

<b>Policy:</b>	Modern Slavery	<b>Policy Reference and Revision Number:</b>	HR 032 Rev 000
<b>Department:</b>	Human Resources	<b>Effective Date:</b>	11/2/2023
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## Purpose

Modern slavery, defined as when an individual is exploited by others, for personal or commercial gain, including slavery, servitude, forced or compulsory labor, debt bondage and human trafficking, is a violation of human rights. BWC Terminals (together with its subsidiaries, the “Company”) has a zero-tolerance for modern slavery in any form and we expect the same from our contractors and suppliers.

Through our policies and business practices, we are committed to combatting the risk of modern slavery occurring within our business and we expect the Company, our contractors, and suppliers to not accept any goods or services from anyone involved in modern slavery or human trafficking.

## Policy

We are committed to the wellbeing of all our employees, contractors, customers, community members, and other stakeholders. We endeavor to conduct our business in a socially and environmentally responsible manner, respecting the law and universal human rights to benefit the communities where we work. The Company has zero-tolerance for the use of slave labor in our business and we will not knowingly do business with contractors, subcontractors, business partners or vendors who violate these practices or the human rights of those working on their behalf. We expect the same zero-tolerance approach from those who undertake work on our behalf and these expectations are set out in the Company’s Supplier Code of Conduct. This policy is reviewed at least annually and includes oversight by the Company’s Board of Directors (the “Board”).

Our commitment to combatting modern slavery is also underpinned in other Company policies such as our Code of Conduct and Ethics; Anticorruption Policy; Equal Employment Opportunity, Violence Free Workplace, and Harassment Free Workplace. An important aspect of accountability and transparency is broad access to a mechanism to enable individuals to voice concerns in a responsible, risk-free and effective manner when they discover information that they believe may show wrongdoing. The Company therefore provides access to an anonymous hotline (available 24 hours a day, seven days a week), available to any stakeholder of the Company to report any concern, including those which may relate to modern slavery.

We require contractors, suppliers, and service providers to adhere to all applicable domestic laws and encourage them to conduct their business in a manner consistent with core labor principles, including the elimination of forced and compulsory labor and the abolition of child labor. These expectations are communicated through a variety of channels, including relevant contracts and the Company’s policies and procedures. We expect our employees, suppliers, and contractors to always adhere to the letter, spirit and intent of these expectations and values.

The Company also undertakes due diligence with respect to material contractors and suppliers, tailoring the nature and extent of the due diligence carried out on various areas/units of our business, contractors and supply chain depending on the geographical location of those operations, and the potential level of risk of modern slavery, human trafficking, and other breaches of human rights in those locations. In addition, where we deem appropriate, we have the contractual right to audit and inspect various parties in our supply chain to ensure that the high standards we adhere to are reflected in the operations of such suppliers. The Company

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continues to explore opportunities to enhance human rights due diligence as they apply to suppliers and contractors.

In relation to our own business operations, the Company maintains robust employment policies and procedures. We seek to enable our people to perform well, feel motivated and thrive in a safe and positive work environment. We deliver training to our employees and, where appropriate, Board, to ensure that our people are aware of the health, safety, quality, and environmental risks in our business, and understand how best to manage the risks associated with each of these areas.

As human rights risks for the business community are identified and expectations evolve, the Company intends to adapt its capabilities and systems to address new challenges and opportunities in order to maintain its ongoing commitment to respecting human rights.