 Genesee & Wyoming Canada Inc.	<h2 style="text-align: center;">Modern Slavery Statement</h2> <p style="text-align: center;">Joint Report of Genesee &amp; Wyoming Canada Inc. and Quebec Gatineau Railway Inc.</p>	<p style="text-align: right;">Version No: 02 Approved By: Andrew Creighton</p>
Created Date: April 10 <sup>th</sup> , 2024	Last Revision Date: May 28 <sup>h</sup> , 2025	Printed Date: May 31 <sup>st</sup> , 2025

## FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT REPORT May 28, 2025

### 1. Introduction

This report (this “**Report**”) is made jointly by Genesee & Wyoming Canada Inc. (**HOLDCO**) and the Quebec Gatineau Railway Inc. (**QGRY** and together with HOLDCO, **GWCI**) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act), for the period starting on January 1st, 2024, and ending on December 31, 2024 (reporting period).

This is GWCI’s second report under the Act.

GWCI continues to recognize that the risks of forced labour, child labour and human trafficking are complex and evolving, and we are working to reduce these risks in our businesses. GWCI is committed to operating in a lawful manner with high ethical standards.

### 2. Our structure, operations and supply chains


HOLDCO was incorporated in Quebec, Canada, and operates under the laws of Canada. HOLDCO owns short line railways in Canada, including the Quebec Gatineau Railway, that transport freight and provide ancillary rail-related services in Canada. Its head office is located in Montreal, Quebec. HOLDCO and its subsidiaries employ over 460 employees across Alberta, Ontario, Quebec, Nova Scotia, and Newfoundland and Labrador. Striving to be more than just an expert rail freight services operator, HOLDCO’s railroads are recognized for a strong safety culture and a commitment to being good corporate citizens who make a positive contribution to society.

The QGRY is a short line railway company operating in Quebec, Canada. QGRY is wholly owned by HOLDCO and both have common executive management and directorships. This team provides corporate direction, oversight, and risk management across the HOLDCO structure. Through the common executive managers and directors, and external advisors, HOLDCO and QGRY were engaged in the consultation process for this joint report to verify that the operations and processes meet applicable legal requirements.

QGRY runs on a 450 km (280 miles) track that was formerly part of the Canadian Pacific Railway. The line connects several key locations including Quebec City, Trois-Rivières, Laval, Lachute, and Gatineau (formerly Hull). QGRY was acquired by HOLDCO, a subsidiary of Genesee & Wyoming Inc., in 1997. The QGRY serves as a crucial link in the region’s transportation infrastructure, facilitating the movement of goods and contributing to the local economy.

The core strengths of QGRY are multiple connections with Class 1 railroads (CN and CPKC), flexible operations, long term partnership with its main customers and multiple storage and transload locations. The ~135 employees working at QGRY serve a diverse mix of customers shipping more than 36,000 carloads containing Metallic Ores (Alumina), Paper, Chemicals and Plastics, Metals and Minerals and Auto.

GWCI’s main supply chain comprises a mixture of government entities, multi-national or national companies and local supplier partners that provide products or services. GWCI’s suppliers are based in the U.S., Canada and Germany.

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### 3. Policies and Due Diligence Processes

GWCI maintains policies and procedures that serve to promote the highest ethical standards, including an annual Code of Conduct certification, all of which serve to reduce the risk of forced labour and child labour in our supply chains. In 2024, GWCI introduced an Anti-Modern Slavery and Human Trafficking policy and new training under the Act. In 2024, GWCI also expanded our Hotline to specifically reference forced labour and child labour reporting. The Hotline is a channel for safe and, if desired, anonymous communication for reporting on issues related to ethical or unlawful behavior. The Hotline is for administrators, employees, business partners including third parties and suppliers. Any complaint is carefully analyzed by our Human Resources department or Legal Department, as appropriate, with a focus on guaranteeing the independence and integrity of the process.

GWCI is proud of our culture and values, and our executive management team is highly engaged daily, which ensures the business meets the needs and compliance of all stakeholders. GWCI will continue to have our procedural controls and reviews in place to keep this risk low.

### 4. Risks of forced labour and child labour in GWCI operations and supply chains

GWCI completed an internal risk assessment in 2024 of forced labour and child labour. The assessment included an examination of the industry we operate in, screening of suppliers, applicable policies, training, supply chain management, risk identification and management, reporting and internal accountability, and a third-party risk assessment.

Based on the results of this internal risk assessment, GWCI found minimal risk of forced labour and child labour in its operations and supply chains as GWCI has policies, procedures and practices in place to ensure that our business remains legally compliant, ethical, and in accordance with human rights standards and applicable law.


Employees are and have been subject to policies and procedures that ensure they are treated, and treat each other, with fairness, respect and dignity, in accordance with applicable laws. Also, the risk is further assessed as low due to the high compliance and high regulatory nature of the rail industry in Canada and in Quebec, both of which ensure that suppliers are assessed by senior management prior to any engagement. Finally, the risk is further reduced by having no international suppliers who are in countries that have been identified to be high risk for forced labour or child labour.

### 5. Actions taken to remediate, assess and address forced labour and child labour risks

GWCI has not identified any forced labour or child labour in its business activities or supply chains and has thus not identified any loss of income to vulnerable families resulting from measures taken by GWCI to eliminate the use of forced labour or child labour in its business activities or supply chains. We strive to use our influence to address any issues that we may discover in the future.

### 6. Training provided to employees on forced labour and child labour

GWCI provides an annual Code of Conduct certification which establishes practices and standards that address human rights, including specifically addressing forced labour and child labour. In 2024, GWCI provided training to senior leaders that enhances further awareness of the risks of forced labour and child labour in our supply chains, with the goal of supporting the eradication of forced labour and child labour within the GWCI supply chain.

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Additionally, Board members and senior management representatives were invited in 2024 to attend a webinar titled [Canada's Modern Slavery Act: How to Enhance Workplace Safety and Supply Chain Integrity Canadian Occupational Safety \(thesafetymag.com\)](#), to increase their awareness of forced labour and child labour impacts on those involved and on the community. The webinar provided practical insights on how to enhance workplace safety and supply chain integrity regarding the Act. This information has continued to be utilized to inform making decisions on prospective suppliers and customers.

## 7. Assessing the effectiveness of actions taken

GWCI acknowledges that forced labour and child labour risks may be present in our operations and supply chains. GWCI has undertaken various steps to address these risks, including promoting our reporting Hotline and reviewing our policies and business practices to ensure they reflect our commitment. We believe we have achieved the goal of creating awareness within our senior and supervisory roles of potential forced labour and child labour risks.

## 8. Approval and Attestations

This statement was approved by the Board of Directors of each of GWCI and QGRY on **May 28, 2025**, in accordance with Section 11(4)(b)(i) 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 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 purposes of the Act, for the reporting year listed above.

Andrew Creighton  
President – Genesee & Wyoming Canada Inc. (GWCI)  
President – Quebec Gatineau Railway Inc. (QGRY)



I have the authority to bind both GWCI and QGRY