Fighting Against
Forced Labour and
Child Labour in
Supply Chains Act

About TransLink

South Coast British Columbia Transportation Authority ("TransLink") together with our partners, stakeholders, and operating companies (BC Rapid Transit Company Ltd., Coast Mountain Bus Company Ltd., West Coast Express Ltd., and Metro Vancouver Transit Police), plans and manages the Metro Vancouver region's multi-modal transportation system. Home to 2.5 million residents, TransLink's service area covers 1,800 km², 21 municipalities, one Electoral Area, one Treaty Nation, and nine Indigenous Nations. We're dedicated to creating a sustainable transportation system that meets the needs of customers, residents, businesses, and goods movers.

Our Vision, Mission, and Values

A better place to live built on transportation excellence.

Our Mission

Together, we connect the region and enhance its livability by providing a sustainable transportation network, embraced by the communities we serve.

Our Values

We are committed to the following pillars that support our vision and mission.

As outlined in TransLink's Sustainable Procurement Strategy, our supply chains play a critical role in helping TransLink and the region be more sustainable. TransLink strives to do business with suppliers who are committed to ethical labour, health and safety, environmental, and social principles. TransLink's Strategic Sourcing & Contract Management (SS&CM) has developed the Sustainable Procurement Strategy, which will stimulate the economy and innovation potential of the regional and global supply chain. The Strategy will help us create a more sustainable transportation system while supporting economic development and the environmental and social objectives of the region.

About this report

This is TransLink's third report on the steps taken during the fiscal year of January 1, 2025, to December 31, 2025, to prevent and reduce the risks of forced or child labour in our supply chains. This report has been prepared in accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act SC 2024, c 9 (the"Act")*. This report covers the TransLink entity and our wholly owned subsidiary entities identified above.

Structure & Activities

Organizational Structure

TransLink's operating companies are included in this report:

Coast Mountain Bus Company Ltd. (CMBC)

As the largest operating company in the integrated TransLink enterprise, CMBC serves customers in Metro Vancouver, the largest single transit service area in Canada. CMBC operates more than 96 per cent of the region's bus service delivering nearly 107 million service kms yearly through a fleet of clean-fuel conventional buses and zero-emission trolley buses. Passenger ferry service across Burrard Inlet via the SeaBus is also operated by CMBC.

British Columbia Rapid Transit Company Ltd. (BCRTC)

BCRTC, on behalf of TransLink, maintains and operates two of the three SkyTrain lines in Metro Vancouver (Expo Line and Millennium Line). SkyTrain is one of the longest fully automated, driverless, rapid transit systems in the world serving approximately 350,000 passengers per weekday with an on-time service delivery performance rating of 96.5%.

West Coast Express Ltd. (WCE)

WCE is a commuter rail service that has been serving the lower mainland since 1995 with more than 2.6 million boardings per year. Every weekday customers get on and off WCE at one of eight stations going to and from Downtown Vancouver and Mission. Depending on ridership service runs up to 5 trains made up of between 3 to 10 bi-level cars. WCE operates Monday to Friday during peak commuter times.

TransLink Security Management Ltd. (TSML or MVTP)

Mandated by the Minister of Public Safety and Solicitor General as a Designated Policing Unit in 2005, Metro Vancouver Transit Police (MVTP) aims to prevent crime and offences against the law (including the Criminal Code), aid in the administration of justice, and enforce the laws of British Columbia on the transit system. It is the first dedicated transit police service in Canada and oversight is provided by an independent Transit Police Board.

Activities

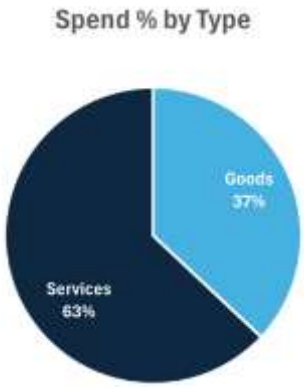
TransLink and its operating entities are incorporated under the laws of the Province of British Columbia, and primarily engaged in the transportation industry, planning and managing Metro Vancouver region's multi-modal transportation system.

TransLink and its operating entities ("TransLink Enterprise") are governed by individual boards. The TransLink Board of Directors is composed of seven individuals appointed by the Mayors' Council (from a candidate list presented by the Screening Panel), the Mayors' Council Chair and Vice-Chair (at their option), and up to two members appointed by the Province.

As of the fiscal year ending December 31, 2025, TransLink and its operating entities (consolidated) had assets of $12,518 million, sales of $2,733.8 million, and approximately 9,653 employees.

Our supply chain and understanding risks of child and forced labour

The TransLink Enterprise strives to do business with suppliers who are committed to ethical labour, health and safety, environmental, and social principles. Our supply chains facilitate the sourcing and delivery of materials, goods, services, and construction necessary for the TransLink Enterprise and play a critical role in helping TransLink and the region be more sustainable.



The TransLink Enterprise has about 768 direct suppliers and 1,568 service providers. Approximately 99% of our supply chain spending is in Canada and the United States. The majority of our spending is on services/construction (approximately 63%). Examples of services include 3rd party transportation service providers, planning, engineering, design, technology, maintenance services, and construction. The remaining 37% of spend is on

non-services (vehicles, goods, materials, fuel, and equipment) procured or delivered from the US or Canada. Some examples of the goods, materials, and equipment we procure include rail, railway machinery & equipment, bus parts and equipment, trolley poles, wires, electrical equipment, office furniture and supplies.

Policies and Due Diligence Processes

To uphold our commitment to human rights and fighting forced and child labour across our supply chains, we reviewed our policies and procedures and undertook the following proactive steps to manage supply chain risks:

Through a review of fiscal 2025 contract spending with direct suppliers, we further enhanced our **understanding of the risks of forced and child labour in our supply chains.** This review considered factors such as suppliers with multi-tiered business models with third parties (limited visibility into upstream practices), the category and type of materials procured, including goods produced in sectors with higher risks, and countries of operation and origin, particularly jurisdictions associated with inherent forced and child labour risks.

We continued to **strengthen our procurement processes** by embedding **TransLink's Supplier Code of Conduct** directly into our procurement policy. In addition, **a searchable goods index was developed and applied** to easily identify goods that may be at risk for forced and child labour. **Due diligence processes for supplier evaluation were further enhanced** by expanding our library of ethical questions supporting improved identification and assessment of supply chain risks of forced and child labour, supplier working conditions, and visibility into suppliers' upstream supply chains. These enhancements support greater insight into the maturity and practices of higher spend suppliers across the TransLink Enterprise and help identify areas where further supplier engagement may be required in the future.

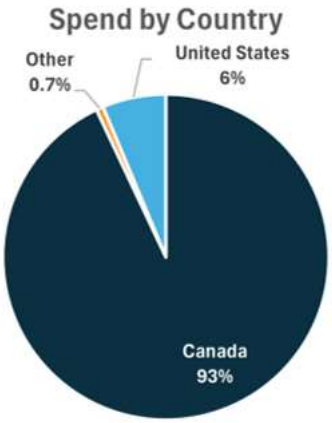
We **continue to improve our understanding and knowledge of forced and child labour risks** by engaging with peer agencies, subsidiaries, key suppliers, and companies in the sustainable procurement community of practice to exchange information and share best practices. These efforts support ongoing awareness across the TransLink Enterprise and within our supplier community of our approach to identifying, assessing, and managing forced and child labour risks.

Risk Assessment

A risk assessment of TransLink's industry of operation, goods procured and countries where goods are procured from has been performed over material direct suppliers. Material direct suppliers for the purpose of this reporting are those suppliers that make up the top 90% of procurement spend.

This risk assessment used two separate indices to conclude on the inherent risk of child and/or forced labour related to goods and countries - Walk Free's Global Slavery Index 1and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor (TVPRA List).2 The TVPRA List is a robust and credible framework that draws on extensive international evidence and is currently the most effective reference available for identifying and assessing supply chain risks related to forced and child labour.

[1] https://www.walkfree.org/global-slavery-index/
[2] List of Goods Produced by Child Labor or Forced Labor | U.S. Department of Labor (dol.gov)

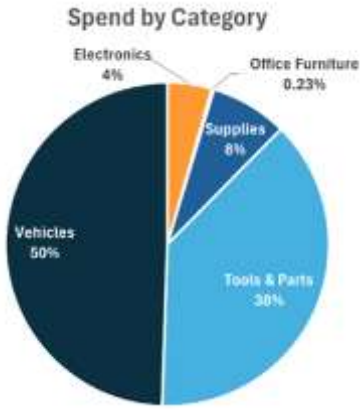


Industry of Operations

The TransLink Enterprise operates within the transportation industry, which is associated with a high risk of child labour or forced labour according to the two indices.

Countries Goods are Procured From

For countries of origin, 93% of suppliers are based in Canada, 6% are based in the US, while the remaining percentages are from other countries (with Italy being the largest), all of which are low risk countries per the Global Slavery Index by Walk Free Organization and the US Department of Labour.



Goods Procured

Per the 2024 List of Goods Produced by Child Labour or Forced Labour published by the U.S. Department of Labor's Bureau of International Labor Affairs, electronics procured by TransLink fall within the extreme-risk category. Electronics represent 4% of material direct spending. Vehicles account for approximately 50% of TransLink's procurement of goods that are made using inputs identified on the TVPRA List. However, all vehicle vendors currently contracted by TransLink maintain ESG policies and procedures that include supply-chain due diligence.

Overall, we have assessed the risk of forced or child labour in the TransLink Enterprise direct supply chains to be low, with potential risk primarily associated with the electronics and vehicle categories. These goods are sourced from distributors in Canada and US, which may be indirectly sourced by distributors from higher-risk jurisdictions.

Remediation of Forced Labour or Vulnerable Family Income Loss

To date, the TransLink Enterprise is not aware of any suspected or actual instances of forced or child labour in our supply chains. Should any such instances arise, we will promptly investigate and take appropriate action. We are committed to continual review of our policies and processes in relation to this Act and engaging with suppliers and industry peers as best practices in preventing forced and child labour evolve.

Awareness Training

Since 2023, TransLink has conducted awareness training on the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* for senior leadership and key functions across the enterprise and is planning refresher sessions in 2026. As part of TransLink's Sustainable Procurement Strategy, this training was expanded to include supply chain staff across the TransLink Enterprise, strengthening awareness and accountability within procurement activities. Previous participants included TransLink's CEO, Acting CFO / VP – Financial Services, CIO, General Counsel, Associate General Counsel, BCRTC President & General Manager, as well

as finance and supply chain leaders. This training provided an overview of the Act and other similar laws around the world, the definition of forced and child labour, and its forms, along with some examples of child and forced labour both globally and in Canada. The training also provided a snapshot of how modern slavery looks like recently, including statistics of how many people are suffering from modern slavery around the world. The training also talked about the common key drivers of forced and child labour such as the absence of rights, lack of physical safety, poverty and inequality, criminality, and corruption, among others.

Assessing Effectiveness

In fiscal year 2024, we developed a self-assessment dashboard as an internal accountability process in relation to forced and/or child labour. In fiscal year 2025, this dashboard was used to support the regular review of TransLink Enterprise policies and procedures related to forced and child labour. While the assessed risk for forced and child labour within the TransLink Enterprise remains low, 2025 activities also focused on advancing a structured approach to supplier engagement. This included developing plans to investigate and potentially work with our Canadian and US-based suppliers, where the majority of procurement spend occurs, to better understand and assess upstream procurement practices and any inherent risks of goods, particularly electronics and vehicles, that may be indirectly sourced for higher-risk jurisdictions. These activities support our commitment to the ongoing and continual assessment of forced and child labour risks within our supply chain.

Conclusion

As this Act is still considered new, we continue to raise awareness in respect to the Act within the TransLink Enterprise and our suppliers. We have introduced proactive steps to manage risks in our supply chain, are developing and maturing our assessment and internal accountability processes, and expanding training as part of TransLink's Sustainable Procurement Strategy initiatives and actions planned for 2026. We are committed to collaborating with our suppliers, peer agencies and others in the sustainable procurement practice in our efforts to reduce or eliminate risks of forced and child labour in our supply chains.

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 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 the purposes of the Act, for the reporting year listed above.

I have the authority to bind:

Original signed by Allan Seckel, Board Chair

Allan Seckel
Board Chair

Date: March 25, 2026