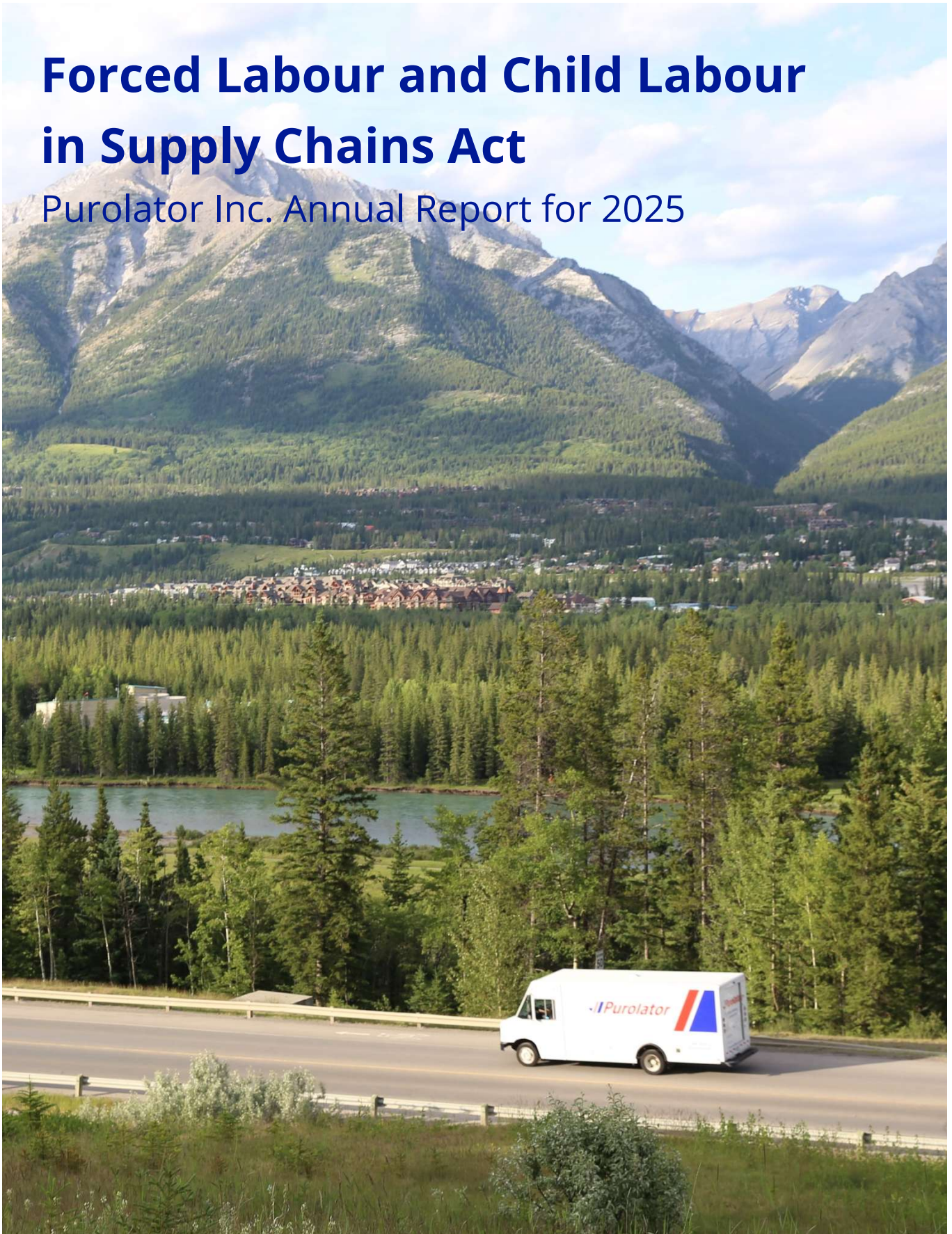


# Forced Labour and Child Labour in Supply Chains Act

Purolator Inc. Annual Report for 2025



# Fighting Against Forced Labour and Child Labour in Supply Chains Act

*Purolator Inc. Annual Report Submission for the Period January 1, 2025 – December 31, 2025*

This Report outlines the actions initiated by Purolator Inc. and its U.S. subsidiary Purolator International, Inc. (together, “Purolator”) to assess, mitigate, and address the risks of the use of forced labour and child labour across our supply chains and our future goals for on-going and effective due diligence.

## About Purolator

Purolator is a leading integrated freight, package, and logistics provider, delivering packages to, from, and within Canada. We are committed to the empowerment, safety, and security of our team of over 14,000 employees and our customers alike. Purolator acknowledges the importance of the *Fight Against Forced Labour and Child Labour in the Supply Chain Act* (the “Act”) and the impact it could have on Canada’s international commitment to contribute to the fight against forced labour and child labour.

## Activities and Pursuits

### *Importing and Production*

Purolator provides and offers for purchase, shipping supplies at its retail locations. As part of its due diligence, Purolator reviewed the suppliers who produce these goods and has conducted a thorough review to determine the full supply chain of these products through a platform. This platform is discussed in further detail in this report.

Purolator’s third-party customs broker retained data pertaining to the types and volume of goods imported during the 2025 reporting year. As part of its due diligence process, Purolator has completed a thorough review of this data for the purpose of complying with the Act and assessing the full scope of its supply chain network.

### *Activities of subsidiary*

Purolator Inc.’s subsidiary Williams Pharmalogistics Inc. does not meet the reporting requirement for the year 2025 based on the criteria in the Act. Pursuant to Public Safety Canada guidance, brokers acting as Importer of Record for clients are not subject to the reporting requirements. Therefore, Purolator Inc.’s subsidiary Livingston International is out of scope.

## Policies and Due Diligence Processes

Purolator's Code of Business Conduct and Ethics (the "Code") articulates the standards of conduct expected of all Purolator employees in areas of critical importance to Purolator. The Code addresses Purolator's commitment to compliance with the Act, sets out Purolator's expectation that employees comply with the law and act ethically at all times, which includes dealings with suppliers. We expect our suppliers to have similar standards in place and operate in compliance with all applicable laws and regulations.

To fight against the risk of forced labour and child labour in the supply chain, Purolator has implemented the following measures to prevent and minimize the risk in any step of the sourcing stage:

- Annual review and approval of the Code by the Board of Directors of Purolator Holding Ltd., being the governing body of the entity that controls each entity included in this Report (the "Board").
- Maintain policies on hiring and recruitment.
- Mandatory annual Code training for all active employees.
- Suppliers are required to confirm that they do not engage in forced labour and/or child labour in accordance with the Act during the request for proposal process.
- Purolator's standard vendor contract includes anti-forced labour and child labour provisions. This is effective for new contracts as of 2024.
- All suppliers are required to adhere to Purolator's Supplier Code of Conduct ("Supplier Code"). The Supplier Code requires all suppliers to comply with Canada's prohibition on the importation of goods produced by forced and/or child labour.
- All suppliers are required to adhere to Purolator's "Responsible Sourcing Standard", which expressly outlines Purolator's expectation that all contracted suppliers perform due diligence assessments to prevent and eliminate the risk of using forced labour or child labour.
- Annual requirement for suppliers to attest and confirm that their businesses, including their subcontractors, are committed to prohibiting the use of forced and child labour, as well as respecting human and employment rights in their operations.

In addition, Purolator engages the services of a globally recognized sustainability assessment platform that evaluates companies' environment, labour & human rights, ethics, and sustainable procurement performance across the globe (the "Vendor"). It provides a structured framework that is designed to systematically evaluate risks associated with forced labour and child labour across the supply chains. The Vendor evaluates and monitors the forced labour and child labour risk levels of Purolator's suppliers.

## Purolator's Supply Chains

The Vendor's assessment of Purolator's supply chains integrates two main factors: 1) Child and Forced Labour Risk and 2) Procurement Risk into a matrix. The Child and Forced Labour Risk is assessed based on industry-specific data, complemented by country-level insights sourced from The Global Slavery Index 2025. Purolator's procurement practices, such as its spend and criticality level, are submitted to the Vendor's assessment tool as a part of determining Procurement Risk. The Vendor reviews the Child and Forced Labour Risk and Procurement Risk to determine the overall "Modern Slavery Priority."

Using its database, the Vendor analyzed and matched four hundred and fifty-two (452) of Purolator's suppliers, representing 96% of total 2025 addressable spend. For any unmatched suppliers, Purolator conducts its own due diligence to ensure suppliers adherence with Purolator's contractual requirements and compliance with the Supplier Code.

The Vendor's analysis showed that the four hundred and fifty-two (452) suppliers span ninety-seven (97) industries and eight (8) countries. Further, it revealed that 82.5% of the suppliers are from Canada, 15.5% are from the United States, and the remaining 2.0% are from six (6) other countries (for a breakdown of the six countries, see Table 1.1 below).

<b>Distribution of Suppliers' Country</b>	<b>Count</b>
Canada	373
United States of America	70
United Kingdom	3
Switzerland	2
India	1
Germany	1
Netherlands	1
Ireland	1

Table 1.1 - Distribution of Suppliers' Country as provided by the Vendor

The Vendor proceeded to score Purolator's suppliers using a rating system from "very high" to "very low" based on the categories of "Human Rights Country Risk" and "Labour & Human Rights Industry Risk".

### 1) Human Rights - Country Risk

When assessing Human Rights Country Risk, the Vendor considers the country's health, social and human rights violations risk levels. The Vendor concluded that for this category, none of Purolator's suppliers are located in "very high" Human Rights Country Risk areas.

2) Labour and Human Rights - Industry Risk

When assessing Labour and Human Rights Industry Risk, the Vendor takes the following into account: Child Labour, Forced Labour and Human Trafficking; Diversity, Equity and Inclusion; Employee Health and Safety; Working Conditions; Social Dialogue as well as Career Management and Training.

According to Purolator’s supplier analysis report from the Vendor for 2025, the four hundred and fifty-two (452) suppliers fell into ninety-seven (97) industries found in ten (10) industry categories (for a breakdown of the ten (10) industry categories, see Table 1.2 below).

<b>Distribution of Suppliers’ Industry Category</b>	<b>Count</b>
Transportation & Logistics	127
Technology, Media & Communication	94
Business Services & Other Activities	87
Retail & Wholesale Trade	59
Manufacturing & Production	33
Financial Services & Insurance	24
Construction & Infrastructure	12
Healthcare, Social Services & Education	8
Accommodation, Hospitality & Food Services	5
Environmental Services & Waste Management	3

Table 1.2 - Distribution of Suppliers’ Industry Category

When assessing Labour & Human Rights Industry Risk, the Vendor considers the industry and its risk of labour and human rights violations for forced and child labour. Based solely on industry, the Vendor rated one hundred and thirteen (113) of Purolator’s suppliers as “very high” risk.

The distribution of their industry categories is shown below in Table 1.3:

<b>Industry Category of 113 "Very High Labor &amp; Human Rights industry risk" supplier</b>	<b>Count</b>
Transportation & Logistics	88
Business Services & Other Activities	13
Manufacturing & Production	4
Accommodation, Hospitality & Food Services	5
Construction & Infrastructure	3

Table 1.3 - Industry Category of 113 "Very High Labor & Human Rights industry risk" supplier

Purolator conducted a review of these one hundred and thirteen (113) suppliers and found that there were no known instances of forced or child labour reported for any of those suppliers.

### Modern Slavery Priority

The Vendor uses the suppliers' assessment results above to determine a "Modern Slavery Priority" and corresponding priority level (critical/strategic/moderate). It rated seven (7) of Purolator's suppliers as "Critical". Purolator conducted a review of these seven (7) suppliers and found no known instances of forced labour or child labour reported. This finding was further supported by the Vendor's 360° Watch, which is another compliance monitoring mechanism that it uses to track suppliers' compliance practices. These suppliers have completed Purolator's annual Forced and Child Labour attestation.

## Remediation Measures

Purolator has not identified any reports of forced labour or child labour across our supply chains or within our procurement activities to date.

## Remediation of Loss of Income

Purolator has not identified any reports of forced labour or child labour across our supply chains or within our procurement activities to date.

## Training

All Purolator employees are required to complete annual training as part of Purolator's Code of Conduct program. This training includes a section on forced and child labour. At the conclusion of the training, employees are required to certify that they have reviewed the Code and report any known Code violations.

## Assessing Effectiveness

The Board and Senior Leadership reviews and approves policies regularly. This includes risk management, the Code, as well as the Procurement Policy which incorporates Purolator's Responsible Sourcing Standard. All other policies and procedures are reviewed on a regular cadence.

Purolator tracks employee awareness of its corporate policies and procedures through its annual training and reports its completion rate to the Board every May. Purolator

ensures it obtains a one hundred percent (100%) completion rate for all active employees each year.

Purolator requires its suppliers to submit an annual attestation that it does not engage in forced labour or child labour.

Purolator engages the services of the Vendor to conduct an independent review to evaluate Purolator's supply chains' forced labour and child labour risks. To date, Purolator has not identified any occurrences of forced labour or child labour along its supply chains.

## Next steps

- During the 2026 fiscal year, Purolator will continue to review, assess, revise and implement processes and procedures as necessary to reduce the risk of forced labour and child labour in its supply chains.
- Purolator will continue to enhance its monitoring including through available tools.

## Attestation

The contents and delivery of this Report were approved under section 11(4)(b)(ii) by the Board of Directors of Purolator Holdings Ltd., being the governing body of the entity that controls each entity included in this Report.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in the capacity as a director and the President and Chief Executive Officer of Purolator Holdings Ltd., attest that I have reviewed the information contained in this Report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the 2025 reporting year.

DocuSigned by:

*John Ferguson*

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John Ferguson  
Director and President and CEO  
of Purolator Holdings Ltd.

May 14, 2026

I have the authority to bind the corporation.