



Report on Forced Labour in Canadian Supply Chains

Student Transportation of Canada Inc. (“STC”) submits this report (the “**Report**”) in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

STC is headquartered in Barrie, Ontario. It provides bus transportation services throughout Canada, primarily in British Columbia, Alberta, Saskatchewan, Ontario and Nova Scotia.¹ STC does not conduct operations in any other country.

STC does not appear subject to the Act; however, as STC imports occasional goods into the country, this Report is being submitted out of an abundance of caution. Furthermore, and in any event, STC is committed to preventing and reducing the risk that forced labour or child labour is used in its supply chains, regardless of the whether the Act applies.²

As part of STC’s commitment and in furtherance of the objectives of the Act, STC is presently undertaking the following measures to prevent and reduce the risk that forced labour is used in its supply chains:

- evaluating vendors to assist STC in supply chain mapping and internal risk assessments of forced labour in STC’s activities and supply chains; and
- implementing a provision in STC’s code of conduct that sets out the compliance standards required of its suppliers.

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. This report was approved by the Board of Directors of STC’s parent company, Student Transportation of America Inc.

Per:

Christopher Harwood – President

May 31, 2024

I have the authority to bind Student Transportation of Canada Inc.

¹ References to “STC” in this Report shall includes its subsidiaries, including Pacific Western Transportation Ltd.

² This Report shall use the words “forced labour” to refer to forced labour and child labour.

SCHEDULE “A”

ANNUAL REPORT

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?

- evaluating vendors to assist STC in supply chain mapping and internal risk assessments of forced labour in STC’s activities and supply chains; and
- implementing a provision in STC’s code of conduct that sets out the compliance standards required of suppliers.

2. Please provide additional information describing the steps taken.

- See response to Question # 1.

3. Which of the following accurately describes the entity’s structure?

- Corporation.

4. Which of the following accurately describes the entity’s activities?

- Periodic importation of goods into Canada produced outside of Canada. As described above, it does not appear that STC is captured by the Act; however, the guidance to date is not clear whether the Act applies to STC, and therefore this Report is being provided out of an abundance of caution. STC will continue to review and assess the guidance to determine whether subsequent reporting is required.

5. Please provide additional information on the entity’s structure, activities and supply chains.

- STC provides bus transportation services within Canada. Its services are primarily related to student transportation, employee transportation, motorcoach transportation and transit;
- STC operates in Canada only. It’s parent company operates in the United States and is not a reporting entity under the Act; and
- STC imports periodic goods into Canada in relation to the services it provides.

6. Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?

- STC is currently evaluating vendors to assist and monitor against the use of forced labour and/or child labour in its supply chains.

7. If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour?

- developing a process for identifying and assessing adverse impacts in operations, supply

chains and business relationships;

- evaluating vendors to assist STC in supply chain mapping and internal risk assessments of forced labour in STC's activities and supply chains; and
- embedding responsible business conduct into policies and management systems.

8. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour.

- Policies: STC's Code of Conduct requires STC, its employees and contractors to comply with all applicable laws and regulations.
- Due Diligence: See response to Question #1

9. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?

- No

10. If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains?

- Not Applicable

11. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries?

- No

12. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk.

- See response to Question #1 and #7 for steps that STC has taken to manage forced labour risks. STC continues to review its policies and procedures with respect to the further assessing and managing such risks.

13. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?

- Not applicable.

14. If yes, which remediation measures has the entity taken?

- Not applicable.

15. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour.

- Not applicable.

16. Has the entity 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?

- No.

17. Please provide additional information on any measures the entity has taken 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.

18. Does the entity currently provide training to employees on forced labour and/or child labour?

- Not currently and, as mentioned above, STC is evaluating vendors to assist STC in supply chain mapping and internal risk assessments of forced labour in STC's activities and supply chains.

19. If yes, is the training mandatory?

- Not applicable.

20. Please provide additional information on the training the entity provides to employees on forced labour and child labour.

- See response to Question #7 and #18.

21. Does the entity 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?

- STC is in the process of developing and implementing a provision in STC's code of conduct that sets out the compliance standards required of suppliers.

22. If yes, what method does the entity use to assess its effectiveness?

- N/A

23. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.

- STC continues to review its approach to assess the effectiveness of its policies to ensure that forced labour and child labour are not being used in its activities and supply chain.