

# **Oceanex Inc.**

Fighting Against Forced Labour and Child Labour in Supply  
Chains Act

Report for the fiscal year ending December 31, 2024

Dated May 31, 2025

## Introduction

This Report is filed in response to Oceanex Inc.'s reporting obligations under *Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"). It is the first such Report that Oceanex Inc. has filed. A copy of this Report is publicly available and has been posted on Oceanex Inc.'s website at [www.oceanex.com](http://www.oceanex.com) in accordance with the requirements of the Act.

### I. About Oceanex Inc.

Oceanex Inc. ("Oceanex") is a Canadian owned and federally regulated private corporation which is incorporated under the Canada Business Corporations Act ("CBCA") (Business Number 867892291RC0003) and must comply with the provisions of the Canada Labour Code. With its headquarters located in St. John's, NL, it is governed by a Board of Directors.

Oceanex is a vertically integrated intermodal terminal and freight transportation company, providing transportation service to/from the island of Newfoundland from points throughout North America. Notably, the majority of goods transported to the island originate within Eastern Canada. Oceanex controls the largest marine terminal in Newfoundland that handles containers and trailers and manages 100% of the container and trailer traffic into this terminal utilizing three vessels and a fleet of intermodal containers and trailers. Oceanex is a service-based transportation company and does not engage in the production, manufacturing, or distribution of any goods within the meaning of Act.

While Oceanex operations occur within Canada, from time to time its vessels are required to travel to shipyards outside of Canada for the purpose of undergoing required maintenance and drydocking.

Oceanex provides a year-round weekly service from any point in North America to Newfoundland:

Via Montreal, with two ships calling St. John's weekly;  
Via Halifax, with one ship calling St. John's weekly.

Oceanex handles any type of freight, any size, be it general or temperature-controlled cargo, roll-on, roll-off equipment, LTL shipments, containers ranging in size from 20' to 53', and any type of non-containerized freight, including dangerous goods and over dimensional cargo. Oceanex's fleet of vessels are Canadian registered cargo vessels and include the Oceanex Connaigra, Oceanex Avalon, and Oceanex Sanderling.

Through its extensive intermodal network, Oceanex provides door-to-door service and carries approximately half of all freight to Newfoundland. Its clients represent all sectors of the economy including retail, wholesale, building materials, project cargo, and consumer and industrial products. Oceanex uses its fleet of leased and owned NL based trucks and contracted road carriers for its road transportation network. These trucks and road carriers are registered to operate in and between provinces in Canada and as required to and from the U.S. to assist it in delivering goods for its customers. Additionally, on an as required basis, Oceanex contracts with CN to provide it with rail transportation services.

While Oceanex itself operates the marine terminal in St. John's where its vessels land for the purpose of loading and unloading cargo, at the Ports of Montreal and Halifax such terminal services are provided to it by QSL and PSA, respectively.

While the equipment used to service Oceanex vessels at the Ports of Montreal and Halifax is leased, owned, operated and maintained by QSL or PSA, as the case might be the equipment that Oceanex uses to service its vessels at the marine terminal it operates at the Port of St. John's is leased, owned, operated and maintained by Oceanex.

In addition to its headquarters in St. John's, Oceanex has offices in Mississauga, ON, Montreal, QC, Halifax, NS, as well as terminal operations in St. John's and Mount Pearl, NL.

Oceanex's fiscal year conforms with and ends on December 31 of each calendar year.

## II. Oceanex is an Entity that is Subject to the Act

While Oceanex is a private company and is not listed on any stock exchange, it has a place of business in Canada (indeed all of its places of business are in Canada). As per its consolidated financial statements, it has at least \$20 million in assets, revenue in excess of \$40 million as a result of sales of its transportation services, and regularly employs in excess of 250 persons as employees.

As such, it is an entity that is subject to and governed by the provisions of the Act.

## III. Oceanex Assets

To understand how Oceanex's supply chain works, it is necessary to understand something about the nature and types of assets that Oceanex owns or uses in relation to its operations, being:

1. Three (3) owned cargo vessels for marine operations;
2. A large inventory of flatbed trailers and chassis, including flat deck, open top, extendable flat deck and drop deck trailers for road/rail operations;
3. Over 2,500 containers of various sizes (20', 40' and 53') and types including dry, temperature controlled, heated and refrigerated containers, as well as containers capable of transporting liquid cargo for marine, road or rail related operations. Oceanex leases or owns the 20' and 40' containers it uses while it owns the 53' foot containers which comprises approximately 70% of its container inventory. The Oceanex fleet of 53' containers includes dry, heated, and temperature-controlled reefer units used for chilled or frozen cargo.
4. The cranes used to load and unload containers from its vessels in St. John's are all owned by Oceanex. It also owns a number of yard tractors, forklifts, and service vehicles, as well as reachstackers used for terminal cargo handling operations.
5. The fleet of owned and leased trucks based out of St. John's are used for its road transportation network to pick up and deliver goods and cargo by road transport throughout Newfoundland.

All of Oceanex's office space referenced in this Report, including the terminals in St. John's and Mount Pearl, is leased. Office furniture at these sites is owned by Oceanex while office equipment is either owned or leased.

The only land owned by Oceanex is a parcel of raw undeveloped land located on the outskirts of St. John's, NL that was purchased for possible future development as a staging area and terminal site in relation to its transportation services.

## IV. The Oceanex Supply Chain

Oceanex has a highly developed supply chain. To support its operations, Oceanex must source and procure goods such as:

- fuel and lubricants that it uses in its cargo vessels, trucks, cranes, yard tractors, service vehicles and forklifts
- personal protective equipment
- office furniture
- office equipment
- office supplies
- consumables of all types including foodstuffs and kitchen, accommodation and living quarters related supplies

Such items would all be sourced in Canada from Canadian suppliers.

Oceanex generally has a policy and practice of “buying Canadian” when the goods and supplies its needs for its operations are available in Canada. In certain cases however Oceanex had to buy and order products from outside Canada that are not readily available in Canada. This includes specialized parts for its cargo vessels and certain of its equipment (its cranes at its St. John’s Terminal that are not available in Canada) and parts and supplies for existing equipment and systems on its vessels and the cranes it uses at its St. John’s Terminal in that if not replaced with parts from the original supplier of the same would either be incompatible or void existing warranties on the same.

Oceanex vessels requiring these parts and supplies were constructed at shipyards outside of Canada, with the newest having been built in Germany in 2013 and the oldest in Japan more than 40 years ago. Occasionally, mechanical equipment and parts must be sourced from European suppliers. Canadian suppliers are used for the supply of company owned or leased trucks, yard tractors, service vehicles, reachstackers, and forklifts. Oceanex cranes used at its St. John’s terminal were manufactured in Austria or Germany and sourced from Germany.

The chassis and trailers that Oceanex owns or leases were mainly sourced from Canadian suppliers; however, some were sourced from US suppliers. The containers owned or leased by Oceanex would have been sourced from suppliers located in Canada, the U.S., or China with the majority of Oceanex’s owned 53’ containers having been manufactured and sourced in China. As well, replacement containers for those owned Oceanex containers and new purchased additional 53’ containers continue to be ordered from China, with the most recent acquisition of 234 such 53’ containers having been supplied and delivered for their Chinese manufacturer in 2024. That supplier is the same supplier and company that Oceanex has been doing business with for over 20 years and is the supplier that has manufactured and supplied to Oceanex all of the 53’ containers that it has acquired from China.

When sourcing vessels and equipment, Oceanex considers factors such as price, availability, quality, reputation and reliability of the supplier or manufacturer. Whenever possible, goods and/or services are acquired from Canadian suppliers. However, warranties, parts availability, and the specialized nature of some of the equipment may at times require purchase of same from foreign suppliers, primarily Germany, Sweden, and Denmark. This would generally apply to parts for the vessels and cranes that were not manufactured in Canada including engines, shafts, propellers and propulsion systems.

Under Canadian law, cargo vessels like those that Oceanex uses in its operations must undergo mandatory inspections or dry dockings at set intervals or as needed for immediate repairs. In addition to commercial terms, Oceanex selection of shipyard is often based on availability and ability to complete the required work. Furthermore, as Canadian shipyards cannot always accommodate Oceanex vessels, it is not unusual for Oceanex to enter into contracts with suppliers (i.e., shipyards and suppliers of parts and services related to that survey and/or other work being done) that are outside of Canada related to major refurbishment, repair & quadrennial survey work, although Oceanex’s preference is when they are competent, proximate available and competitive is to use Canadian shipyards for such work.

Oceanex is a company that observes all laws and regulations that are applicable to it. It monitors the activities of its suppliers, especially those that are located outside of Canada to ensure that they comply with all laws and regulations that are applicable to them.

## V. Measures Taken in Response to the Act

Honesty and integrity, observance of human rights and applicable laws, fair dealing with staff and all those it deals with, including its customers, are key pillars in the corporate ethos of Oceanex. Likewise, it expects all those it deals with and does business with to behave similarly in dealing with their staff and others and to also ensure that those in their supply chains behave in such a manner.

While Oceanex has not identified evidence that any of its suppliers are engaging in the use of forced labour and child labour, it recognizes the risk of such issues particularly when procuring containers from international suppliers located in countries where concerns have been raised related to the use of forced or child labour. In keeping with the requirements of the Act Oceanex has taken certain concrete measures and steps to ensure that it and its employees meet its obligation under the Act. The following section will outline what Oceanex has done to address the Act's requirements and deal with and mitigate risks associated with such procurement activities.

### *Oceanex's Methodology of Approach*

Building on the approach we reported on in last year's report Oceanex has tasked a Team led by its General Counsel and Quality Management Lead to oversee the ongoing and continuing implementation of the measures, also reported on in last year's report, that Oceanex continues to build upon.

This group (which consists of Oceanex's General Counsel, Quality Management Lead, Procurement Manager and administrative staff) was empowered and directed to take on this work by Oceanex's Executive Vice President. The measures that they have taken and are taking in this regard have the full support of Oceanex's Executive Chairman and the Board of Directors and shareholders of Oceanex, who reviewed and have ratified and adopted this report, as they did last year's report, and who are aware of the obligations of Oceanex and all persons who work for Oceanex and of their obligations as directors and shareholders to ensure that Oceanex adheres to all laws that are applicable to it, including the Act.

Reflective of that commitment on the part of Oceanex and of the importance it ascribes to ensuring that it and its employees adhere to and observe the requirements of the Act is the direction that was sent and given to all Oceanex employees on May 30, 2024 shortly after Oceanex filed and just before it posted its first Fighting Against Forced Labour and Child Labour in Supply Chains Act Report:

"Dear Colleagues:

As you may know, Canada passed the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") last year.

This Act applies to federally regulated companies like Oceanex that exceed a certain size. Its purpose is to enlist the support of companies like ours in eradicating forced labor, child labor, slavery, and human trafficking in their supply chains. Additionally, the Act ensures that all suppliers of goods and services to companies like Oceanex comply with applicable employment and minimum wage laws.

Oceanex is fully committed to ensuring that it adheres to the provisions of the Act and has implemented policy measures and practices to assist in doing so.

After May 31, 2024 you will be able to view what Oceanex has done in this regard by reading a copy of our first Report to the federal Minister of Public Safety which will be posted on our website [www.oceanex.com](http://www.oceanex.com).

To help us fulfill our obligations under the Act, we ask that if, as an Oceanex employee, you become aware of any situation through your own observations or information from any source (including the media, social media, or the internet) where you believe that a person or entity supplying goods or services to Oceanex, or someone in that supplier's supply chain, is or may be engaging in the use of forced labor, child labor, slavery, human trafficking, or may not be observing applicable employment or minimum wage laws, please report your concern. You can do this by sending an email to our General Counsel, [ ] and our Quality Management Lead, [ ], who are copied on this email. They will investigate the basis of your concern and work with me to determine the appropriate Oceanex response."

Where Oceanex finds any such concern is justified, that supplier will be subject to having any supply contracts they have with Oceanex suspended and/or terminated and to being removed from our list of approved suppliers on a go forward basis.

In keeping with that direction, Oceanex, led by this group, with the support of Oceanex's Senior Management and Board of Directors and shareholders has continued to build on the work that we reported on in last year's report. Our focus and Methodology of Approach being to:

- Continues to do what is necessary to ensure we are in compliance with the Act;
- Ensure adherence to the measures we have put in place to address our obligations as a company under the Act to mitigate against and not engage in our supply chain any entity that engages in the use of forced labour and child labour in its or our supply chain and non-compliance with applicable labour and minimum wage laws and, within reason, to determine if any entity in our supply chain is engaging in such practices;
- to develop a list of those entities who were on Oceanex's approved suppliers list and to determine the identity of all those entities in Canada and outside of Canada who had supplied Oceanex with goods and/or services since January 1, 2023;
- As part of our own quality assurance initiatives and commitments under the Act:
  - to engage in an ongoing process of education of company staff about the Act, our obligations under it and Oceanex's expectations of the role its employees, particularly those involved or who may be involved in the procurement of goods and services when it comes to ensuring adherence of Oceanex's obligations under the Act;
  - monitor and periodically on a yearly basis or more frequently, if required review the policies and procedures we have put in place to ensure we are effectively meeting our obligations under the Act and as and when necessary either in response to such a review or to changes in the Act or its reporting requirements to revise the same; and
- Continue the implementation of Oceanex's action plan in relation to the same.

## *2024 Implementation and Compliance Measures*

### Education and Training

Building on the work that it did in 2023, Oceanex led by its General Counsel and Quality Management Lead conducted a total of ten (10) orientation/training sessions for 64 staff members involved in procurement. The purpose of each of these training sessions was to make staff aware of:

- the obligations that devolve on Oceanex under the Act as a regulated entity that is subject to its provisions.
- the steps that Oceanex has taken to implement its obligations under the Act.
- the changes that Oceanex has made to its policies and procedures to bring it into compliance with the Act.
- the expectations of Oceanex staff in relation to assisting Oceanex in fulfilling its obligations under the Act, and in assisting in wiping out the evils and harms arising as a result of the use of forced and child labour in the supply chain and non-observance by anyone in it of applicable labour and minimum wage laws.

Training sessions were held on April 30, May 2, May 27, November 27, and December 16, 2024.

Staff were specifically schooled in obligations incumbent upon them to ensure as part of their expected day to day duties:

- that "... Oceanex's supply chains remain untainted by modern slavery, forced labor and child labor. .."  
[and of Oceanex's "... commitment [ ] to adhering to all relevant laws and regulations, including the

Fighting Against Forced Labour and Child Labour in Supply Chains Act and Customs Tariff amendments.;

- to in keeping with Oceanex Acquisition Policy POL 023, based on their own observations and knowledge and learnings of supplier's and supplier's supply chains, using their own abilities and the tools that Oceanex has directed them to use, i.e., the declarations Oceanex has required staff to obtain and suppliers to Oceanex to provide as a condition provide and suppliers to continue to adhere to as a condition of being and remaining an Oceanex supplier to assess and report risk of non-compliance to Oceanex's General Counsel and Quality Management Lead and to not source or continue to source goods and services from any non-compliant supplier;
- to in all instances ensure that the Declaration Re the Use of Child Labour & Modern Slavery that is appended to Oceanex's Acquisition Policy which contains and requires positive affirmations that that supplier:
  - has not been and is not engaged in any practices involving the use of child labour, forced labour, the exploitation of vulnerable people or human trafficking
  - will permit Oceanex to audit any such supplier, including to attend at its facility(s) for such purposes to ensure compliance
  - will answer any questions related to the same whether in relation to an Oceanex inquiry, investigation or audit;
  - agrees that if such supplier fails to comply with the above any contract with it may be suspended, pending satisfaction of Oceanex's requirements or have its supply contract(s) with Oceanex terminated and either not be added to or be removed from Oceanex's approved supplier list; and
  - and not engage any supplier that does not comply with the same.
- to adhere to Oceanex's Supplier Qualification Policy FM-160-092, insofar as it related to the Qualification of Suppliers, including related to ensuring they meet and continue to meet Act's and Oceanex's requirements related to not engaging in use of forced or child labour and observing all applicable employment and minimum wage laws adhering as conditions for being or becoming an Oceanex supplier. Specifically, not to engage any person or entity as an Oceanex supplier until they meet the conditions of Oceanex's Acquisition and Supplier Qualification Policies including those prescribed by Oceanex in its policies and procedures related to not engaging in use of forced or child labour and observing all applicable employment and minimum wage laws. And further, not to engage any person or entity as a supplier of goods and services to Oceanex, until Oceanex's Procurement Manager, the person who has been tasked by Oceanex under its Supplier Qualification Policy as the central gatekeeper for has advised them that they are an approved Oceanex supplier and to cease to do business with any such supplier as Oceanex's Procurement Manager advises has been removed from Oceanex's qualified supplier list.

Further to the above and the direction of Oceanex's Executive Vice President, staff were also reminded of the key role they play in ensuring Oceanex's policies and procedures are adhered to and in advising Oceanex's General Counsel and Quality Management Lead of any observed or suspected instances where they believed an Oceanex supplier or someone else in that supplier's supply chain may have been involved in and in assisting in any investigation of audit(s) conducted with respect to the same.

Those who received this orientation and training were also advised of the changes that Oceanex had made to the Oceanex Standard Terms and Conditions Related to Supply of Goods and/or Services by Sellers FM 160-204. These are the terms and conditions that apply to every purchase order issued by Oceanex for the supply of goods and/or services. These conditions under Oceanex policies and procedures may only be varied, where circumstances warrant with the sign off on any such variation by the Oceanex Vice President whose are the supply comes under and Oceanex General Counsel on the recommendation of Oceanex's Procurement Manager and staff involved

with the procurement. Those terms and conditions require each and every supplier of goods and/or services to Oceanex to warrant and agree that they do not engaged in any practices involving the use of child labour, forced labour, the exploitation of vulnerable people or human trafficking ("slavery and human trafficking") and further that its employees and agency workers are paid in compliance with all applicable employment laws and minimum wage requirements applicable to where they work and that they are in compliance with the same. They also require each supplier having such a contract by purchase order to have in place measures and to take reasonable steps to prevent slavery and human trafficking and the use of child labour in connection with its business and in relation to the businesses and suppliers that are part of its supply chain. They make it clear that in any case where Oceanex believes or determines this is not the case that Oceanex may:

- make inquiries or conduct an investigation or audit regarding any such matter; and
- either suspend or terminate its contract with any such supplier that does not appropriately respond to any inquiry, cooperate with any investigation or audit or is found by Oceanex to be in breach of its forgoing obligations.

Personnel trained were advised that it was the case as of the date of their training and would continue to be the case that not waivers of the obligations contained in this term and condition of Oceanex's Standard Terms and Conditions Related to Supply of Goods and/or Services by Sellers had been granted. Further that none would ever be granted. For to do so would put Oceanex offside with its obligations under the Act. This was the case for 2024 and continues to be the case.

Those who received training were also advised and reminded that in those other cases where goods and/or services were acquired, not using a purchase order but pursuant to a different form of contract of supply, any such contracts would contain a clause that requires any such supplier to comply with all applicable laws, including Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, including providing a binding contractual declaration and commitment to do so and/or a prohibitive clause prohibiting the use of modern slavery, forced labor and child labor and non-observance of applicable employment and minimum wage laws.

The vast preponderance of all contracts for the supply of goods and/or services to Oceanex with its suppliers in 2024, as was the case in 2023 and as continues to be the case now. Of those contracts for the supply of goods entered into in 2024 and since that time all such contracts have associated with them declarations and/or contractual clauses of the sort referenced above.

All Oceanex staff who completed this education and training were required to sign an Acknowledgement that they had done so and reviewed and understood the policies and procedures concerned, which forms a part of their personnel file.

All staff were also informed that if they had a question at any time concerning the Act, or Oceanex's obligations under it or in relation to any matter pertaining to the same, their work or any particular situation relating to it were they felt they needed advice, that they should and could contact Oceanex's Quality Lead Manager and/or Oceanex's General Counsel to seek an answer or guidance pertaining to any such matter.

In addition to the above referenced personnel the ten (10) members of Oceanex's Senior Management Team who were called upon to review and approve these policies and the members of Oceanex's Senior Management team generally at various information sessions and interactions with General Counsel, the Quality Management Lead and Procurement Manager related to the same informed and oriented regarding Oceanex's obligations under the

Act and likewise concerning the procedures and practices Oceanex has in place to ensure adherence to those obligations.

Likewise, in addressing their obligations in considering and approving last year's report and now this year's report and filing the director's and shareholders of Oceanex based on their review of the same and information provided to them by members of Senior Management were educated and oriented regarding their obligations under the Act.

In keeping with Oceanex's commitment to ongoing training of its personnel, both under the Act and its policies commencing in June of this year Oceanex intends to do refresher training for all those who have participated in training and orientation sessions. As and when new staff involved with procurement are added Oceanex will as part of its onboarding process of such staff be providing them with access to the policies and procedures that are relevant to the conduct of their duties, including specific orientation and training with respect to Oceanex's policies and obligations and expectations of employees with respect to compliance with the Act.

### Building on Oceanex's 2023 Initiatives

As stated in last year's report, Oceanex has put in place a number of policies and procedures and practices to ensure that it is complying with its obligations under the Act.

In addition to the measures contained and included in Oceanex's Acquisition Policy, Supplier Qualification Policy, and Standard Terms and Conditions Related to Supply of Goods and/or Services by Sellers, and implementing the education and training measures discussed above, Oceanex also amended its Supplier Qualification Monitoring and Control Policy OP-007. It did so to include measures to ensure that established corporate practices exist as a part of the monitoring and control mechanisms it has put in place to include a reference to the fact that every vendor as a condition of becoming an Oceanex supplier is required to provide a signed declaration during the supplier qualification process demonstrating they have taken and will take reasonable steps to prevent slavery and human trafficking and the use of child labour in connection with its business and in relation to the businesses and suppliers that are part of their supply chain as per the terms and conditions of Oceanex's Acquisition Policy and Supplier Qualification Policy, which are referenced in it. It is pursuant to this policy that Oceanex's Quality Management Lead and Procurement Manager conduct schedule and as determined to be required targeted audits of various Oceanex suppliers to determine if they are in compliance with conditions of supply applicable to them as Oceanex suppliers, including those applicable to determining if such audited suppliers are in compliance with the obligations incumbent on them as Oceanex suppliers under the Act related to the declarations and contractual commitments they have made as Oceanex suppliers to be in compliance with the same. Pursuant to this policy short of conducting an audit Oceanex also reviews its supplier for their compliance with all of the terms and conditions that apply to them as approved suppliers to Oceanex, both periodically and on an ongoing basis.

Oceanex in keeping with the Act's requirements through the work of its Procurement Manager and all of its staff who are involved with procurement in 2024 took and continues to take appropriate measure pursuant to Oceanex's above referenced policies and procedures to ensure that Oceanex and its suppliers are acting in conformity with the Act's requirements.

At the end of May 2024 when we filed our First Fighting Against Forced Labour and Child Labour in Supply Chains Act Report when then reported in that Report that "... since January 1, 2023, some 595 suppliers located within Canada and 34 suppliers located outside Canada had supplied Oceanex with goods and/or services."

We also in that report identified that, "In 2023, less than 1% of the goods and services that i[Oceanex] procured

in the running of its business were provided by suppliers based outside of Canada.”

Based on our study of this matter and learnings that issues with respect to the use of child labour, forced labour, the exploitation of vulnerable people or human trafficking non-adherence to applicable employment laws and minimum wage requirements can arise in Canada and in supply chains originating in Canada just as they can in supply chains outside of Canada we made a strategic decision to treat all suppliers of goods and/or services to Oceanex alike though we are conscious of and do continue to be vigilant and monitor supplies to the extent we obtain the same, which we mainly do not, from any country where the United Nations and other reputable NGOs and the Canadian and other governments and media report such issues exist.

In 2024 we identified that we had a total of 773 suppliers located in Canada and 81 located outside of Canada, while In 2024, less than 4.5 % of the goods and services that we procured in the running of our business were provided by suppliers based outside of Canada. These related to the purchase of 53% containers and material related to cyclical maintenance and repairs for Oceanex 3 vessels and upcoming 2025 and 2026 drydockings

Building on the work that initiated in 2023 that was reported on in Oceanex’s 2023 Fighting Against Forced Labour and Child Labour in Supply Chains Act Report in 2024. in response to a request from Oceanex 268 suppliers, including all of our suppliers located outside of Canada, who were requested to do so completed a declaration in the form requested by Oceanex attesting that:

“The undersigned as an entity that supplies, has supplied or will supply goods and services to Oceanex (as the case might be) represents and warrants that:

- it has not been and is not engaged in any practices involving the use of child labour, forced labour, the exploitation of vulnerable people or human trafficking ("slavery and human trafficking");
- its employees and agency workers are paid in compliance with all applicable employment laws and minimum wage requirements applicable to where they work and are not in violation of the same;
- it has taken and will take reasonable steps to prevent slavery and human trafficking and the use of child labour in connection with its business and in relation to the businesses and suppliers that are part of its supply chain;
- when requested by Oceanex Inc. to do so the undersigned shall demonstrate to Oceanex that it has acting in accordance with the representations and warranties given in this Declaration at all times in relation to the performance of its obligations as a supplier of goods and/or services to Oceanex;
- that the undersigned agrees to respond to all reasonable requests for information required by Oceanex for the purpose of completing the annual report as required by Canada’s Fighting Against Forced Labour and Child Labour in the Supply Chain’s Act;
- the undersigned will permit Oceanex and its third party representatives, on reasonable notice during normal business hours, but without notice if there are reasons to suspect an instance of slavery or human trafficking, or otherwise as part of an Oceanex audit of it as a supplier to Oceanex Inc. to audit the undersigned’s obligations under this Declaration and provide access to its premises, copies of its records related to its supply to Oceanex and cooperate with Oceanex’s conduct of any such audits;
- If Oceanex has reasonable belief that the undersigned has had any involvement with slavery and human trafficking or the use of child labour, including in its supply chain, Oceanex shall have the right to terminate any supply arrangement it has with the undersigned immediately on notice to the undersigned.”

Further pursuant to Oceanex’s above referenced revised in force Supplier Qualification Policy all new suppliers to Oceanex as part of their onboarding with Oceanex as suppliers have as part of the Supplier Qualification process

that they go through before becoming an Oceanex supplier have been required to sign an identically worded declaration.

As stated previously in Oceanex 2023 Fighting Against Forced Labour and Child Labour in Supply Chains Act Report as part of the action plan that Oceanex put in place to ensure its compliance with the Act Oceanex has caused Oceanex's Standard Terms and Conditions Related to Supply of Goods and/or Services by Sellers to be amended to include since 2023 a new term and condition in all of the purchase orders that it issues with respect to the supply of goods and/or services contain a condition that states:

"The Seller [i.e., Supplier] represents and warrants and covenants with the Buyer [i.e., Oceanex]:

- i) it has not been and is not engaged in any practices involving the use of child labour, forced labour, the exploitation of vulnerable people or human trafficking ("slavery and human trafficking");
- ii) its employees and agency workers are paid in compliance with all applicable employment laws and minimum wage requirements applicable to where they work and are not in violation of the same;
- iii) it has taken and will take reasonable steps to prevent slavery and human trafficking and the use of child labour in connection with its business and in relation to the businesses and suppliers that are part of its supply chain.
- iv) that it has no reason to believe and no knowledge that any of the suppliers in the Seller's supply chain are engaging in or have been engaged in any of the practices referred to in subparagraphs i) and/or ii) of this paragraph g);
- v) that in any instance where the Buyer has reason to believe that the Seller or any one in its supply chain may be in violation of the warranties contained in this paragraph g) it will respond to the Buyer's reasonable inquiries related to the same;
- vi) that the Seller recognizes that the Buyer may, at any time, choose by way of an audit of the Seller to determine if the Seller or anyone in its supply chain is in compliance with its provisions of this paragraph g) in which case the Seller will permit or facilitate access by the Buyer to the Seller's premises and facilities and operations and those in its supply chain for such a purpose;
- vii) that where the Seller fails to promptly respond to the Buyer's reasonable inquiries under subparagraph v) of this paragraph or to an audit request made under paragraph subparagraph vi) of this paragraph g) the Buyer may by notice in writing or given electronically by email either suspend its contract with the Seller until compliance is had and/or terminate its contract of supply with the Seller.
- viii) that where the Buyer determines that the Seller or anyone in the Seller's supply chain is in violation of the Warranties contained in this paragraph g) the Buyer may and will on notice given in writing or electronically by email terminate its contract of supply with the Seller in which case the same shall be at an end."

As was stated earlier in this report, the vast preponderance of Oceanex contracts of supply of goods and/or services are subject to and governed by purchase orders containing such conditions.

Where they are not Oceanex pursuant to its Acquisition Policy has put in place measure to assure that such contracts contain a clause that requires any such supplier to comply with all applicable laws, including Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, including providing a binding contractual declaration and commitment to do so and/or a prohibitive clause prohibiting the use of modern slavery, forced labor and child labor and non-observance of applicable employment and minimum wage laws.

On this basis, Oceanex is satisfied that it has put in place the contractual measures and sought the requisite

declarations and representations from its suppliers to establish the required contractual framework related to its contracts of supply of goods and/or services when combined with the other measures that it has and is taking to enable it to comply and be able to comply with its obligations under the Act to mitigate risk and address any instances where it believes, suspects and/or determines that a supplier or someone in a suppliers supply chain is engaging in use of forced or child labour and/or not observing applicable employment and minimum wage laws.

Those other measures training and educating and empowering all Oceanex staff, and particularly those involved in procurement of goods and/or services for Oceanex about the Act, Oceanex's obligations under the Act, Oceanex's expectations, including reporting expectations where something gives rise to a concern, of them as employees, and about the policies and procedures that Oceanex and they must follow to ensure Oceanex meets and continues to meet those obligations. Beginning as well with the statement of unequivocal support for this initiative from Oceanex's Executive Vice President for the initiatives Oceanex has undertaken and the ongoing involvement of other members of Oceanex's Senior Management Team, including its General Counsel in overseeing this initiative.

Related to the matter of whether any Oceanex employee reported a matter to Oceanex's General Counsel and/or Quality Management Lead giving rise to a concern that an Oceanex supplier or prospective supplier might be engaging in the use of forced or child labour and/or not observing applicable employment and minimum wage laws, Oceanex can state as follows. No such instances were reported to Oceanex's General Counsel and/or Quality Management Lead in the 2024 reporting year which required an inquiry or investigation to be made into the actual or suspected the use of forced and child labour in the supply chain and non-observance by anyone in it of applicable labour and minimum wage laws by Oceanex supplier, prospective supplier or by any person or persons in any such supply chain. This stated, as a part of its continuing education and training of staff, Oceanex will remind all staff of this expectation.

## Oceanex's Action Plan

Oceanex as part of its ongoing action plan to comply with its obligations under the Act will continue to orient and train new employees, particularly those involved with or who may be involved with procurement regarding Oceanex's obligation under the Act, and its related policies and procedures and expectations of such employees, while also providing periodic updates and refresher training for all of its employees who are involved with procurement related activities for Oceanex.

In keeping with the policies and procedures that it has adopted Oceanex will not qualify any entity or person as a supplier of goods and/or services that refuses to or that does not comply with the policies and procedures that it has put in place to comply with Oceanex's obligations under the Act.

It will investigate any instance where it has reason to believe or suspect that a supplier or a person or entity involved in a supplier's supply chain uses forced and child labour and/or does not observe applicable labour and minimum wage laws.

It will suspend and ultimately terminate its contract(s) of supply with any supplier that does not respond promptly to its inquiries or any investigation or audit Oceanex chooses to conduct into that supplier's compliance with its contractual commitments to Oceanex regarding satisfying Oceanex that any such supplier or anyone in that supplier's supply chain does not use forced and child labour or is not operating in compliance with applicable labour and minimum wage laws.

It will disqualify any supplier that does not comply with its contractual commitments regarding the non-use of forced and child labour and complying with applicable labour and minimum wage laws and not do business in future with any such person.

Regarding audits, audits are one of the tools as referenced in its policies and procedures, including its Acquisition

Policy and Supplier Qualification Monitoring and Control Policy that Oceanex uses and will use to enable it to determine if its suppliers are acting in conformity with their contractual commitments regarding the non-use of forced and child labour and complying with applicable labour and minimum wage laws. In 2024 Oceanex selected 3 of its major suppliers as entities to be audited to determine their compliance with the forgoing requirements: one in China, the entity that manufactured and supplied to it the 234 53' containers referenced earlier in this Report; another in Europe, being the supplier of parts for the engines and propulsion systems in a number of Oceanex cargo vessels; and the third being a Canadian based supplier of equipment (chassis) by long and short term leases to Oceanex. In the case of the first audit of the Chinese entity, it is complete. On the basis of that audit, Oceanex's Procurement Manager and Quality Management Lead determined that supplier to be acting in compliance with its contractual obligations to Oceanex. In the case of the second and third audits referred while they are still ongoing and the results of the same will be reported on in next year's report, nothing concerning regarding either such entity has arisen as a result of their contractual commitments to Oceanex or the audit inquiries that Oceanex has made to date.

In 2025 Oceanex will continue to follow the processes that it has in 2024 with respect to determining compliance by its suppliers with their contractual commitments to Oceanex regarding not using forced and child labour and observing applicable labour and minimum wage laws so that Oceanex may continue to meet its obligations under the Act.

In all that it does in this regard, Oceanex will strive to be ever vigilant and to act proactively in dealing with any changes in the Act or its requirements or any circumstances that come to its attention related to the use of forced and child labour and non-compliance with applicable labour and minimum wage laws by anyone in its supply chain.

As it did since the Act came into effect, and it put the policies and procedures and measures referenced in this Report in place Oceanex will continue to monitor supplier behaviour to ensure their and its compliance with the requirements of the Act.

Pursuant to the action plan it developed in 2023, Oceanex will continue to audit selected suppliers to ensure compliance with the Act and their obligations to Oceanex. Should Oceanex determine or find any forced labour or child labour situations exist in their supply chains, it will promptly take action to address the same. It will also report the same to the Minister of Public Safety and authorities having jurisdiction over such matters so that they may be aware of any such situation and take appropriate actions to investigate and deal with any such matters in their own right. To the extent that it is able Oceanex will cooperate with and provide any information it has related to any such matter or investigation.

Should Oceanex as a result of any circumstance find any measure to be necessary to remediate a loss of income to vulnerable families as a result of a breach of the Act by someone in its supply chain necessitating it to develop or be part of a remediation plan, Oceanex will report any such situation to the Minister and Canadian authorities having jurisdiction over that matter and work with them to develop and implement any required plan of remediation.

As a Canadian with a history of always acting in accordance with applicable laws and doing what is right, Oceanex is committed to doing what it can to assist Canada in eliminating the use of forced or child labor and non-observance of applicable employment laws and minimum wage laws by anyone in its supply chain and to ensuring suppliers appropriately and properly comply with labor and minimum wage laws..

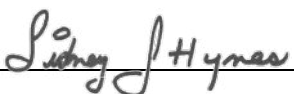
Further to its commitment to do so, Oceanex will continue to evolve and refine its processes to meet its legal obligations under the Act.

## 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 listed above, being Oceanex Inc., as have the other members of the Board of Directors. 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.

Full name: Sidney J. Hynes  
Title: Executive Chairman of the Board of Directors of Oceanex Inc.  
Date: May 30, 2025

Signature:

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I have the authority to bind Oceanex Inc.