



Modern Slavery Report - 2023

Message from the President and CEO

We stand by the principle that everyone has the right to be treated with dignity and respect. Direct Integrated Transportation ULC (“DITULC”) and Direct Limited Partnership (“DLP”) are dedicated to supporting and upholding the preservation of human rights in all our operations and throughout our supply chain. Our commitment to human rights is included in our National Employee Handbook (“Employee Code of Conduct”).

About Canada Cartage

With over 100 years of helping companies grow and succeed in Canada, Canada Cartage Corporation (“CCC”) (CCC, together with its subsidiaries including DITULC and DLP, “Canada Cartage”) provides national dedicated fleet solutions, general freight services, managed transportation, fulfillment & distribution, and home delivery. With a national network of terminals, cross-docks, and distribution centers, Canada Cartage is one of Canada’s largest and most trusted supply chain service providers. Driven to exceed customer expectations, and supported by technology and innovation, we bring simplicity to complex logistics challenges.

Commitments and Recognition

Trucking HR Canada has announced that Canada Cartage has again been selected as one of the country’s Top Fleet Employers. The award honours the best workplaces in Canada’s trucking industry. In addition, Canada Cartage was recognized as an Employer of Distinction for the fifth year in a row. As part of Trucking HR Canada’s review process, they assessed Canada Cartage’s formal HR policies in nine categories: recruitment and retention, employee engagement, workplace culture, compensation and total rewards, workplace wellness and mental health, workplace diversity and inclusion, training and skills development, corporate citizenship and environment, and HR innovation. The Top Fleet Employers’ selection criteria reflect Canadian human resources issues, trends and working environments, and has been validated by a panel of trucking industry experts and a Certified Human Resource Leader (CHRL). It also echoes Trucking HR Canada’s standards of excellence and considers every position in a fleet. This is the second award this year recognizing Canada Cartage as an employer of choice. Earlier this year, the company was acknowledged by Forbes as one of “Canada’s Best Employers.” This is the eighth-straight year, Canada Cartage has been recognized with this award. In 2023, Canadian HR Reporter recognized Canada Cartage as a “5-Star Rewards & Recognition” winner, and again by Forbes as one of “Canada’s Best Employers for Diversity”.

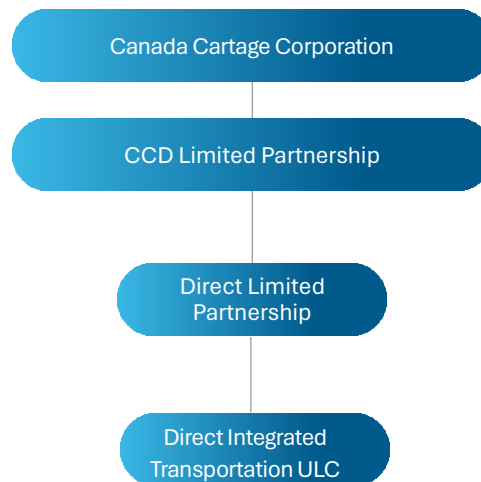


Corporate Structure and Activities

Direct Integrated Transportation ULC (“DITULC”) is incorporated under the laws of Alberta, Canada. Its head office is located in Mississauga, Ontario. DITULC enters into transportation, warehousing and logistics contracts with customers and issues invoices for transportation and logistics services provided Direct Limited Partnership (“DLP”). DITULC is a wholly owned subsidiary of DLP. DLP is a limited partnership formed under the laws of Manitoba. The reporting entities for the purpose of this report are DITULC and DLP.

DLP is controlled and wholly owned by CCD Limited Partnership, a limited partnership formed under the laws of Manitoba which is controlled and owned by CCC. CCC is federally incorporated under the laws of Canada. The head office for CCDLP and CCC is located in Mississauga, Ontario. CCDLP, through its general partner Canada Cartage GP Inc., is responsible for appointing the Board of Directors of Direct General Partner Corporation which manages the business and affairs of DLP.

The relevant organizational structure is shown below for DITULC and DLP:



Governance

DITULC is the importer of record for certain goods that are imported in Canada for its third-party customers in connection with its logistics business. DITULC holds certain Health Canada site licenses and is the importer of record for some natural health products, supplements and similar products that we warehouse and distribute for certain third-party customers. DITULC imports these goods into Canada under these site licenses as agent for our customers to facilitate the logistics process for them and their end-users/customers. DITULC and DLP do not procure, sell or manufacture these natural health products or supplements goods on their own behalf and, as such, these entities have limited visibility or control over the procurement supply chain. Instead, DITULC and DLP each have a limited role as logistics service providers for the finished products in question. DLP is the operating entity which leases facilities, employs workers and procures goods and services in connection with the provision of transportation and logistics services in Canada. As such,



both DLP and DITULC are responsible for creating the compliance program for anti-modern slavery efforts and the preparation of this report. The anti-modern slavery strategies described in this report applies to DLP and DITULC.

The financial year for DITULC and DLP runs from January 1 to December 31 of each calendar year. This report covers the 2023 calendar year unless noted otherwise elsewhere.

The General Counsel for Canada Cartage leads DITULC and DLP's efforts to identify and remove modern slavery from its supply chain. In fulfilling this mandate, the General Counsel coordinates with the Procurement, Human Resources, Finance, Operations and other business units. The General Counsel reports directly into the President and Chief Executive Officer.

The Operations Team and Human Resources Team for DLP is responsible for developing, implementing, directing, reviewing, and revising the ethics and compliance program to be consistent with our risk profile and business strategies and to meet best practices. These teams continue to oversee and implement monitoring and remediation plans for ethics and compliance risks and violations.

Current Locations

The operational sites and offices for DITULC and DLP are all located in countries with strong legal and human rights regulations. These sites are all located within Canada and are at low risk for modern slavery due to these protections. We comply with all employment, labour, occupational health and safety, human rights, and other applicable laws in the regions in which we operate.

Employees and Contract Workers' Locations

All DLP employees are above the legal age to work. DITULC does not have any employees. We protect and support the communities where we work by maintaining safe working conditions in which all employees are given an appropriate number of working hours and fair compensation for their work.

As of December 31, 2023, DLP had a total of 1333 employees all of whom are located in Canada. DLP also uses independent contract workers in our transportation operations. As of December 31, 2023, DLP had a total of 176 contractor workers engaged in our operations all of whom are located in Canada. DITULC does not have any employees or independent contract workers.

Human trafficking, or modern slavery, is a criminal industry that denies people their freedom and human rights. We stand firmly against human trafficking and slavery and all human rights violations. We are hired fairly and with consent, and we hire others fairly and with consent.

Supply Chains

DLP's procurement employees and operations are primarily located in Mississauga, Ontario, Calgary, Alberta and other locations within Canada.

COUNTRY ANALYSIS



DITULC contracts with DLP pursuant to an inter-company services agreement for DLP to provide all transportation and logistics services on behalf of DITULC as the customer contracting and invoicing entity. As such, substantially all of the revenue procurement of DITULC is performed by DLP.

The majority of DLP suppliers are located in Canada or the United States.

SPEND CATEGORY ANALYSIS

The largest procurement spend for DLP is for fuel, tractors, trailers, equipment related to rolling stock, purchased transportation, warehouse racking and material handling equipment and related parts and suppliers. DLP's fuel is sourced from large and reputable companies in Canada and the United States. DLP's tractors, trailers, equipment and related parts and suppliers are sourced through leading manufacturers in Canada and the United States. A number of other miscellaneous categories make up the remaining amount of our procurement spend but these costs are widely distributed amongst numerous diverse categories such as: corporate services, professional services, equipment, IT, packaging, utilities, facilities management, leasing, travel services, etc.

Modern Slavery Risk Assessment

We conducted a risk assessment by reviewing our procurement spend categories, location of our suppliers, location of our operations, and location of our employees. These were compared against the high-risk countries and goods criteria outlined by Walk Free and the United States Department of Labour List of Goods Produced by Child Labour or Forced Labour.

EMPLOYEES AND CONTRACT WORKERS

DLP's modern slavery risk assessment for direct employees and contract workers is low. DLP's work force consists primarily of full-time employees employed in Canada. DLP is confident that, as a result of recruitment, remuneration and compliance programs, there is a low risk that any of its direct employees or contract workers are subjected to modern slavery.

STAFFING AND RECRUITMENT AGENCIES

DLP has reviewed its staffing agencies and recruitment agencies. In certain provinces of Canada, agencies are legally required to be licensed. Ontario recruitment agencies will need to be licensed effective July 1, 2024. All of the staffing and recruitment agencies we use in these regions are therefore either licensed or in the process of becoming licensed.

SUPPLY CHAIN PARTNERS

DLP and DITULC's largest risk of modern slavery arises from its supply chain and business partners. Our supply chain involves several sub-suppliers, the identities of which are currently not well understood. In 2023, DLP and DITULC focused its modern slavery assessment on its direct supply chain partners. In particular, we focused on understanding where our direct suppliers are located and identifying the categories of goods purchased from these suppliers. Most of our direct suppliers are located in Canada and the United States, however, we purchase some goods from distributors



which may make determining the country of origin of the goods more difficult. We recognize that there may be some discrepancies between where the distributors are located and the country of origin of the goods we purchase. We are still in the process of understanding this in greater depth.

We also purchase a small amount of goods and services that are used in most businesses but that are at a higher risk for modern slavery such as clothing items used for personal protective equipment, cell phones and other computer and electronic devices, cleaning (through our office and facility leases), coffee and waste disposal. For 2023, we have focused our efforts on conducting a current state assessment. In 2024 and beyond we will focus on areas that present the greatest risk and we will continue to assess its suppliers.

Policies and Program

POLICIES

We recognize that conducting business ethically, maintaining compliance, and upholding human rights is critical to the success of our business. We routinely review our policies and practices and update them as necessary. In 2024, we will adopt an Anti-Modern Slavery Policy which we expect will set out the following:

- Definition and examples of modern slavery;
- Supplier screening processes;
- Expectations of its suppliers;
- Prohibited supplier practices; and
- Roles and expectations for employees.

Employee Code of Conduct:

Our Employee Code of Conduct is designed to assist everyone who works for or with or represents DLP and DITULC, including employees and directors, in making decisions with integrity and honesty. It includes references to our policies and guidelines that promote compliance with laws and regulations. The Employee Code of Conduct highlights the importance of compliance and ethical conduct in all areas of our business. We may also institute corrective actions for those who do not follow our policies up to and including termination of employment or engagement when warranted.

THIRD-PARTY SCREENING PROCEDURES

We seek to work with suppliers, customers, agents, and distributors who are aligned with our efforts to conduct ethical business practices. Our business impacts include the indirect impacts from our supply chain, and we are committed to ensuring that our partners meet our standards and commitments for environmental responsibility, human rights, and health and safety of employees and communities. The level of risk determines the level of further due diligence which may include further investigation, risk mitigation, and greater scrutiny.



2023 Activities for Combating Modern Slavery

In 2023, we focused our efforts on:

- Conducting an initial assessment of policies, procedures and risks for DLP, DITULC and their suppliers and customers; and
- Educating and discussing new legislative requirements with the Senior Management Team for Canada Cartage.

Assessing our Approach

Measures Taken to Remediate Modern Slavery and Associated Income Loss

To date, we have not identified any modern slavery in our supply chain. Accordingly, we have not taken any measures to remediate modern slavery or any associated loss of income to the most vulnerable families that results from any measure taken to eliminate the use of modern slavery in our supply chain.

Future Priorities

We have the following goals for 2024 and future years:

- Adopting the new Anti-Modern Slavery Policy;
- Reviewing our contracts with recruitment and staffing agencies to determine if these vendors are licensed and to explore opportunities to minimize the risk of Modern Slavery;
- Drafting contractual clauses to include in our supply contacts which encourage suppliers to eliminate Modern Slavery from their supply chains;
- Consider creating an Anti-Modern Slavery Action Committee likely consisting of individuals with the following expertise: Procurement, Legal, Human Resources and Operations; and
- Liaise with industry associations to learn about their best practices in eliminating modern slavery from their supply chains.

Scope of this Report and Approval

This report covers performance for DLP and DITULC. The report has been approved by the sole director of (i) Direct General Partner Corporation, on behalf of DLP, and (ii) DITULC on May 24, 2024.

In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for the entity or entities listed above. Based on our knowledge, and having exercised reasonable diligence, we 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. The signatory below confirms that he has the legal authority to bind the relevant entity.



This report will be filed online with the Canadian Government's reporting portal and it will also be published on Canada Cartage's external website www.canadacartage.com.

William Jeffrey Lindsay

William Jeffrey Lindsay

Director, President and Chief Executive Officer of Direct General Partner Corporation, on behalf of Direct Limited Partnership

I have the authority to bind Direct General Partner Corporation, on behalf of Direct Limited Partnership

Signed on May 24, 2024

William Jeffrey Lindsay

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Director, President and Chief Executive Officer of Direct Integrated Transportation ULC

I have the authority to bind Direct Integrated Transportation ULC

Signed on May 24, 2024