

# GATEKEEPER

## Canadian Modern Slavery Act Report

For the calendar year ending December 31, 2023

This Report is being prepared pursuant to the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (also known as the “**Modern Slavery Act**” or the “**Act**”), effective as of January 1, 2024.

This Report is being filed on behalf of Gatekeeper Systems Inc. (“**Gatekeeper**”, “**GSI**” or the “**Company**”), a British Columbia company, for itself and its wholly owned subsidiaries, Gatekeeper Systems USA Inc., a Delaware company (“**GSI USA**”), and Deep Development Corp., a British Columbia company (“**Deep**”). Gatekeeper, GSI USA and Deep are hereinafter collectively referred to as “**Gatekeeper**”, “**GSI**”, the “**Company**”, “**we**” or “**us**”.

We understand the importance of responsible global corporate citizenship, and we consider it critical to engage with all stakeholders and use good judgment, to make ethical choices with integrity. We are committed to ensuring that all forms of modern slavery, including forced child labor, compulsory labor and human trafficking, are excluded from our business and supply chain. Our business partners are expected to act in accordance with the highest standards of integrity and in compliance with all applicable laws and regulations.

We recognize that slavery and human trafficking can occur in many forms, including forced labor, forced child labor, domestic and indentured servitude, sex trafficking, bonded labor or debt bondage, and workplace abuse. Therefore, the terms “*slavery and human trafficking*” as used in this Report include these various forms of coerced labor.

### Structure, Activities and Supply Chain

#### **Structure**

Gatekeeper has offices at 301 – 31127 Wheel Avenue, Abbotsford, BC V2T 6H1, and GSI USA has offices at 200 Rittenhouse Circle, Suite 7E, Bristol, PA 19007. Deep has no current business activity. Gatekeeper’s common shares are listed for trading on the TSX Venture Exchange under the symbol “GSI”. The Company has approximately 61 employees in Canada and 43 employees in the United States.

#### **Activities**

Gatekeeper engineers, manufactures, and distributes industry leading high-definition mobile video and data solutions for a range of markets including school districts, public transit authorities, public safety and other municipal vehicle assets. Over the past several years, Gatekeeper has equipped school buses, transit buses and trains with over 100,000 video devices and approximately 50,000 intelligent Mobile Data Collectors (“**MDCs**”) which form the foundation of the Company’s Platform-as-a-Service (“**PaaS**”) business model. These intelligent MDCs collect vehicle data such as video, audio, GPS, time, door open/close, and serve as the “black box” to aid in transit accident investigations. The MDCs are Wi-Fi enabled, mobile connected, or mobile enabled, allowing public transport assets to become part of the intelligent transportation solution in a Smart City ecosystem.

Gatekeeper offers a suite of high-definition digital video devices that capture a comprehensive view of

activity both inside and outside school buses, transit buses and trains. Video evidence is recorded on a military-grade MDC located inside the vehicle. High-definition cameras operate in day or night conditions and collect detailed video evidence such as license plate details of vehicles illegally passing streetcars or school buses while passengers are loading or unloading. Gatekeeper MDCs allow real-time connectivity for video streaming, vehicle tracking, or driver training.

Gatekeeper also offers Artificial Intelligence (AI) solutions to support reliable video evidence collection and believes that AI is an important component within vehicle video safety and security. The Company's video management and video analytics software may be used in mobile or desktop applications for managing video evidence of incidents. Enterprise software configurations can be used to stream live video from any vehicle, anywhere, anytime.

### ***Supply Chain***

Gatekeeper's Canadian head office located in Abbotsford, British Columbia provides manufacturing assembly and testing for the company's Canadian markets. Product research and development, design, and engineering take place at the Abbotsford office. Products are sold to end-user customers through the Company's direct sales staff, as well as through a network of distributors and system integrators who have relationships with customers in multiple mobile markets. Gatekeeper is primarily focused on the North American market but has also pursued global distribution relationships outside of North America. Gatekeeper operates its US Subsidiary in Bristol, Pennsylvania which is its service center for major transit customer the Southeastern Pennsylvania Transportation Authority and school customer the School District of Philadelphia. The US Subsidiary employs a team of service technicians and operates a mobile fleet of service vehicles, to provide on-site installation, service and support. In addition, Gatekeeper products destined for US customers are assembled in Bristol, Pennsylvania to comply with "Buy America" requirements and mitigate the impacts of US trade tariffs.

The Company's main source countries for supply chain, whether its component level or full system OEM, includes Canada, USA, Taiwan, China, Hong Kong and exploring Vietnam. The Company's engineering team evaluates its suppliers' records and goals, including product hardware and software feature sets, product performance, product esthetics, software interface as well as hardware/software quality.

The Company's supply chain due diligence process includes site visits to the suppliers' facility to analyze and observe various areas such as working conditions, employee behaviour and overall quality assurance policies. The Company verifies its product supply chain through site evaluations, discussions, and verification methods, and requires its suppliers to agree and comply with design requirements and NDAA (National Defense Authorization Act) requirements, as a condition of a contract.

### **Policies and Due Diligence Processes**

#### ***Policies***

The Company's [Code of Business Conduct and Ethics](#) summarizes the legal, ethical and regulatory standards that Gatekeeper must follow and is a reminder to our directors, officers, employees, and consultants of the seriousness of that commitment. Amongst other things, it sets out our commitment to ethical and fair dealings with others and compliance with all laws and governmental regulations that are applicable to our activities.

The Company's [Whistleblower Policy](#) provides for a confidential and anonymous process exists whereby

the Company's directors, officers, and employees can raise questions or report concerns relating to known or suspected violations with respect to the Company's compliance with all applicable government laws, rules and regulations, corporate reporting and disclosure, accounting, internal accounting controls, or auditing matters. While the Whistleblower Policy is intended to be broad and comprehensive, examples of concerns include, among other things, any violation of the Company's Code of Business Conduct and Ethics.

We may terminate our relationship with any person or organization that does not comply with the above policies. Complete copies of our policies are available on our website at [www.gatekeeper-systems.com](http://www.gatekeeper-systems.com) under the "Investors – Team" page.

### ***Due Diligence Processes***

In order to prevent slavery and human trafficking in our business and supply chain we have implemented internal accountability standards and procedures.

Internal Leadership. Doug Fraser, VP Products and Programs, leads the development and implementation of the Company's efforts to promote responsible sourcing practices, which will include practices designed to prevent slavery and human trafficking. We also proactively communicate with external stakeholders and monitor trends and best practices in this area.

Risk Assessment. We intend to undertake a periodic risk assessment of our supply chain to better understand the potential risks related to slavery and human trafficking. These assessments will help us understand where human rights and labor issues may exist within our supply chain so that we can prioritize and focus our responsible sourcing efforts.

Employee Reporting. The Company maintains whistleblowing procedures and anti-retaliation policies in order to empower and encourage employees to raise any concerns regarding compliance with this Report, or any other concerns, without fear of retaliation. If the violation involves suppliers, appropriate action, up to and including termination of contracts will be undertaken.

### **Forced or Child Labor Risks in Our Business**

The Company has considered the ways in which our activities and supply chains could potentially cause, contribute to or be directly or indirectly linked to actual or potential slavery and human trafficking. The Company will use a risk-based approach to assess and manage the risk of slavery and human trafficking in our supply chain. This approach will help us prioritize our efforts and adjust our actions. Our methodology to identify risks in our supply chain through our due diligence process combines country risk indicators, supplier's category, and type of products or services offered by the supplier. The resulting risk score will determine the level of additional due diligence to be performed, including with respect to slavery and human trafficking and the extent of ongoing monitoring and frequency of review required.

### **Remediation Measures**

GSI has assessed our activities and supply chains and, as of the date of this Report, we believe that our activities and supply chain carry a low risk of risk of forced labor or child labor being used. If a situation of non-compliance is identified, the Company will work to develop and implement a corrective plan to improve and remedy the situation.

As of the date of this Report, the Company has not undertaken any measures to remediate the loss of income or specific activities for vulnerable families to remediate slavery and human trafficking in our supply chain.

### **Training Provided**

GSI has not yet developed training to ensure compliance with Company standards regarding this Report. We will continue to develop and implement policies and training that support our commitment to human rights, including the prohibition of slavery and human trafficking, adherence to labor laws, adherence to truthful and trustworthy practices when dealing with employees, proper disclosure of information, and supply chain diligence, management and verification processes.

### **Assessing Effectiveness**

The Company intends to periodically evaluate slavery and human trafficking risks as part of some of our audits conducted by our quality team. We intend to review, reassess, and further develop our anti-slavery and human trafficking plans, not only to ensure compliance with the law but also to ensure that we fulfil our core values as expressed in this Report.

Collectively, this Report, the policies, processes, and procedures described herein, are all designed to ensure that GSI and its suppliers at every level are committed to maintaining a workplace and supply chain free of slavery and human trafficking.

*[Approval and Attestation page follows]*

**Approval and 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 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 Act, for the reporting year listed above.

**Signature:** 

**Full Name:** Doug Dymant

**Title:** President, CEO, Executive Chairman and Director

**Date:** May 31, 2024

*I have the authority to bind Gatekeeper Systems Inc.*