



# **TRANSIT TRAILER REPORT**

## **BILL S-211**



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## Introduction

The following report has been drafted by Transit Trailer Limited in alignment with section 11 of Bill S-211 for the financial year ending August 31st, 2023. The entity covered by this report is Transit Trailer Limited (Business Number: 131237364)

Transit Trailer Limited meets the definition of reporting entity under the act by having a place of business in Canada, doing business in Canada, and having assets in Canada. In addition, Transit Trailer Limited meets two out of the three size-related thresholds for revenue and assets as well as for importing and distributing goods.

Transit Trailer Limited emphasizes its dedication to honesty and integrity in all business endeavors. Compliant with Bill S-211, this report elucidates the steps taken by Transit Trailer Limited to address potential risks related to child labour and forced labour within its operational framework.

## Section A: Structure, Activities, and Supply Chains

Transit Trailer Limited operates as a Canadian entity under the umbrella of a private ownership headquartered in Ontario, Canada.

Transit Trailer is a reputable dealership within the trailer industry, specializing in sales of a wide range of new and used trailers of various makes and models. Additionally, Transit Trailer provides sales of parts and services, with trailer sales accounting for a significant part of its business operations. The supply chain network is predominantly localized within North America, focusing primarily on Canada and the United States.

## Section B: Policies and Due Diligence Processes

At Transit Trailer Limited, upholding ethical standards across our operations and supply chain is a foundational principle. Our commitment to ethical conduct, in tandem with our focus on fostering strong vendor relationships, serves as a preventative measure against potential risks such as forced or child labour and other unethical practices within our operational and supply networks.

During the previous fiscal year, Transit Trailer Limited did not have a formalized due diligence policy specifically targeted at managing and mitigating the risks of forced or child labour within its operations and supply chain. However, Transit Trailer Limited deliberately collaborates with reputable vendors, inherently minimizing the likelihood of encountering unethical labour practices.

In consideration of our ongoing commitment to strengthening our policies and due diligence procedures, Transit Trailer Limited is currently considering the development of a Supplier Code of Conduct. As we advance, formal communication will be issued to inform all suppliers accordingly. Following such notification, we intend to engage suppliers in the process of endorsing this prospective document, emphasizing our steadfast commitment to upholding rigorous supply chain standards. This contemplated measure is intended to augment existing efforts aimed at mitigating the risks associated with forced and child labour within our supply chain.

Looking ahead, Transit Trailer Limited is dedicated to enhancing its due diligence efforts to actively mitigate the risk of forced and child labour in its supply chain. Recent due diligence endeavors, including a thorough risk assessment process detailed in Section C below, exemplify this commitment. These efforts, alongside other initiatives outlined in this report, underscore Transit Trailer Limited's unwavering commitment to upholding ethical labour standards and fostering a sustainable and responsible supply chain.

## Section C: Forced Labour and Child Labour Risks

During the previous fiscal year, we had not started the process of identifying risks. However, to understand where in the supply chain forced or child labour risks may exist, Transit Trailer Limited 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 Labour’s List of Goods Produced by Child Labour or Forced Labour. Transit Trailer Limited has relied on these documents for its risk identification process as they are considered the best source of information for Canadian entities as it relates to the risk of forced or child labour. In conducting the supply chain forced and child labour risk analysis, Transit Trailer Limited was able to understand potential risks of forced or child labour associated with certain countries.

This 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 Transit Trailer Limited 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.

The 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 a targeted lens to our risk assessment.

### **Risk Assessment Findings**

Through the application of the analysis, Transit identified its suppliers in two countries – Canada and United States. Imports from Canada accounted for most of our procurement spend followed by the United States. Canada & United States both presents a low risk in terms of prevalence of modern slavery, according to the Walk Free Global Slavery Index.

Transit also reviewed data from the US Department of Labour’s List of Goods Produced by Child Labour or Forced Labour. This step is crucial in identifying specific goods within our import portfolio that may be vulnerable to forced or child labour. Upon comparing this data with the products, we import, we found no evidence suggesting an elevated risk of association with forced or child labour practices.

Overall, the results of our risk assessment indicate a low level of exposure to forced and child labour risks within our supply chain relative to our overall expenditures. However, this does not diminish our commitment to acknowledging and addressing risks through our risk management procedures and policies. Regarding the identified risks, Transit will explore ways to allocate additional resources and efforts to support the mitigation and management of forced and child labour risks.

## **Section D: Remediation Measures**

During the previous fiscal year, our assessments have not uncovered any instances of forced or child labour within our operations or supply chains. Consequently, no specific remediation measures were taken. In alignment with the United Nations Guiding Principles on Business and Human Rights, we acknowledge the critical importance of having robust remediation measures in place. Our primary response may encompass a variety of actions, including:

**Collaboration with Suppliers:** Acknowledging the complexity of supply chains, we are committed to collaborating closely with our suppliers to ensure the effective implementation of remedial measures. This collaboration may involve offering guidance and support to our suppliers.

**Policy Review and Strengthening:** Any identification of forced or child labour will prompt a comprehensive review of our relevant policies and practices. This review aims to identify any necessary adjustments or improvements to strengthen our preventive measures and uphold our commitment to human rights across our operations and supply chains.



**Stakeholder Communication:** Upholding principles of transparency and accountability, we will communicate our remediation efforts and outcomes to relevant stakeholders, including affected communities, employees, customers, and investors. These communications will be conducted while respecting applicable privacy and confidentiality requirements.

While we have not encountered any cases of forced or child labour, we remain vigilant. Should such instances arise in the future, we are committed to taking immediate action. Given the intricate nature of supply chains, we pledge to collaborate closely with our suppliers to ensure effective implementation of any necessary remediation measures.

## **Section E: Remediation of Loss of Income**

During the previous fiscal year, Transit Trailer Limited has not identified any instances of child or forced labour in its operations or supply chains, and by way of a supply chain risk assessment has determined itself to carry a relatively low overall supply chain risk as it relates to forced or child labour. Thus, no measures have been taken to remediate the loss of income to vulnerable families.

Transit Trailer Limited recognizes the importance of being prepared to take immediate and effective action should any such issues arise. In instances where our endeavors to eradicate forced or child labour could potentially affect the income of vulnerable families, we will institute appropriate remedial actions. Our strategy will prioritize engagement over withdrawal, highlighting our dedication to utilizing our influence for constructive transformation.

## **Section F: Training**

During the previous fiscal year, Transit Trailer Limited did not administer internal mandatory training sessions specifically dedicated to addressing forced and child labour within the supply chain. Nevertheless, we are dedicated to implementing such training programs as deemed necessary, underscoring our unwavering commitment to ethical standards.

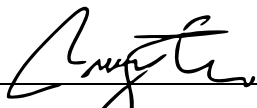
Our aim is to foster a supply chain and workforce that collectively prioritize vigilance and proactivity in preventing instances of forced and child labour.

## **Section G: Assessing Effectiveness**

While Transit Trailer Limited currently do not have any specific policies and procedures for assessing the effectiveness of preventing forced labor and child labor in its operations and supply chains, we are committed to implementing more robust measures should concerns arise or as best practices evolve.

## Attestation

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.

X   
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Murray J. Campbell, President  
May 30, 2024

“I have the authority to bind Transit Trailer Limited.”