

**BILL S-211 REPORT**

**North 60° Petro Ltd.**

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## Introduction

This report is North 60° Petro's response to comply with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("the Act") for the financial year ending December 31, 2024. The reporting entity covered by this statement is North 60° Petro, business number 897795985.

For the purposes of the Act, North 60° Petro ("North 60", "The entity") meets the entity definition by having a business in Canada, does business in Canada, has assets in Canada and meets the threshold for revenue, assets and employees.

North 60 is incorporated in Alaska and operates its business in Canada. North 60 follows Canadian federal standards of employment and is obligated to submit a report to the Minister of Public Safety and provide a public report in response the Supply Chains Act by May 31, 2024.

Guided by its purpose to provide quality fuels and lubricants to commercial and industrial customers at competitive prices, North 60 strives to be a leader in everything it does and expects its representatives to act with accountability, commitment to excellence, integrity, respect, responsiveness and flexibility and transparency.

Forced labour and child labour is contrary to our statement of purpose, vision and values, therefore North 60 does not endorse any human trafficking and modern slavery within its organization or any organization with whom it conducts business with.

## 1. Structure, Activities and Supply Chain

North 60's bulk terminal is located in Whitehorse, the capital city of Yukon Territory. Situated on the southwest bank of the Yukon River, this facility is the central storage and distribution point for all operations throughout the Yukon Territory and northern British Columbia. We specialize in the marketing and distribution of fuels, lubricants, and other petroleum products to mining, construction, aviation, transportation, government, and forestry trades. North 60 is a proven name for reliable fuel delivery service in Whitehorse. North 60 works with twenty different suppliers in the supply chain, not including suppliers who offer non-goods related services. These suppliers primarily are focused on supplying fuel and petroleum products to North 60, products such as fuel and lubricants.

Using the North American Industry Classification System (NAICS) Canada 2022 Version 1.0, sectors in North 60's supply chain and related activities were classified into the following industries:

- (41) Wholesale Trade
  - (412) Petroleum and petroleum products merchant wholesalers
    - (412110) Petroleum and petroleum products merchant wholesalers
- (44) Retail Trade
  - (447) Gasoline Stations
    - (447110) Gasoline stations with convenience stores

## 2. Policies and Processes in Relation to Forced and Child Labour

North 60 does not maintain formal firm-wide Purchasing Policies or a Supply Chain Code of Ethics. Hence, for the previous fiscal year, there were no policies or processes which were focused specifically on forced and child labour.

Honesty and due diligence are the fundamental pillars of North 60's supply chain principles and ethics. All employees are expected to work under these guiding pillars. Regarding its operations, North 60 adheres to the federal employment standards in Canada.

To ensure that North 60 adheres to the spirit of the Act, we are looking to develop and implement supply chain policies and procedures which will include provisions to ensure transparency in supply chains, with a focus on child and forced labour. Additionally, North 60 intends to foster collaboration with supply chain partners, local communities, and other stakeholders to address the issue of forced labour and child labour.

## 3. Identification of Forced and Child Labour Risk

To understand potential areas of forced or child labour risks in the supply chain, North 60 recently carried out a risk assessment process. This process was guided by insights provided by the Walk Free Global Slavery Index, the OECD Due Diligence Guidance for Responsible Business Conduct, and by the US Department of Labor's List of Goods produced by Child Labour or Forced Labour. In conducting our supply chain forced and child labour risk analysis, we were able highlight potential risks of forced or child labour associated with certain goods and certain countries.

Our risk identification exercise does not presuppose the actual use of forced or child labour within our operations or supply chains, rather, it is aimed at recognizing potential scenarios where such risks might arise, thereby further enabling us to implement effective preventative measures. Our assessment acknowledges that no industry is entirely exempt from the risks of forced and child labour and there are inherent vulnerabilities within certain sectors of our supply chain, particularly in regions where regulatory frameworks and enforcement mechanisms might not be robust.

Our analysis considered specific geographic regions that, according to the Walk Free Global Slavery Index and other credible sources, present a higher risk of forced and child labour practices. This geographic risk assessment, was combined with an assessment of at-risk-goods categories, further enabling us to apply a targeted lens to our risk assessment.

### **Risk Assessment Findings**

North 60 is involved only with Canadian and US suppliers for purchases, and both countries are widely considered as having a low prevalence of forced labour or slavery in their workforce.

North 60 also considered the data from the US Department of Labor's List of Goods Produced by Child Labour or Forced Labour. This is an important step in isolating specific goods from our import portfolio, or our suppliers' import portfolio that may be susceptible to forced or child labour. By considering this data against the products that North 60 imports, it was found that none of our imports are subject to a risk of being associated with forced or child labour practices.

Overall, the findings from our risk assessment suggest that there is minimal exposure to forced and child labour risks within the supply chain in the context of overall expenditures. North 60 would also like to highlight the highly technical and specialized nature of the petroleum industry, which would itself pose a barrier to the employment of child labour.

#### [4. Remediation of Forced and Child Labour](#)

After a thorough analysis of our supply chain, North 60 has not found any instances of forced and child labour in the previous reporting year.

In the event that North 60 identifies or comes across any forced or child labour instance within our supply chain, we will adhere to the guidance provided by Public Safety Canada and refer to the OECD guidelines to chart out an appropriate course of forced or child labour remediation.

#### [5. Remediation of Loss of Income](#)

After a thorough analysis of our supply chain, North 60 has not found any instances of forced and child labour in the previous reporting year, and hence, have not identified any vulnerable families which may have experienced a loss of income.

In the event that North 60 identifies or comes across any forced or child labour instance within our supply chain, we will adhere to the guidance provided by Public Safety Canada and refer to the OECD guidelines to chart out an appropriate course of loss of income remediation.

## 6. Employee Training

While North 60 does not currently offer formal, dedicated training on forced or child labour, the company acknowledges the critical importance of raising employee awareness on these issues. To date, training has been informal; however, North 60 is actively working to enhance its approach.

As a first step, all employees recently participated in a Bill S-211 Awareness Training session. This session provided an overview of North 60's responsibilities under the Fighting Against Forced Labour and Child Labour in Supply Chains Act and introduced practical tools for recognizing and responding to potential risks.

Looking ahead, North 60 plans to build on this foundation by developing structured training and awareness programs that equip employees at all levels with the knowledge and skills to identify and address forced and child labour risks in the supply chain.

North 60 remains fully committed to the principles of Bill S-211 and to the broader fight against forced and child labour in all its operations and partnerships.

## 7. Assessing Effectiveness

North 60 is unable to ascertain the effectiveness of the measures implemented to assess and manage the risk of forced labor and child labor for the previous reporting year.

To enhance our efforts moving forward, North 60 intends to require suppliers to submit an annual attestation which will affirm their adherence to the relevant provisions of the Act.

North 60 is committed to continuous improvement on this subject as an organization to ensure transparency and accountability in our supply chain operations.

8. Approval and Attestation of the Report

In accordance with the requirements of the Act, and in particular Section 11, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable due 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.

Full Name:                     Qin Ren                    

Title:                     Controller                    

Date:                     May 23, 2025                    

Signature:                                         

“I have the authority to bind North 60° Petro”