

MODERN SLAVERY ACT REPORT
OVERLAND WEST FREIGHT LINES LTD.

FYE 2025.12.31

Foreword

Overland West Freight Lines Ltd. (“OWFL”) is a corporation existing under the laws of Canada that is engaged in transportation and logistics. It imports equipment and parts for its fleet from suppliers within Canada and the United States. This report was prepared pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) with respect to OWFL’s import activities during the financial year ending December 31, 2025

OWFL has complied and remains committed to complying with all applicable laws, and continues to be dedicated to combatting modern slavery and child labour in all its forms in its business operations and supply chains.

Structure, Activities, and Supply Chains

OWFL offers over-the-road transportation solutions to customers in Western Canada, specializing in “less-than-truck-load” (LTL) transportation services. It operates 20 strategically-placed service centres across British Columbia, Alberta, The Yukon, and Northwest Territories, with its head office located in Winnipeg, Manitoba. OWFL has a large inventory of well-maintained equipment to support its operations. OWFL maintains a supplier list and all parts and equipment are sourced from established truck, trailer and parts vendors which are based in Canada and the United States.

Importation of trucks, trailers and parts is not a regular business activity since the trucks and trailers are diligently maintained and parts for maintenance are usually sourced within Canada. In 2024 it was determined that new trucks and trailers needed to be imported to update OWFL’s fleet. Actual importation of trucks and trailers started late 2024 and ended by March 2025.

Policies and due diligence processes in relation to forced labour and child labour in supply chains

OWFL is a federally regulated business within a highly regulated sector, complying with all applicable laws. Even though it does not produce or distribute goods, it is committed to ensuring that forced labour and child labour does not exist within the business. Special care is taken by OWFL’s Recruitment team during the recruitment and selection process to ensure that all drivers are legally entitled to work in Canada and that appropriate licensing arrangements are in place. This added scrutiny helps to mitigate the risk of forced labour and child labour and ensure fair business practices are maintained.

Further, OWFL’s complaint reporting system established as part of its Harassment Policy remains in place and continues to assist in identifying and reducing forced labour and child labour within the business and also in its import supply chain. Managers and supervisors are

required to investigate all reports of harassment and discrimination in any form. All employees of OWFL are required to adhere to the Harassment policy as a condition of employment.

OWFL specifically does not engage in the "Driver Inc." model for any of its Company Drivers or Owner Operators. OWFL strongly advocates against the Driver Inc. model, as research has shown that many new Canadians who are engaged in the Driver Inc. model come from vulnerable population groups and are not made aware of their own legal obligations under the Income Tax Act, as well as the requirement to hold and maintain appropriate insurance as outlined under associated provincial WCB legislation.

Business and supply chains risks

OWFL continues to ensure that it sources its equipment and parts from reputable and established truck, trailer and parts vendors within Canada and the United States where the business is highly regulated. Laws and regulations in Canada and the United States are already in place to prevent and mitigate the risk of forced labour and child labour. To date, OWFL has not come into any information about any of its suppliers being involved in forced labour or child labour.

With importation not being a regular business activity, and sourcing its trucks, trailer and parts from reputable suppliers within Canada and the United States, there is low risk that forced labour and child labour occurs in its import supply chain.

Remediation of any forced labour or child labour incidence

OWFL has not come into any information, at any time in the past, of any occurrence of forced labour or child labour in its supply chain. As such, there has been no need to take any remediation measures as contemplated in the Act.

Training provided to employees on forced labour and child labour

Because of the low risk exposure to forced labour and child labour in its supply chain under the circumstances mentioned herein, OWFL does not currently provide training to employees on forced labour and/or child labour.

Ensuring forced labour and child labour are not being used in its business and supply chains

OWFL remains diligent and responsive to government guidance on compliance standards, ensuring that its practices align with evolving regulations and best practices in combating modern slavery, including sourcing equipment and parts from reputable suppliers within Canada and the United States. With this approach, OWFL ensures that its strategies remain robust and continuously improve to combat modern slavery effectively.

Conclusion

This report is completed to fulfil the obligations of OWFL to report annually pursuant to the Act. OWFL is supportive of the Act to fight against forced labour and child labour. OWFL understands the importance of ongoing diligence and will continue to monitor its controls to ensure compliance with existing policies. OWFL continues to monitor and improve its procurement procedures and policies to ensure that they align with the requirements of the Act.

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 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. I am providing this attestation in my capacity as a Director and Officer of Overland West Freight Lines Ltd., and not in my personal capacity.

Name: James S. Reimer

Title: President & CEO

Date: May 25, 2026



I have the authority to bind Overland West Freight Lines Ltd.