

Virginia Transportation Corporation Modern Slavery Report

2024



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1. Introduction

This report describes the actions taken by Virginia Transportation Corporation from January 1, 2024, to December 31, 2024. The report has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (hereafter “The Act”).

Founded in 1994, Virginia Transportation Corporation is a privately held auto hauling company headquartered in West Warwick, Rhode Island, USA, with existing operations across North America. VTC specializes in end-to-end vehicle logistics services, ranging from secure and reliable transportation for auto manufacturers (OEMs), fleet remarketers, dealerships, and vehicle storage facilities.

VTC's core services include vehicle loading and unloading, long-haul and regional transportation, yard management, and storage. We operate a fleet of Class 8 vehicles while maintaining terminal and storage locations in primary automotive distribution corridors.

Our operations are rooted in a strong commitment to safety, a focus on exceeding client expectations, and a deep respect for our team. We take great pride in the quality and independence with which we manage our fleet and are driven by a continuous improvement mindset.

More recently, we have expanded that focus to include a leadership role in sustainability within the auto logistics industry. This report outlines some of our key efforts in that regard.

2. Our Commitment

At Virginia Transportation Corp, we are committed to upholding and complying with all applicable policies, regulations, and laws in our operating regions. In developing our internal policies, particularly policies related to ethical business conduct, human rights, and our ongoing work to strengthen responsible supply chain practices, we drew guidance from the ten principles of the United Nations Global Compact and the International Labor Organization.

As expressed in the following sections, Virginia Transportation Corporation has taken the steps outlined below to prevent and reduce the potential risk of forced labor and/or child labor taking place in any part of our processes/operations.

- Developing and implementing an action plan for addressing forced labor and/or child labor
- Developing a system to gather information on worker recruitment and maintaining internal controls, ensuring all workers are recruited voluntarily.
- Developing and implementing child protection policies and processes
- Developing and implementing grievance mechanisms.
- Developing and implementing training and awareness materials on forced labor and/or child labor.



3. Our Policies

Virginia Transportation Corporation (VTC) adopted a Business Ethics Policy endorsed by our senior management, president, and CEO to demonstrate the standards we expect from our employees, stakeholders, and partners across our value chain. This policy outlines the non-negotiable ethical principles that guide how we conduct business responsibly and with integrity.

The Business Ethics Policy applies to all VTC employees, stakeholders, and business partners. Alongside our long-standing commitment to safety and quality service, this policy forms a core part of how we operate as a company. It includes explicit provisions prohibiting retaliation against individuals who report misconduct, including whistleblowing, anti-corruption concerns, and conflicts of interest.

Now in its first year of implementation, the business ethics policy will undergo an annual review to assess evolving risks and identify areas where additional controls may be needed.

In addition, VTC has implemented a Human Rights Policy that applies to all employees, managers, senior leadership, and contractors involved in any part of our operations. The policy clearly states our zero-tolerance stance on modern slavery and human trafficking. We have taken proactive steps across our operations to eliminate any conditions that may support or conceal these practices.

3.1. Our Supply Chain

Virginia Transportation Corporation recognizes the importance of extending the principles behind our internal policies into our supply chain to ensure alignment with our ethical and labor standards. To support this, we are developing a Supplier and Business Partner Code of Conduct to guide our suppliers to uphold ethical business practices and fair labor policies. The aim is to promote protections for workers within our supply chain and, ideally, influence responsible practices further down their networks.

Our Human Rights Policy complies with the narrative of the International Bill of Human Rights and the International Labor Organization's (ILO) Declaration on



Fundamental Principles and Rights at Work as our attempt to ensure all processes in our operations remain free from any instances of infringement of the rights of existing individuals.

By enforcing our Business Ethics Policy that came into effect in March of 2024, we are working internally to determine the viability of screening our suppliers during initial procurement processes.

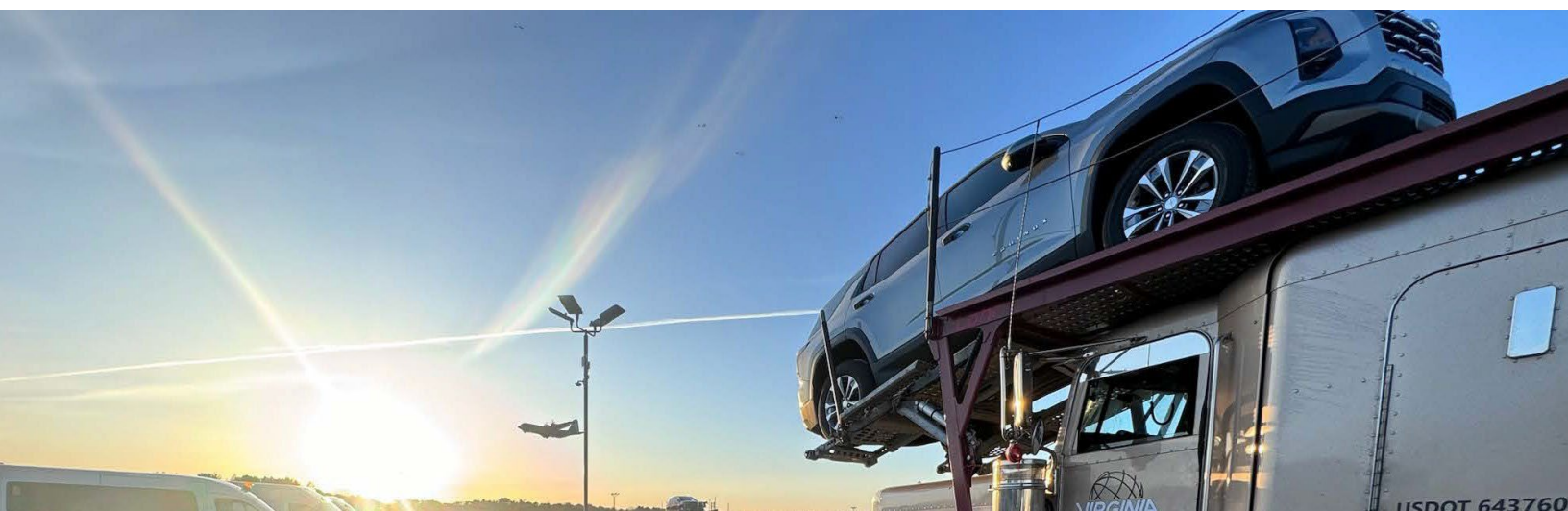
4. Our Risk Assessment

At Virginia Transportation Corporation, we recognize that, due to the nature of our operations in the auto hauling and logistics sector, there are inherent risks related to forced labor and child labor, particularly within complex supply chains and subcontracted services.

While we have not identified any confirmed instances within our operations to date, we acknowledge that industries involving transportation, equipment procurement, and third-party labor can be vulnerable to practices that conflict with fundamental human rights standards.

As part of this effort, we are taking steps internally to assess existing risks more systematically. We aim to map our supply chain to identify areas where elevated risks may exist, allowing us to prioritize better regions or operations requiring deeper due diligence and corrective actions.

We are also working to strengthen our ability to monitor potential occurrences, improve transparency across our operations and supplier relationships, and enforce our organization's zero-tolerance stance on forced labor and child labor throughout our value chain.



5. Education and Awareness

5.1. Training

All Virginia Transportation Corporation Employees receive mandatory, ongoing training on relevant regulatory requirements, organizational policies, and ethical practices. As part of the onboarding process, all new employees are assigned a required training package that includes reviewing and acknowledging the Business Ethics Policy and Human Rights Policy. In addition, all employees are expected to review the contents of both policies annually to stay informed of current obligations and any new controls or updates introduced.

5.2. Reporting Mechanisms

Our Business Ethics Policy and Human Rights Policy encourage reporting any suspected violations of ethical conduct, human rights, or labor standards. Virginia Transportation Corporation has adopted a formal Grievance Resolution Policy to support this, which provides structured avenues for employees to report concerns through informal and formal channels. Reports are handled with confidentiality, and protections against retaliation are in place. All reports are reviewed and investigated by designated personnel, and appropriate corrective action is taken when necessary.

5.3. Continuous Improvement

At the time of preparing this report, Virginia Transportation Corporation is unaware of any conduct that would constitute forced labor, child labor, or a violation of the Act. At the end of the financial year, we will review the measures outlined in this report to assess their effectiveness and determine any improvements needed to strengthen our efforts to prevent and reduce the risk of modern slavery in our supply chains.

6. Conclusion and Attestation

This report was approved pursuant to paragraph 11(4)(a) of the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* by the Senior Management of Virginia Transportation Corporation for the financial year ending December 31, 2024.

In accordance with section 11 of the Act, I hereby attest that I have reviewed the information contained in this report for the entity named above. To the best of my knowledge, and having exercised reasonable due diligence, I confirm that the information is true, accurate, and complete in all material aspects of the Act, for the above reporting period.

I have the authority to bind Virginia Transportation Corporation.



Full Name: Doug Schmidt

Title: President

Date: 29th May 2024

I have the authority to bind Virginia Transportation Corporation.



Full Name: Leo Doire

Title: Chief Executive Officer

Date: 30th May 2024