



The Supply Chains Act Report 2022-2023

Introduction

Forced labour can be found in every country and every sector. The International Labour Organization estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through the global supply chains of businesses.

There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions and doing businesses in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

The measures introduced (the "**Supply Chains Act**"), aim to increase industry awareness and transparency and drive businesses to improve practices.

Premier Bulk Systems Ltd. ("**PBSL**") is defined as an "Entity" under the Supply Chains Act and therefore must submit an annual report to the Minister of Public Safety. The report must detail the steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used by PBSL in our supply chains.

All reports will be made available to the public in two ways:

- In a prominent location on PBSL's website
- In an electronic registry on the Public Safety Canada's website

The following information uses the Minister's online questionnaire as the template for the report.

Questionnaire Responses

#	Question	Response
1	This Report is for...	An entity
2	Legal Name of the reporting entity	Premier Bulk Systems Ltd.
3	Financial Reporting Year (Start Date)	January 1, 2023
4	Financial Reporting Year (End Date)	December 31, 2023
5	Is this a revised version?	No
6	Business number(s)	865735732
7	Is this a joint report?	No
8	Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?	No
9	Which of the following categorizations applies to the entity?	<p>The entity has a Canadian business presence:</p> <ul style="list-style-type: none"> • Has a place of business in Canada • Does business in Canada • Has assets in Canada <p>The entity meets the size-related thresholds:</p> <ul style="list-style-type: none"> • Has at least \$20 million in assets for at least one of its two most recent financial years • Has generated at least \$40 million in revenue for at least one of its two most recent financial years
10	Which sectors or industries does the entity operate in?	Transportation and Trucking
11	In which country is the entity headquartered or principally located?	Canada
12	In which province or territory is the entity headquartered or principally located?	Ontario
13	Government Institutions only	Not applicable

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#	Question	Response
1	What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity?	<p>Mapping supply chains</p> <p>In the process of developing and implementing an action plan for addressing illegal labour</p> <p>Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily</p> <p>In the process of requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of illegal labour in their activities and supply chains.</p> <p>Developing and implementing anti-labour contractual clauses</p> <p>In the process of developing and implementing anti-illegal labour standards, codes of conduct and/or compliance checklists.</p> <p>Developing and implementing grievance mechanisms</p> <p>In the process of engaging supply chain partners on the issue of addressing illegal labour</p>
2	Please provide additional information describing the steps taken (if applicable)	Not applicable
3	Which of the following accurately describes the entity's structure?	Corporation
4	Which of the following accurately describes the entity's activities?	<p>Distributing goods. These activities take place:</p> <ul style="list-style-type: none"> • in Canada • outside Canada <p>Importing into Canada goods produced outside Canada</p>
5	Has the organization identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?	While PBSL has not yet identified any parts of its activities and supply chains that carry a significant risk of illegal labour, we recognize that no industry involved in the transportation of goods can be assumed to be free of illegal labour and that suppliers of equipment could potentially carry a risk of illegal labour practices without our knowledge.

6	Please provide additional information on the entity's structure, activities and supply chains	<p>Premier Bulk Systems Ltd. is structured as a corporation with business operations throughout North America. Our operations are segmented into departments that handle our various activities, which include truckload logistics, maintenance services and the transport of bulk liquid, food grade bulk, bulk chemical and hazmat via a range of clean and well maintained equipment, enabling clients to transport their shipment safely.</p> <p>PBSL sources its fleet and equipment from suppliers within North America.</p> <p>As of May 23, 2024, our headcount is approximately 125 employees.</p> <p>PBSL is a partner in the Ontario Trucking Association and the Canadian Trucking Alliance.</p> <p>At PBSL, we are committed to maintaining ethical business practices and ensuring the integrity of our supply chain, which includes adhering to legal standards and avoiding any involvement with illegal activities, including illegal labour.</p>
7	Does the organization currently have policies and due diligence processes in place related to forced labour and/or child labour?	<p>PBSL is a voluntary participant in the Customs-Trade Partnership Against Terrorism (C-TPAT) program, the Partners in Protection (PIP) and the Free and Secure Trade (FAST) program, which focus on with enhancing border and trade chain security, combating against organized crime and terrorism and preventing contraband smuggling.</p>
8	If yes, which of the following elements of the due diligence process has the organization implemented in relation to forced labour and/or child labour?	Not applicable
9	Please provide additional information on the organization's policies and due diligence processes in relation to forced labour and child labour (if applicable)	<p>While not specifically targeting illegal labour, the C-TPAT, PIP and FAST programs see PBSL ensuring that we maintain appropriate security measures and systems to meet or exceed security requirements set out in these programs, maintain procedures for identifying and reporting suspicious situations involving potential illegal customs or immigration activities and collaborate regarding best practices in the industry regarding transportation security.</p>
10	Has the organization identified forced labour or child labour	<p>Other, please specify: No, we have not started the process of specifically identifying risks for illegal labour.</p>

	risks in its activities and supply chains related to any of the following sectors and industries?	
11	Please provide additional information on the parts of the organization's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the organization has taken to assess and manage that risk (if applicable)	Not applicable
12	Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains?	Not applicable, we have not identified any illegal labour in our activities and supply chains.
13	Please provide additional information on any measures the organization has taken to remediate any forced labour or child labour (if applicable)	Not applicable
14	Has the organization taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?	Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of illegal labour in our activities and supply chains.
15	Please provide additional information on any measures the organization has taken to remediate the loss	Not applicable

	of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable)	
16	Does the organization currently provide training to employees on forced labour and/or child labour?	No, not specifically on illegal labour.
17	If yes, is the training mandatory?	Not applicable.
18	Please provide additional information on the training the organization provides to employees on forced labour and child labour (if applicable)	Not applicable
19	Does the organization currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?	No.
20	Please provide additional information on how the organization assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable)	Not applicable

Attestation

This report has been approved by Premier Bulk Systems Ltd.'s board of directors on the 30th day of May, 2024.

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.

PREMIER BULK SYSTEMS LTD.

Per:



Name: Kevin Berry
Title: President

I have authority to bind the Corporation