep/menu-eng.html>
 - Since mid-2021, Light Speed has partnered with Trucking HR Canada (THRC) in order to align with industry human resources best-practices. More: <https://truckinghr.com/>
 - Light Speed has entered the coveted Top Fleet Employer (TFE) award community through a rigorous THRC application. Light Speed inaugurally received the TFE award in 2022 and since then has sustained the award annually (2022, 2023, and 2024). More: <https://truckinghr.com/top-fleet-employers/>
 - Since late-2023, Light Speed has partnered with Truckers Against Trafficking (TAT) in order to increase efforts on this ESG initiative. Light Speed is aligned with TAT's mission, "TAT stands committed to educated, equip, empower and mobilize members of key industries and agencies to combat human trafficking." More: <https://tatnonprofit.org/> and <https://education.truckersagainstrafficking.org/>
- **Tracking implementation and results:**
 - Light Speed conducts annual security reviews and annual program audits to satisfy CPTAT/PIP policy and procedure standards.

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- Light Speed annually reports to Trucking HR Canada's Top Fleet Employer Program on company HR policies, procedures and programs by providing data and documentation.
 - Light Speed provides training results/data to TAT per business quarter.
- **Communicating how impacts are addressed:** Light Speed communicates implementations and results through a blend of reports to management and ownership; companywide memos and meetings; and updating necessary stakeholders.
- **Providing for or cooperating in remediation when appropriate:** Light Speed collaborates, cooperates and works with all levels of government as required to maintain the highest standards of employment law, as the primary method to counter forced and child labour.

FORCED LABOUR AND CHILD LABOUR RISKS

Risks in the trucking industry are varied. Light Speed has identified several risk areas and risk types, relating to potential forced labour.

RISK AREA	RISK TYPE	LIGHT SPEED'S MITIGATION/PREVENTION	2023 MITIGATION IMPLEMENTATION
Employee recruiting and onboarding	1) Taking bribes for hiring. 2) Coercing the acceptance of a job. 3) Hiring persons with incorrect qualifications and competencies. 4) Pressure tactics to sign contract, especially without candidate's understanding of contract.	1) Anti-bribery policy. 2) Employment contracts. 3) Job requirements. Hiring process. 4) Prospective employees (candidates) are given multiple opportunities to receive detailed interpretation of contracts, and provided opportunity for contracts to be reviewed by 3rd parties, and allowed to review contracts outside of the employer's facility in order to ensure that the prospective employee does not feel "pressured" to "sign on the spot".	1) Yes & ongoing 2) Yes & ongoing 3) Yes & ongoing 4) Yes & ongoing
Temporary Foreign Worker (TFW) program	1) Miss-utilization of TFW program. 2) Taking bribes. 3) Pressure tactics to sign contract, especially without candidate's understanding of contract.	1) Partnered with law firm to guide entire TFW program. 1-2) *'Employee Referral Policy'. This Policy is aligned to Immigration and Refugee Protection Regulations. * Any person referring a TFW is investigated and required to sign on the referral policy that clearly outlines consequences for charging any sort of fees to the prospective TFW being referred. * Prospective TFW employee (candidate) is thoroughly educated on TFW rights and responsibilities, and on ramifications/consequences for paying any sort of fee(s) to consultants, 3 rd party recruiters, etc. * In order to keep the program simple and to avoid any confusion, Light Speed's TFW program is a 'fully employer funded program' in accordance with best practices well beyond baseline regulations and laws.	1) Yes & ongoing 2) Yes & ongoing 3) Yes & ongoing

		<ul style="list-style-type: none">* Employer pays for travel to/from home country.* Employer pays for all associated 'work permit' related and 'provincial nomination program' related fees.* Employer pays for all TFW associated legal fees.* Employer pays for all training, pre- and post-employment.* Employer provides hourly wages to a minimum of 30hrs per week, and paid from the 'date of landing' (into Canada) to/including the date of start-of-employment. (Licensing, proper certifications, and overall paperwork can take months of processing time).* Light Speed undergoes a voluntary, internal TFW program integrity inspection, conducted by an independent, external, certified HR consultant. The audit, in its entirety with all findings, is shared with Service Canada, TFW Program.* Light Speed successfully has undergone two external, government-led (Service Canada) integrity audits, and received commendation letters per audit for best practices observed and recorded.* Light Speed is in the process of obtaining (renewing) 'Preferred Employer Status' through Service Canada's TFW program.* Light Speed's TFW program currently provides LMIA's for 3yr contracts versus industry standard of 6 months. This is due to the 'Preferred Employer Status' achievement. <p>3) Prospective employees (candidates) are given multiple opportunities to receive detailed interpretation of contracts, and provided opportunity for contracts to be reviewed by 3rd parties, and</p>	
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		allowed to review contracts outside of the employer's facility in order to ensure that the prospective employee does not feel "pressured" to "sign on the spot".	
Driver training:	Forcing drivers to train and/or re-train without providing minimum wage.	*Paid training for all employees. *Visible remuneration process via multiple department fact checking.	Yes & Ongoing
Driver Mentorship Program (DMP)	Mentee forced by Mentor to work beyond maximum hours per day, and/or beyond maximum mileage per day.	*DMP Standard Operation Procedure. *Daily oversight of DMP by Safety & Compliance Department. *DMP evaluation forms on Mentor performance submitted by Mentee. *Mentee's truck tracked 24/7 by geo-tagged telematics and observable 24/7 by cab-mounted AI capable cameras.	Yes & Ongoing
Driver compensation:	Coercing drivers to utilize "Driver Inc." model.	*Drivers have option to onboard as Company Employee (CD) or Owner-Operator (O/O). O/Os must own their own equipment (tractor) and sustain worker compensation certificates. *Both CD and O/O sign contracts. * Light Speed is a strong supporter and founding member of 'Driver Inc.'/'employee miss-classification' committees at provincial levels (Alberta Motor Transport Association) and national levels (Canadian Trucking Association).	Yes & Ongoing
Driver tasks	Coercing drivers to complete tasks outside of job role, such as swamping (loading, unloaded freight in trailers), etc.	Job descriptions for drivers. Available publically on Indeed and company website. Employee Contract contains specific job tasks.	Yes & Ongoing
Other labour related risks:	Coercing drivers 1) to break compliance with Canadian and USA Hours of	1) Implementation of ELOGs prior to Canadian regulations released. 2) 'OHS rights' education during onboarding for all employees. OHS manual. COR certified company.	Yes & Ongoing

	<p>Service (HOS) through E-Log violations, not taking legally mandated HOS breaks, driving too many hours in one day, etc. 2) Ignoring drivers request to 'refuse dangerous work' when the driver is not trained and/or prepared for hazardous situations.</p>		
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Child labour risk has NOT been identified throughout Light Speed's operations.

Further mitigations are below:

Light Speed implements rigorous screening and compliance for recruiting and onboarding new employees:

- Employee Screening:
 - An interview in person and/or over the phone.
 - An application process based on ten years of verifiable working history along with references.
 - Reference checks are conducted to ensure accuracy. Any discrepancies are documented and discussed with potential employees in order to make judgement to further consider the application.
 - A criminal record check current within 12 months.
 - A complete driver's abstract current within 90 days (drivers only)
 - A drug and alcohol test at a facility designated by the company (drivers only)
 - On-going drug testing is conducted based on a random selection of drivers.
 - Periodic criminal record checks will be conducted based on cause, and or sensitivity of employee's position.
- New employees sign contracts, and are provided a copy for records.
- New employees receive onboarding package including contract, policies (violence/harassment policy, OH& policy, IT policy, Anti Forced Labour and Anti Human Trafficking Policy, etc.), health insurance information and Formal Hazards Assessment related to the specific job role.
- New employees must complete online training modules, i.e. Carriers Edge, prior to commencing employment duties.

Light Speed implements rigorous screening and compliance for recruiting and onboarding new employees through the Temporary Foreign Worker (TFW) program:

- Light Speed is committed to the protection from financial and other types of abuse of all employees, including its temporary foreign workers.
- The company provides the Temporary Foreign Worker 'rights pamphlet' to all TFW candidates and employees: https://www.canada.ca/content/dam/esdc-edsc/documents/services/foreign-workers/protected-rights/4337-TFWs-pamphlet_layout-EN.pdf
- The company provides TFW employees an 'Employee Referral Policy' relating to the TFW program. Highlights of the policy include:
 - "Under the provisions of the *Immigration and Refugee Protection Regulations*, it is illegal for an employer or a referring employee to collect "referral fees" or "recruitment fees" directly from a foreign worker. This illegal practice is strictly prohibited at Light Speed. **ANY LIGHT SPEED EMPLOYEE OR CONTRACTOR FOUND TO HAVE REQUESTED OR COLLECTED AN ILLEGAL RECRUITMENT OR REFERRAL FEE FROM A TEMPORARY FOREIGN WORKER, DIRECTLY OR INDIRECTLY, WILL BE IMMEDIATELY TERMINATED FOR CAUSE."**
 - "No Light Speed employee or intermediary is authorized to collect any fees from a foreign worker to process their application to come to Canada, except as specifically authorized in writing by Light Speed. If an employee or agent of Light Speed has asked you to pay a "referral fee" or "recruitment fee" for a recommendation to work at Light Speed, you should not pay and you should immediately report this request to Light Speed. Sometimes the employee may ask you to pay a family member, associate, or a fake "immigration professional" instead in exchange for a referral. This practice is also prohibited."
 - "If you are a foreign worker, you should notify Light Speed if you are using an immigration lawyer or consultant to process your immigration application. This allows Light Speed to advise you whether payment to these representatives is legitimate. A foreign worker may have to pay an immigration consultant or lawyer directly for their immigration application from time to time, including legitimate disbursements such as Canadian government application fees."

Light Speed deploys contracts for all employees and hired persons:

- All employee drivers, owner-operators, office and shop employees, contractors, vendors sign employment agreements or contracts. These agreements benefit both parties, and prevent forced labour due to stipulating job roles, compensation type, etc.
- Employees in the TFW program receive additional policy and contracts to provide protection against possibility of forced labour.
- New drivers enrolled in the Driver Mentorship Program receive a specific mentee contract to provide protection against possibility of forced labour.
- All vendors and contracts must provide proof of disability insurance to guarantee OH&S standards.

Per CTPAT/PIP policy, Light Speed implements thorough 'Positive ID Systems' for employees and contractors:

- Issuance of identification badges and key cards is controlled by no more than two members of senior management. Human Resources is responsible for issuing and administering ID card creation and monitoring.

- All employees are issued photo IDs upon hiring. Photo IDs are printed on the access key card itself. Identification includes a photograph of the employee, company logo, an employee number and a color coded horizontal-bar highlighting the general/global department and general access level.
- Contractors working on a continual basis, are provided a contractor access card.
- All office employees are very familiar with each other. This stems from each new employee being introduced to existing personnel in all departments, being provided a building/facility tour, and receiving extensive training with a designated company “mentor”. Any unrecognized/unauthorized presence is to be challenged. To emphasize, all dispatchers are communicated regular employee/driver lists via email with full names and employee IDs, and truck number assigned to specific drivers.
- All terminated employees are de-activated immediately across all systems including building badge access, email account and company online accounts.
- Removal of employee badges is part of the termination procedures.
- Any unreturned, inactive, or missing key cards (FOBs) are deactivated immediately.
- All dispatchers are communicated via regular employee/driver lists via email encompassing full names and employee IDs, and truck number assigned to specific drivers.
- Visitors, service providers, government officials, and vendors are required to sign in and wear a temporary visitor badge (identification) while on premises. Specifically, the visitor’s ID is provided on a lanyard for maximized visibility. The ID is for visual identification purposes and the ID does not enable access to any parts of the facility. All visitors and vendors are to return identification badges upon signing out.

Per CTPAT/PIP policy, Light Speed implements thorough policy and procedure for employees resigning/terminated:

- Access devices include employee identification badges, visitor and vendor temporary badges, biometric identification systems, proximity key cards, codes, and keys.
- Upon an employee separating from the company, e.g. resignation, termination, their access card is immediately deactivated. The employee is required to return the physical access card to the company as per the signed ‘access card agreement’. Failure to return the physical card equates to the employee being deducted a financial penalty from their last pay cheque. This policy motivates the employee to return the physical card.
- When employees are separated from the company, the use of comprehensive exit checklists help ensure that all access devices have been returned and/or deactivated, and that all software and email accesses have been terminated/closed.

Per CTPAT/PIP policy, Light Speed restricts access and sensitive areas:

- Separate access zones have been created based on department roles and employee roles within the company. Employees within a particular role can only access areas pertaining to their role.
- Employees and contractors are only provided access to their area(s) of responsibility.
- Access to secure areas specific to the performance of duties for employee groups is controlled via zone controlled key card access. A color-coded border on the photo ID highlight the department and access level.

Per CTPAT/PIP policy, Light Speed tracks all driver activities:

- All trucks and trailers (assets) are GPS tracked, in real-time, via satellite technology.
- Specific departments (Dispatch, Safety, Human Resources) have access to tracking assets to determine driver's location and work activities.
- All trucks (company drivers and owner-operators) are equipped with Lytx cameras, road facing and internally cab facing. Only the Safety Department has access to Lytx software technology. Lytx enables Safety employees to view the truck's internal cab in real-time, 24/7. Lytx is equipped with AI technology, and sends real-time alerts to the Safety Department based on specific behavior movements.
- Lytx: In 2022, Light Speed re-invested in every company commercial vehicle (including owner/operators) and retrofitted the fleet with advanced AI capable Lytx sf300 model units to produce a higher quality driver behavior recognition program to further track, measure and improve driver safety. Lytx AI tech tracks driver fatigue through pupil recognition, ergonomics through shoulder/neck behavior, and distraction through phone-light recognition, as examples. All video feeds are live and geo-based.
- All trucks are equipped with ELOG installed hardware. Each driver has a unique ID requiring ELOG compliance. ELOG compliance enables the company to track on-duty and off-duty segments per trip.
- All drivers are required, per company policy, to conduct pre-trip inspections and post-trip inspections, to assess for maintenance requirements, road-ready status, reefer integrity and signs of tampering (theft, smuggling, illegal activity, etc).
- When assets arrive at the main terminal for maintenance and sanitization, the shop conducts CTPAT/PIP inspections on each truck and trailer. These inspections are conducted on internal and external components of each truck and trailer, investigating for hidden compartments that would serve to transport illegal goods and/or to support human trafficking.
- All drivers must conduct third-party drug and alcohol screening quarterly, i.e. per business quarter.
- All contracted carriers are vetted, screened and monitored through RMIS (TruckStop). RMIS is one of the industry's leading monitoring registries conducting compliance assessments for transportation carriers. Light Speed rolled out the RMIS onboarding system upgrade in 2020 through implementing a streamlined SaaS overhaul.

REMEDIATION MEASURES

Light Speed has not identified any acts of forced nor child labour across its business operations or supply chain. To this end, no measures have taken by the company to remediate forced labour or child labour in its activities and supply chains.

REMEDIATION OF LOSS OF INCOME

n/a

TRAINING

Light Speed is committed to educating its employees on how to identify, report, prevent and reduce forced labour, child labour, modern slavery and human trafficking.

Light Speed has deployed an online training tool (CarriersEdge) that provides interactive, online training that new employees must complete before starting their respective job role.

All new employees onboarding at Light Speed are required to complete multiple training modules on Carriers Edge. One of these training modules includes “Truckers Against Trafficking (TAT).

- Training is mandatory.
- Training is entity-wide.
- All groups/levels of employees receive the training.
- The content of the training covers human trafficking, modern slavery.
- The training was developed by an external organization, i.e. Truckers Against Trafficking.
- The length of the TAT training is 27 minutes.
- Mode of training assessment is a multiple choice.
- Since January 2024, employees have received the training and all employees onboarded prior to 2024 will receive the training throughout 2024.

Employee undergo annual re-fresher training (internally delivered) for supply chain security, in alignment with CTPAT/PIP policy and procedures.

ASSESSING EFFECTIVENESS

Light Speed maintains an annual evaluation and action plan, assessing holistic ESG activities. This includes Anti Forced Labour, Anti Human Trafficking, and Anti Child Labour.

The evaluation report maps potential risks; level of risk severity; controls/remediation efforts; remediation scoring; identified and responsible stakeholders; recommended actions; and timetables.

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 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 purpose of the Act, for the year listed above.

Truly,



Ashish Gill
CEO

Date: May 30th, 2024