

**Legislation:** *Fighting Against Forced Labour and Child Labour in Supply Chains Act*  
**Reporting Year:** 1  
**Period:** January 1, 2023 – December 31, 2023  
**Accountable Signing Authority:** Director

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## Company Overview

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “Canadian Act”), this statement outlines the measures implemented by Lineage Logistics Canada Holdings Ltd., a corporation formed under the laws of the Province of Ontario and its subsidiaries and/or affiliates that are reporting entities (collectively, “Lineage Canada”) to address the risks of modern slavery, including<sup>1</sup> within our operations and supply chain.

This report covers multiple affiliated entities as indicated below (as applicable):

- Lineage Logistics Canada Holdings Ltd. - Company #1000273881, Corporation
- Lineage Logistics VLS GP Ltd. - Company #1000506292, Corporation
- VersaCold Logistics Services – Business Identification #241205319, Limited Partnership
- VersaCold Logistics Services GP Limited – Company # 912556-6, Corporation
- Lineage Logistics ORS Ltd. – Company #5036499, Corporation
- Lineage Logistics ORS TRS LP – Business Identification # 301413548, Limited Partnership
- Lineage Logistics ORS TRS, GP Ltd. - Company #2799934, Corporation
- Lineage Logistics MVI Ltd. - Company #1176396969, Corporation
- Entrepôt Du Nord Inc. - Company #1145016847, Corporation
- 2957-8002 Quebec Inc. - Company #1142771527, Corporation
- Woodstock Cold Storage (1990) Ltd - Company #046463, Corporation
- Fundy Stevedoring Inc. - Company #625916, Corporation
- Bayside Canadian Railway Company Ltd. - Company #651558, Corporation

At Lineage, we actively uphold human rights and work to prevent any violation of others’ human rights through the policies and procedures we have established. Lineage’s primary value is Safe and it transcends everything we do at work. Our Code of Conduct takes our values and translates them to action and provides guidance on our shared responsibility to conduct business in a manner that complies with the law. In particular, the Code of Conduct requires all Lineage employees to follow applicable laws prohibiting human trafficking, employment discrimination, and forced, compulsory, and child labor. Lineage team members should choose to work with business partners who share our commitment to prioritize the safety, health and working conditions of all humans, as well as respecting fair labor laws, including wage and hour laws and prohibitions against forced, trafficked or child labor and our agreements with business partners require those partners to act in accordance with all applicable laws. Lineage employees must watch for signs of modern slavery in our facilities, as well as speak up about inhumane and/or unacceptable working conditions noticed with customers or vendors. Lineage fosters an environment that encourages speaking up and prohibits retaliation against team members who utilize our Speak Up resources. We are committed to establishing safe, inclusive, and respectful work environments wherever we conduct business. We value the fundamental rights of our employees and all who work within our supply chain, which encompass freedom from slavery and child labour, equal opportunities for all, a safe and healthy workplace, and freedom from discrimination and harassment.

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<sup>1</sup> As these terms are defined pursuant to section 2 of the Canadian Act.

Lineage continues to develop and expand our understanding of the risks associated with the complex issue of modern slavery and to identify areas within our operations and broader supply chain that may be impacted by such challenges. We collaborate across our business and supply chain to implement appropriate practices that mitigate and address potential risks.

Modern slavery is not tolerated within our organization and supply chains. Lineage acknowledges our responsibility to uphold the rights of individuals working for our organization, as well as those associated with suppliers and business partners who prioritize human rights for their own employees. Recognizing that human rights issues require multifaceted approaches, we consider it crucial to engage with all stakeholders to promote awareness and foster understanding.

## **Part I – Structure, Operations and Supply Chains**

### **Our Structure**

Lineage Canada are indirect subsidiaries of Lineage, Inc., a corporation formed under the laws of Maryland, USA which together with its subsidiaries (individually or collectively as the context requires, “Lineage”) is a global temperature-controlled warehouse and integrated solutions company. Lineage is headquartered in Novi, Michigan with a presence in the U.S., Canada, Europe and Asia Pacific. Lineage Canada is comprised of the following legal entities:

- Lineage Logistics Canada Holdings Ltd. – Company #1000273881, Corporation
- Lineage Logistics VLS GP Ltd. – Company #1000506292, Corporation
- VersaCold Logistics Services – Business Identification #241205319, Limited Partnership
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- Fundy Stevedoring Inc. – Company #625916, Corporation
- Bayside Canadian Railway Company Ltd. – Company #651558, Corporation

Lineage has more than 25,000 employees globally, with approximately 1,400 employees in Canada.

### **Our Operations**

Lineage temperature-controlled warehouses and global integrated solutions offer an all-in-one approach to handling products across the food supply chain. Lineage combines cold storage and transportation to streamline customer’s supply chain across storage, consolidation, brokerage, drayage services and more. Lineage Canada stores, handles, and transports temperature-controlled food products domestically and internationally for its customers. As of the date of this report, Lineage Canada operates temperature-controlled warehouses coast to coast in British Columbia,

Alberta, Manitoba Newfoundland and Labrador, Nova Scotia, Quebec, and Ontario, as well as various temperature-controlled transportation network throughout Canada.

## **Our Supply Chains**

Lineage Canada is a service provider to over 750 national and international customers and solely relies on the import and export information and instructions provided by our customers. This includes information associated to country of origin of the goods. When handling import or export goods on behalf of our customers, we ensure that we are compliant with the applicable Canadian laws and regulations, as well as those of the destination country, and the customer requirements as applicable. As Lineage Canada is not the importer or exporter of record for the goods it handles, we rely on the accuracy and trustworthiness of the information provided by our customers. Any noncompliance or deviation identified would be flagged and communicates to our customer or authorities as applicable.

## **Part II – Policies and Due Diligence Processes**

Lineage has a robust set of policies, codes, and procedures addressing its obligations to treat our team members, clients and suppliers with the highest possible level of dignity and respect, as well as our expectations that our contractors, vendors, and suppliers do the same. These expectations are set out in our internal Code of Conduct and will also be reflected in our working Supplier Code of Conduct, that will be finalized in 2024. Lineage also publishes a modern slavery statement annually in compliance with the United Kingdom’s Modern Slavery Act of 2015 and the Australian Modern Slavery Act of 2018.

Our policies and practices are guided by workplace safety laws, human rights laws, labour/employment laws, and international and industry-leading standards. Our corporate ethics and compliance team is working on finalizing and implementing a Supplier Code of Conduct in 2024, that will help ensure fair and ethical workplace standards across our supply chain and require compliance with forced labour and modern slavery laws. Lineage supports the goals of the Canadian Act and takes seriously our responsibility to act with due diligence to avoid infringing on the human rights of others and address any impact on human rights if they occur.

## **Internal Code of Conduct**

The Lineage Code of Conduct sets out our values and responsibilities on respectful, safe and healthy workplaces, a culture of inclusion and diversity, customers, safety, and the environment. Our Code of Conduct requires all Lineage employees to follow applicable laws prohibiting human trafficking, employment discrimination, and forced, compulsory, and child labor. Lineage team members should choose to work with business partners who share our commitment to prioritize the safety, health and working conditions of all humans, as well as respecting fair labor laws, including wage and hour laws and prohibitions against forced, trafficked or child labor and our agreements with business partners require those partners to act in accordance with all applicable laws. Lineage employees must watch for signs of modern slavery in our facilities, as well as speak

up about inhumane and/or unacceptable working conditions noticed with customers or vendors. Lineage fosters an environment that encourages speaking up and prohibits retaliation against team members who utilize our Speak Up resources. The Code of Conduct is managed by the global Compliance and Ethics department and is reviewed annually and updated as necessary.

### **Supplier Code of Conduct and Contractual Obligations**

Lineage intends to guide its supplier relationships by its Supplier Code of Conduct which will be finalized in 2024.

### **Reporting Process [e.g. Internal Integrity Helpline and/or whistleblower or complaints process]**

Lineage has an Ethics Hotline (and associated email address, phone number, and mailing address) and internal complaint procedures as part of its whistleblower program. Allegations of any breaches of our policies or any non-compliant and unethical matters are taken seriously. The Ethics Hotline is also made available to all third parties, including but not limited to suppliers, contractors, and consultants via <https://www.onelineage.com/ethics-compliance>. The Ethics Hotline can be used confidentially online, by email in several language (English, Spanish, German, Chinese, Dutch, French, Italian, and Vietnamese) or by calling a toll-free number to submit a report. Retaliation against anyone, including employees, customers, or other third parties speaking up in good faith is strictly prohibited as specified in our policies and Code of Conduct.

In addition to measures currently in place, we intend to implement a Supplier Code of Conduct in 2024. Should we determine a supplier is not in compliance with the Canadian Act, or uses, directly or indirectly, forced labour or child labour, we will notify the supplier of the breach and cease the working relationship until corrective action is put into place.

By putting in place these formal policies, codes of conduct for colleagues and suppliers, and comprehensive compliance and monitoring standards, Lineage actions its commitment to healthy, safe, and respectful working conditions throughout Lineage supply chain.

### **Our Due Diligence Processes**

Lineage has implemented a number of due diligence measures to ensure layers of review. As described above, our contracts with our business partners include clauses that require the business partners to act in accordance with all applicable laws.

### **Part III – Risks of Forced Labour and Child Labour in Operations and Supply Chains**

Our potential exposures to indirect association of modern slavery practices come through our business partners.

We expect all business partners, regardless of the cultural, social and economic context, to meet expectations of fundamental rights for all people. This means treating their employees with fairness, respect and dignity, and following practices that protect health and safety for the people working for them.

Lineage assesses low risk of forced labour or child labour in our supply chain. Lineage is not aware of any forced labour or child labour in our supply chain. Both statements are subject to the limitations of Lineage's risk identification activities as described in more detail above and below.

### **Part IV – Measures to Remedy Forced Labour and Child Labour**

Lineage is not aware of any incidents of forced labour or child labour in our activities or supply chain in our past financial year, subject to the limitations of our risk identification activities as described in more detail above and below. Accordingly, Lineage has not had to take any remedial measures in response to incidents of forced labour or child labour.

### **Part V – Measures to Remediate the Loss of Income to those Impacted by the Elimination of Forced Labour and Child Labour**

Lineage has not as of the date of this report become aware of any loss of income to vulnerable families resulting from our measures to eliminate the use of forced labour and child labour in our activities and supply chains.

### **Part VI – Training Provided to Employees**

In 2024, Lineage will provide a one (1) hour mandatory training to all Canadian based employees. The training will be developed and delivered by our external legal counsel and will cover the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

### **Part VII – Assessing Effectiveness of Actions against Forced Labour and Child Labour**


We recognize the need to implement effective measures to identify and mitigate the risk of forced and child labour within our operations and supply chains. We are currently examining how best to conduct these assessments.

We will review annually our reporting document and update as necessary to ensure that it reflects the emerging consensus on best practices to address these complex issues. We also will annually review our contracts with our business partners to ensure continued compliance and implement any improvements required to ensure we are accurately obtaining and retaining information from our external and indirect suppliers.

### **Attestation**

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 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.

By signing the below, I hereby confirm I have the authority to bind Lineage Canada as set forth below.

  
Brian McGowan (May 31, 2024 13:19 EDT)

May 31, 2024

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Brian McGowan  
*Director of:*  
Lineage Logistics Canada Holdings Ltd.,  
Entrepôt Du Nord Inc.,  
2957-8002 Quebec Inc.,  
Lineage Logistics ORS Ltd.,  
Lineage Logistics ORS TRS, GP Ltd. (on behalf of itself and Lineage Logistics ORS TRS LP)  
Lineage Logistics MVI Ltd.,  
Lineage Logistics VLS GP Ltd. (on behalf of itself and VersaCold Logistics Services)  
VersaCold Logistics Services GP Limited

\_\_\_\_\_  
Date

\_\_\_\_\_  
Annegien Kooij  
*Director of:*  
Woodstock Cold Storage (1990) Ltd.  
Fundy Stevedoring Inc.,  
Bayside Canadian Railway Company Ltd,

\_\_\_\_\_  
Date

\_\_\_\_\_  
Harld Peters  
*Director of:*  
Woodstock Cold Storage (1990) Ltd.  
Fundy Stevedoring Inc.,  
Bayside Canadian Railway Company Ltd.

\_\_\_\_\_  
Date

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Lineage Logistics MVI Ltd.,  
Lineage Logistics VLS GP Ltd. (on behalf of itself and VersaCold Logistics Services)  
VersaCold Logistics Services GP Limited

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Date

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Annegien Kooij (May 31, 2024 18:21 GMT+1)

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May 31, 2024

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Annegien Kooij  
*Director of:*  
Woodstock Cold Storage (1990) Ltd.  
Fundy Stevedoring Inc.,  
Bayside Canadian Railway Company Ltd,

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Date

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Harld Peters  
*Director of:*  
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Fundy Stevedoring Inc.,  
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Date



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Lineage Logistics VLS GP Ltd. (on behalf of itself and VersaCold Logistics Services)  
VersaCold Logistics Services GP Limited

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Annegien Kooij


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Date

*Director of:*

Woodstock Cold Storage (1990) Ltd.  
Fundy Stevedoring Inc.,  
Bayside Canadian Railway Company Ltd,

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H.J. Peters (May 31, 2024 19:09 GMT+2)

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May 31, 2024

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Harld Peters

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Date

*Director of:*

Woodstock Cold Storage (1990) Ltd.  
Fundy Stevedoring Inc.,  
Bayside Canadian Railway Company Ltd.