



HEAD OFFICE
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TRAILCON'S COMMITMENT TO COMBAT MODERN SLAVERY

At Trailcon, we are committed to maintaining the highest ethical standards and expect all Trailcon employees, contract workers, and board members to consistently act with integrity and adhere to all relevant laws and regulations. Should any violations occur, we are committed to thoroughly investigating and addressing them.

OUR STRUCTURE & OPERATIONS

Trailcon is a leader in Canada's trailer and intermodal equipment rental, leasing, and service sector. With seven facilities across Canada and our head office in Brampton, Ontario.

Our core values guide our commitment to excellence in serving our clients every day. We are prepared to tackle any challenge and strive to exceed expectations.

- Upholding the highest standards is essential to us; we aim to deliver the best.
- Honesty and transparency are key in our interactions, fostering trust and building lasting partnerships.
- We focus on the collective growth of our team, always working to improve together.

We are committed to inclusivity and empowerment ensuring that every voice is heard and valued, creating a supportive environment for our team members and clients.

RISK DETERMINATION

We assess our risk level as low based on the fundamental nature and location of our business operations. Our focus on equipment leasing and rental involves minimal direct labor-intensive activities. Our service business relies on locally licensed technicians, significantly mitigating the risk of modern slavery, child labor or human trafficking practices within our organization. Furthermore, our comprehensive policies, training initiatives, and supplier management strategies provide additional layers of protection.

OUR FRAMEWORK & POLICIES

Strong governance is the essential foundation of a respectful and inclusive corporate culture that earns trust and builds value for our clients, employees, and communities. To protect individuals from modern slavery, child labor, and human trafficking, Trailcon has developed a series of policies and codes that form our framework for addressing these issues.

Code of Conduct

Our Code of Conduct is based on Trailcon's strong ethics and values. Ethical standards are key to the trust that underpins our relationships with management, coworkers, clients, and community members. We value our team members, and every employee contributes to our open, supportive, and ethical workplace culture. By adhering to Trailcon's expected standards of behavior, we ensure a safe and positive workplace for everyone.

The purpose of the Code of Conduct is to guide employees in carrying out their duties in an honest and ethical manner. It is crucial that all employees read and familiarize themselves with the Code to meet and maintain the

ethical standards of our organization. Employees must act with integrity and observe the highest ethical standards of business conduct in their interactions. While the Code cannot address every possible situation, it provides a baseline for honest and ethical decision-making.

All Trailcon management and employees are required to be familiar with the Code, comply with its provisions, and report any suspected violations. This would include reporting any instances or forms of modern slavery, including forced labor and child labor, occurring at any time in our operations or those of our suppliers and subcontractors.

Workplace Civility Policy

Trailcon values a culture of civility and respect in the workplace, free from harassment, discrimination, and violence. This Workplace Civility Policy supports our commitment to fostering and maintaining a healthy, safe, and caring work environment for all. Trailcon employees are to be treated with respect and dignity, without fear of discrimination, violence, or harassment from any employees, customers, suppliers, or clients.

Reporting and Compliance

To enforce these policies, Trailcon has established clear reporting mechanisms. Employees are encouraged to report any suspected violations of the Code of Conduct or Workplace Civility Policy. These reports will be reviewed and addressed promptly, confidentially and taken seriously. No employee who submits a complaint in good faith, or participates in the investigation of a report, shall suffer retaliation or an adverse employment consequence as a result of such submission or participation.

Supplier Risk Management

Trailcon is committed to maintaining a reliable, responsive and ethical supply chain. We source the vast majority of our supplies domestically and from suppliers with whom Trailcon has had a multi-year partnership. We place a strong emphasis on aligning our suppliers with our company values, ensuring that every partnership reflects our commitment to quality, sustainability, and ethical practices. To uphold these standards and foster continuous improvement, we conduct thorough reviews with our suppliers on a regular basis.

Continuous Improvement

Trailcon regularly reviews and updates our policies to ensure they remain effective and aligned with best practices and legal requirements.

By implementing and enforcing these policies, Trailcon demonstrates our unwavering commitment to ethical business practices, including the protection of individuals from exploitation.

STAFF TRAINING AND AWARENESS

At Trailcon, we are committed to equipping our workforce through our policies, training, and awareness programs. These initiatives are designed to empower our employees to uphold our commitment to ethical practices and create a safe and respectful workplace environment.



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1. Code of Conduct Signing for New Hires:

Every new hire is required to read and sign our Code of Conduct prior to starting their employment at Trailcon. This ensures that from day one, all employees are aware of our strong ethical standards.

2. Annual Performance Review Sign-Off:

As part of our annual performance review process, all employees must reaffirm their awareness and understanding of all Trailcon policies. This annual sign-off process reinforces our commitment and ensures continuous awareness.

3. Ongoing Communication and Updates:

We maintain open lines of communication to ensure all employees stay informed about any updates or changes to our policies. Regular bulletins and meetings are used to reinforce the importance of vigilance and ethical behavior in our daily operations.

4. Support and Resources:

Trailcon provides resources and support for employees to report any suspicions or incidents that violate our policies, confidentially. We are committed to taking immediate and appropriate action to address any reported concerns.

By embedding these practices into our organizational culture, Trailcon ensures that every employee is knowledgeable about and actively participates in our efforts to prevent unethical behaviour. Our commitment to awareness is a critical component of our broader strategy to uphold the highest ethical standards and protect the rights and dignity of all individuals.

EFFECTIVENESS ASSESSMENT & CONCLUSION

At Trailcon, we are dedicated to ensuring the effectiveness of our policies. To achieve this, we remain committed to assessing our policies that measure our success in upholding human rights principles. Through ongoing evaluation and analysis, we will continuously improve our approach to human rights, fostering a culture of accountability and integrity across our organization.



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APPROVAL AND ATTESTATION

This statement was approved by the board members of Trailcon Leasing Inc on May 30, 2024.

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities subject to the Canadian Act. 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.

A handwritten signature in black ink, appearing to read "M. Hollend", is written over a horizontal line.

Michael Hollend
Director, Trailcon Leasing Inc.

"I have the authority to bind Trailcon Leasing Inc."