



PSA CANADA VENTURES LIMITED

**PSA HALIFAX LIMITED PARTNERSHIP
PSA HALIFAX FAIRVIEW COVE INC**

MODERN SLAVERY ACT REPORT

FISCAL YEAR 2023

Issued date: May 28th 2024

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1. About this report

This report has been prepared pursuant to the *Canadian Fighting against Forced Labour and Child Labour in the Supply Chains Act* (the “Act”) and sets out the measures taken by PSA Canada Ventures Limited and its subsidiaries PSA Halifax Limited Partnership (“**PSA Halifax Atlantic Hub**”) and PSA Halifax Fairview Cove Inc. (“**PSA Halifax Fairview Cove**”) during fiscal year January 1, 2023 to December 31, 2023 to prevent and reduce the risk of forced labour or child labour in its operations and supply chain. Collectively, PSA Canada Ventures Limited, PSA Halifax Atlantic Hub and PSA Halifax Fairview Cove hereinafter referred to as the “Company”, “we” or “us”. When used in this report, the terms “forced labour” and “child labour” have the respective meanings ascribed to them by the Act.

This report is prepared by the Company for the reporting period January 1, 2023 to December 31, 2023. The Company is a key player in the transportation industry, with PSA Halifax Atlantic Hub and PSA Halifax Fairview Cove specifically operating as a container terminal in Halifax, Nova Scotia. This report outlines our commitment to ethical business practices and our compliance with the Act, showcasing our ongoing efforts to prevent and combat forced and child labour within our organization and its supply chains.

2. Steps to prevent and reduce risks of forced labour and child labour

Throughout the reporting period, we have remained committed to ethical business practices and the prevention of forced labour and child labour within our operations and supply chains. We reinforce this commitment by including anti-slavery clauses in all supplier contracts and maintaining comprehensive policies and procedures which are described in more detail below. Our standard anti-slavery clause requires that the supplier and any of its sub-contractors do not employ forced or child labour. Accordingly, not only is it expected that our suppliers uphold similar values and business practices as we do, but it is also required under our Supplier Code of Conduct. These measures reflect our ongoing dedication to promoting a responsible and ethical business environment.

3. Structure, activities and supply chains

PSA Canada Ventures Limited is an Ontario corporation which controls both PSA Halifax Atlantic Hub and PSA Halifax Fairview Cove. PSA Halifax Atlantic Hub and PSA Halifax Fairview Cove operate primarily as container terminals, facilitating the movement of goods through container handling services. PSA Halifax is an Ontario limited partnership, and its general partner is PSA Halifax Limited. PSA Halifax Fairview Cove is an Ontario corporation.

We provide end-to-end connections from Asia, Europe and the Caribbean to the major cities in Eastern Canada, the US Midwest as well as short-sea coastal destinations. Due to natural deepwater and year-round ice-free access, our port is capable of handling the largest vessels visiting North America’s east coast. As a global hub, our two terminals offer value-added services along with efficient and flexible routing options for cargo interests.

While we do not engage in the production or sale of goods, PSA Halifax Atlantic Hub and PSA Halifax Fairview Cove import equipment essential for our operations from key manufacturing hubs such as China, Europe, and the USA. This equipment includes machinery, technology, and infrastructure necessary for efficient terminal operations.

4. Policies and due diligence processes

We seek to ensure that every business interaction and activity reflects and reinforces our commitment to the highest standards of excellence and are guided by our Code of Business Ethics and Conduct. We have established a variety of relevant policies that address forced or child labour in our business activities and supply chains:

- **Supplier Code of Conduct:** it states how business should be conducted and sets out guidance on the standards of behaviour expected of all of our suppliers, vendors, contractors, manufacturers, service providers, and business partners, along with their subsidiaries, affiliates, sub-contractors, sub-suppliers, agents and recruitment agencies (collectively, “**Supplier**” or “**Suppliers**”). At a minimum, we require that all Suppliers meet the standards set out within the Supplier Code of Conduct. Suppliers are required to comply with applicable laws and rules of authorities governing them, act in accordance with the highest standards of ethical, personal, and professional conduct. According to the Supplier Code of Conduct, Suppliers should ensure they have appropriate processes in place for their employees to report concerns which they may have surrounding breaches of laws or inappropriate behavior. The Supplier Code of Conduct is publicly available: [PSA-Supplier-Code-Of-Conduct-V1.pdf \(globalpsa.com\)](#)
- **Anti-Slavery Clause:** we include a standard clause in all our supplier contracts that prohibits the supplier and each of its officers, employees, affiliates, agents, representatives, subcontractors and their respective officers and employees from employing any forced or child labour.
- **Code of Business Ethics and Conduct:** further establishes our commitment to conducting business with the highest standards of ethics and integrity, with accountability to our customers, our people and the unions that represent them, our partners, governments, the local communities and the environment. Included within the Code of Business Ethics and Conduct is a three-step checklist as a guide to collecting relevant information in order to decide upon the ethical course of action in business situations. Further, the Code of Business Ethics and Conduct upholds our respect for human rights as it prohibits all forms of discrimination and reinforces our commitment to taking all allegations seriously. We recognize that health and safety are critical business issues that require regular reporting, appraisals, and improvements. We do not tolerate any verbal or physical behaviour that may lead to or cause workplace violence. Also embedded within the Code of Business Ethics and Conduct is our Whistle Blower policy, described in more detail below. The Code of Business Ethics and Conduct is publicly available: <https://www.globalpsa.com/wp-content/uploads/PSA-The-Code-Handbook-2023-Q1.pdf>.
- **Whistle Blower Policy:** as part of our commitment to uncompromising integrity, we established our Whistle Blower Policy. The Whistle Blower Policy provides our employees, business partners and others with a channel to report any concerns they may have in regard to compliance with our Code of Business Ethics and Conduct, or the laws and regulations that govern our business. We have a whistle blowing telephone hotline and email for our employees, business partners and others to report any misdeeds or improprieties committed by the management or employees of the Company;
 - Whistle Blowing telephone hotline: +1 902 421 1778
 - Whistle Blowing email: psah-whistleblowerchannel@globalpsa.com

To ensure that we have a centralized reporting system, a centralized unit called the Whistle Blowing Unit is tasked to handle all matters relating to whistle blowing. All matters reported are reviewed within a reasonable time frame by the Whistle Blowing Unit and a decision on whether to proceed with an investigation will be made.

A whistleblower protection officer serves to protect the whistleblower who has acted in good faith, after they have reported a matter. We provide assurance that the whistleblower's identity will be kept confidential unless such disclosure is required by the court or other regulatory authorities.

The Whistle Blowing Policy is reviewed on an annual basis by our human resource group in consultation with both our legal and internal audit groups and recommendations are made to the review panel for its endorsement before submission to the Audit Committee for final approval.

- **Operating Policy:** it further establishes our commitment to conducting business with the highest standards of ethics and integrity. Among other commitments, our Operating Policy states that we will report, investigate, and analyze incidents and non-compliances to prevent re-occurrence. Actions will be created and tracked. All personnel have an obligation to report hazardous conditions, incidents, or security threats to their supervisor.

5. Forced labour and child labour risks

We are dedicated to identifying and mitigating any potential risks of forced labour and child labour within our activities and supply chains. We conducted an initial risk assessment focusing on geographic locations of sourced goods and the specific industries involved, for example transportation. While it is challenging to assess risks from indirect suppliers, we mitigate potential risks through our Supplier Code of Conduct, as well as other policies, such as our Whistleblower Policy, that promote ethical business practices, complemented by anti-slavery clauses in our supplier contracts. These efforts underscore our commitment to maintaining a responsible and ethical supply chain.

6. Remediation of loss of income

We have not identified any instances of forced or child labour in the Company's activities and supply chains within the reporting period and therefore, we did not undertake any remediation measures. It follows that there have not been any instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains and accordingly, we have not undertaken remediation of such.

7. Training

While we do not currently have any formal forced or child labour specific training, we recognize its importance, and our senior management and Board of PSA Canada Ventures Limited have been informed of the Company's reporting obligations and their responsibilities under the Act.

8. Assessing effectiveness

We are committed to combating forced labour and child labour within our activities and supply chains. While we have not yet established formal measures to assess the effectiveness in preventing and reducing risks of forced labour and child labour of our current policies and procedures, we recognize the

importance of this evaluation. We are open to considering how to ensure continuous improvement in this area. This may include policy review or independent audits. Our dedication to ethical business practices remains strong, and we strive to uphold the highest standards in all our operations.

9. Joint Report Approval

This report is a joint report prepared on behalf of and approved by the Board of Directors of PSA Canada Ventures Limited pursuant to section 11(4)(b)(ii) of the Act.

10. 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 purposes of the Act, for the reporting year listed above.

For clarity, I have provided the attestation above in my capacity as a CEO of PSA Halifax Limited Partnership and PSA Halifax Fairview Cove Inc and not in my personal capacity.

[signature page follows]



Dated this 30 day of May, 2024.

A handwritten signature in black ink that reads "Jan Van Mossevelde".

Per: _____

Name: Jan Van Mossevelde

Title: CEO

I have the authority to bind PSA Canada Ventures Limited, PSA Halifax Limited Partnership and PSA Halifax Fairview Cove Inc.