

Statement on Fighting Modern Slavery

Introduction

ONroute is committed to building safe and ethical environments in our communities and earning our guests' trust by being transparent and doing what's right. We are committed to operating in environments where human rights are protected and respected.

Modern slavery, encompassing forced labour and child labour, as well as human trafficking, contradicts our ONroute values. We aim to work with suppliers, vendors, service providers and contractors ("**Suppliers**") that share similar values and goals.

We unequivocally oppose slavery and human trafficking within our organization and our Suppliers' operations. Upholding the highest standards, we expect ONroute employees and Suppliers to demonstrate integrity and adhere to the laws, regulations, and rules in all jurisdictions where they operate. Instances of failing to meet these expectations will be thoroughly reviewed and addressed.

This report has been prepared in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Modern Slavery Act"). This report is based on the financial year ending on December 31, 2024.

ONROUTE Corporate Structure and Activities

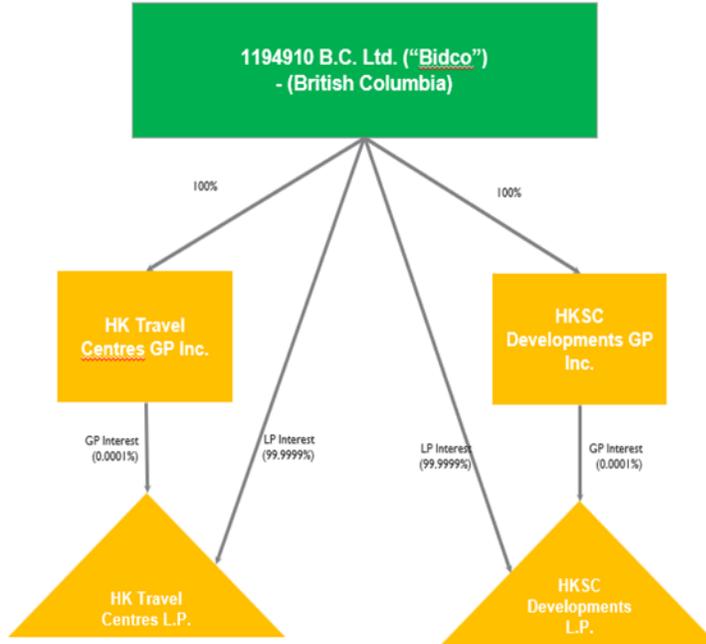
Headquartered in Mississauga, Ontario, ONroute is composed of two operating entities – HK Travel Centres L.P. and HKSC Developments L.P. Both are limited partnerships organized under the laws of Manitoba.

HK Travel Centres GP Inc., a corporation incorporated under the laws of Ontario, is the general partner of HK Travel Centres L.P. and executes documents via its officers/directors on behalf of HK Travel Centres L.P.

HKSC Developments GP Inc., a corporation incorporated under the laws of Ontario, is the general partner of HKSC Developments L.P., and executes documents via its officers/directors on behalf of HKSC Developments L.P.

ONroute is an Ontario-based business with a 50-year concession to operate 23 highway rest areas in Ontario along Highway 400 and Highway 401 until 2060. It operates the brands/franchises in its plazas and also owns and operates a convenience store in each plaza. ONroute has over 1,500 employees across the province.

The diagram below sets out ONroute’s ownership structure:



ONroute Supply Chain

ONroute sources products, including but not limited to food, beverages, packaging, cleaning supplies, equipment, furniture, technology hardware, small wares, signage, uniforms, toys and plush merchandise. In many cases, these goods are branded, and the applicable brand or franchisor mandates their purchase. ONroute purchases these goods either directly from the supplier or through distribution centres across Canada. In other cases, such as purchasing construction materials and fixtures, ONroute will source the product directly.

The manufacturing and production of ONroute’s direct suppliers is primarily carried out in North America. However, ONroute also sources goods from Australia, New Zealand, China, Japan, Greece, Sri Lanka, Spain, France, Ecuador, Poland, and the United Kingdom, primarily as mandated by its franchisors.

ONroute Policies and Due Diligence Processes

Supplier Code of Conduct

Since 2023, ONroute has maintained a Supplier Code of Conduct (“**Code**”), aimed at addressing the risk of human trafficking, forced and child labour in its supply chain, and to require minimum standards respecting human rights in general.

The Code includes requirements that Suppliers not use, support, engage in or require:

- Compelled, involuntary or forced labour;
- Labour to be performed by individuals under the age of 15 except as permitted in accordance with International Labour Organization Practices;
- Bonded labour;

- Indentured labour; or
- Prison labour.

The Code also mandates minimum requirements for freedom of movement; workers' rights to terminate their employment; compensation of workers; documentation; work hours; health and safety and compliance with applicable laws. Some of our suppliers have also implemented their own supply chain codes of conduct, which include anti-slavery and child labour policies relating to products we purchase.

ONroute is committed to continuous improvement to ensure the human rights of those who participate in our supply chain are protected. In this regard, ONroute is working on improvements to its vendor onboarding processes.

Internal Policies

ONroute's internal policies bolster our efforts to identify and eliminate modern slavery from our supply chains. They include:

- Code of Conduct for all ONroute employees - which articulates minimal expectations including compliance with all laws and regulations applicable to ONroute's business; honest business practices; and full cooperation with workplace investigations.
- Whistle Blower policy – which articulates ONroute's commitment to observe high standards of business and personal ethics in all its dealings, a responsibility that extends to all directors, officers and employees.
- Diversity Equity and Inclusion Policy, which requires that all ONroute employees comply with all relevant Human Rights and Employment Equity legislation. This includes all employees who source products and make our supply chain arrangements.

ONroute employees are required to confirm their understanding and compliance with ONroute's policies regularly. The Board of Directors are responsible for ensuring that financial and business affairs are conducted legally and ethically.

Potential Risks in ONROUTE's Activities and Supply Chain

ONroute procures a considerable proportion of goods and services from Suppliers who are either designated or approved by the franchisors of the brands that we operate. In 2024, those brands consisted of Tim Hortons, Starbucks, Burger King, New York Fries, Wendy's, Subway, A&W, Popeyes, Freshii and Booster Juice. As a franchisee, ONroute faces potential risk related to mandated/authorized providers chosen by and/or approved our franchisors - because ONroute is not in a position to choose or reject such suppliers. In this regard, ONroute must rely on the franchisors to take the appropriate steps to prevent and reduce the risks of forced labour and child labour in their supply chains.

ONroute has identified specific supply chain streams that may carry inherent risk of forced labour and child labour due to the sector and/or country of origin include food manufacturing, beverage and tobacco product manufacturing, apparel manufacturing, computer and electronic component manufacturing, other manufacturing (toys/plush merchandise), and food and beverage wholesalers.

To the extent that ONroute engages Suppliers directly, since 2023, ONroute has implemented processes with supply chain partners to address issues of forced labour and/or child labour, including the Supplier Code of Conduct and Whistle Blower policies, as noted above.

Training

In 2024, ONroute conducted a campaign to share information and create awareness of human trafficking, including digital displays within all our plazas with public service announcement videos, posters in our washrooms and a transport truck wrapped with information about how to spot human trafficking and take measures to end it. Information provided to our employees, guests and the general public by these methods included telephone numbers to report human trafficking anonymously, as well as the Canadian Human Trafficking Hotline. Our posters included URLs to obtain free survivor-led training on the crime of human trafficking.

Assessing Effectiveness and Remediation Measures

Complaints to our Whistle Blower line (and via other sources) are treated seriously and investigated. We did not receive any information or complaints in 2024 alleging forced labour or child labour in ONroute's supply chain. We are not currently aware of any evidence of modern slavery, including forced labour or child labour. Nor have we identified any loss of income to vulnerable families in 2024. Consequently, no remedial actions have been deemed necessary in this regard.

Conclusion

ONroute is steadfast in its dedication to preventing forced labour and child labour within our operations and across our supply chains. We will persist in regularly reviewing our policies, procedures, and practices to identify opportunities to strengthen our efforts.

Attestation

In accordance with the requirements of the Modern Slavery 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 the purposes of the Modern Slavery Act, for the 2024 reporting year.

Signed by: 
Signature: 8B316569EA4F4AB...

Date Signed: 5/14/2025

Full name: Adam Delaney
Title: Board Member

I have the authority to bind ONroute.

This Report was approved by the Board of Directors of ONroute on May 14, 2025