

MODERN SLAVERY REPORT

1. INTRODUCTION

This report on modern slavery (the “Report”) is made on behalf of The CSL Group Inc. and certain of its subsidiaries (collectively “CSL”, “we” and “our”) pursuant to the Canadian *Fighting Against Force Labour and Child Labour in Supply Chains Act* (the “Act”), for the financial year ending March 31, 2025 (the “Reporting Period”). It also constitutes a statement under the Australian *Modern Slavery Act 2018* (Cth), the United Kingdom *Modern Slavery Act 2015* and the Norwegian *Transparency Act*, which contain provisions against modern slavery, child labour, servitude, forced or compulsory labour and human trafficking, including provisions for the protection of victims.

CSL is dedicated to upholding the highest ethical standards across its global operations. CSL strictly prohibits modern slavery, child labour, human trafficking, and any form of forced labour. We consider the respect of human rights to be a fundamental corporate responsibility and a value governing all our activities. As part of its comprehensive corporate social responsibility program, which is integral to its business strategy, CSL has implemented various policies and procedures to promote ethical behaviour, ensure safe working environment, and uphold fair labour practices.

This Report outlines the actions we initiated and continue to evaluate for effectiveness, along with new measures being implemented to further ensure that slavery, human trafficking, child labour and any other form of forced labour are not taking place in its supply chains or in any part of its business.

2. STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

STRUCTURE

CSL is a Canadian-based privately owned shipping company with headquarters in Montréal, Canada. CSL employs a total of approximately 1,500 employees worldwide, both onboard ships and ashore. CSL has affiliate offices conducting business globally through its Canada, Americas, Europe, Australia, Asia and transshipment operating divisions.

ACTIVITIES

Together with its subsidiaries, CSL is a leading provider of marine dry bulk cargo handling and delivery services. It is also the world’s largest owner and operator of self-unloading vessels, carrying cargoes such as iron ore, coal, aggregates, grain, salt and sugar for industries ranging from construction and steel to energy and agri-food.

SUPPLY CHAIN

As a vessel owner and operator, CSL contracts with both local and international suppliers for products, parts and services. This includes engaging international crewing providers to crew vessels under CSL management. CSL sources raw material, parts, equipment and consumables from both European-based and international suppliers and from time to time, CSL outsources technical vessel management to third parties.

3. POLICIES AND DUE DILIGENCE

CSL's Code of Corporate Responsibility (the "Code") sets forth CSL's standards of integrity and expectations for ethical behaviour. The Code affirms CSL's commitment to respect human rights, provide fair and competitive employment conditions, promote equal employment opportunity, treat employees fairly, comply with applicable laws and regulations, and provide a clean, healthy and safe work environment. It also affirms CSL's commitment to conduct business as a responsible corporate member of the society. To comply with applicable laws, and to uphold high ethical standards wherever it operates, CSL promotes the application of its Code in its interactions with suppliers. For example, by including compliance clauses that promote sustainable procurement practices in its contracts with suppliers. These clauses cover a range of important issues, including privacy of personal data, information security, modern slavery, sanctions, and anti-corruption. CSL's President and Chief Executive Officer is responsible for initiating and supervising investigations into alleged violations of the Code, and the results of the investigations are reported to CSL's Board of Directors. During the Reporting Period, CSL updated its Code to specifically include provisions prohibiting modern slavery, child and forced labour in its Code, reinforcing its commitment to ethical business practices and human rights.

More broadly, CSL is committed to strictly complying with national and international human rights laws and recognizes its responsibility to respect human rights principles as set out in the International Bill of Human Rights and the International Labour Organization's Declaration of Fundamental Principles and Rights at Work. CSL also actively supports the ten principles of the United Nations Global Compact.

To further CSL's commitment to ensuring its supply chain reflects its strong commitment to the principles of sustainable development, CSL signed up to the IMPA Act, a not-for-profit program founded by the International Marine Purchasing Association (IMPA). The IMPA Act is a marine management program that seeks to align marine purchasers and suppliers with internationally accepted principles of Corporate Social Responsibility (CSR) through focusing on sustainable and ethical supply chain management. CSL has codified its practices within its own internal policies and procedures. Also, where CSL contracts with crewing agencies for the provision of vessel crews, CSL's Safety Management System stipulates that only crewing providers who have current certification under the Maritime Labour Convention ("MLC") can be engaged. The MLC provides measures to guarantee minimum age requirements, minimum wage requirements and welfare requirements of crew are maintained. Each crewing provider must obtain annual certification under the MLC to ensure compliance, and CSL completes checks annually to ensure ongoing compliance.

4. SUPPLY CHAIN RISKS

CSL considers as low the risk of forced labour or child labour in countries where it operates. Even if CSL recognizes that the industry may be subject to potential abuses, more specifically towards seafarers, such as extended working hours and overtime, poor working conditions (mental harassment, fatigue and lack of rest and sleep), lack of food and drinking water, CSL works with like-minded suppliers, with whom it has been doing business for many years and who operate in countries with high measures of protection for employees. CSL supply chain is also governed by the International Association for Classification Societies and Transport Canada requirements for approved vendors and suppliers. For this reporting year, CSL has conducted an evaluation of one of its supplier's workers' working conditions and welfare.

5. REMEDIAL MEASURES

CSL encourages its employees, customers and the public to report any violations of CSL's policies and commitments. Reports of any suspected violations can be made for anonymously and confidentially online or by telephone anywhere in the world through EthicsPoint, an independent third-party reporting system. Any reports of violations received through EthicsPoint are promptly investigated and addressed. During the Reporting Period, CSL has added modern slavery and child labour as a specific reporting category within the EthicsPoint reporting system. A link to CSL's Modern Slavery Report has also been added to EthicsPoint for easy access by employees, customers and the public.

The number and types of complaints received, violations identified and instances where corrective actions were taken are published annually in CSL's Corporate Sustainability Report (the "Sustainability Report"). The Sustainability Report also outlines the steps taken and progress made by CSL during the previous years to promote ethical business practices in its operations, as well as the action it intends to take going forward to ensure CSL continues to uphold high ethical standards in all aspects of its business.

6. LOSS OF INCOME

CSL believes that the most vulnerable families have not incurred any loss of income as a result of the measures it has taken to eliminate the risk forced or child labour. However, we acknowledge the direct impact our operations have on the communities in which we operate and embrace our responsibility to give back and act as a catalyst for positive change. We firmly believe that business success is not only measured by financial achievements. It encompasses a broader commitment to creating lasting value on communities and the environment.

Our approach emphasizes building strong community relationships founded on trust, respect, and collaboration. Through our partnerships and philanthropic endeavours, we strive to enhance the wellbeing of individuals living and working in the areas we serve. We aim to forge a brighter and more resilient future for all through our active efforts to promote environmental sustainability and support the diverse social and cultural needs of communities.

7. TRAINING

CSL ensures that all employees are aware of, educated on and comply with policies, laws and ethical conduct. All CSL shoreside employees are required to read, understand, and annually certify their compliance with the Code and to report any violations that come to their attention.

In addition, CSL is an active member of the Maritime Anti-Corruption Network ("MACN"), a global business network dedicated to the vision of a corruption-free maritime industry that enables fair trade for the benefit of society as a whole. MACN anticorruption training ("Stand your Ground, be a Leader") is provided to all vessel operations staff and captains. Shoreside employees receive annual integrity training to increase their awareness of the dynamics and impact of corruption, and to provide them with the tools and insights necessary to identify and address risks. Specific training is also provided to operations and procurement staff to reinforce the importance of CSL's anti-corruption program, the emphasis on appropriate due diligence practices, and CSL's zero tolerance for corruption in any form.

8. EFFECTIVENESS ASSESSMENT

CSL expects its suppliers to have a zero-tolerance policy in regard of force labour or child labour in all their facilities and business activities and within their entire supply chain. To assess effectiveness, we rely on information provided by our employees, clients, suppliers, and member of the community. We intend to continue to assess and refine our policies and procedures and so improve our approach to human rights.

No instances of modern slavery, child labour, servitude, force or compulsory labour or human trafficking involving our suppliers were identified by CSL's monitoring procedures during the Reporting Period.

9. OUR CONSULTATION AND GOVERNANCE PROCESS

In preparing this Report, CSL consulted key areas of its organization, including, Global Strategic Procurement, Internal Audit, Finance, Human Resources, Legal, Risk and Sustainability functions. These teams work across our organization, including across the subsidiaries to which this Report applies. This exercise has supported CSL's efforts to continue to contribute to the restoration and preservation of fundamental human rights worldwide.

10. APPROVAL AND ATTESTATION PURSUANT TO SECTION 11 OF THE CANADIAN ACT

This statement was approved by the Members of Board of Directors of The CSL Group Inc. on April 16, 2025, and will be approved by the Board of CSL Europe Limited in June 2025; CSL Australia PTY Ltd, Auscan Holdings PTY Ltd in July 2025; CSL Norway AS and CSL Norse Holdings AS in September 2025.

In accordance with the requirements of the Act, and in particular with subparagraph 11 (4)(a) thereof, we attest that we have reviewed the information contained in the report for the entities listed above. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in the report is true, accurate, and complete in all material respects for the purpose of the Act, for the reporting year listed above.

We have the authority to bind The CSL Group Inc.

(s) Louis Martel
President and Chief Executive Officer

(s) Paul Martin
Chair of the Board of Directors
