



November 1, 2025

Artificial Intelligence Governance and Responsible Innovation Policy

Table of Contents

1.0 Our Commitment to Responsible Innovation.....	3
2.0 Why AI Governance Matters to Our Stakeholders	3
3.0 Guiding Principles for Responsible AI.....	3
4.0 Governance Structure and Accountability.....	5
5.0 Mergers & Acquisitions Integration.....	5
6.0 Responsible Data and Vendor Practices	6
7.0 Transparency and Reporting	6
8.0 Risk-Based Governance	6
9.0 Contact	7
10.0 Our Pledge	7
11.0 Approvals	7

1.0 Our Commitment to Responsible Innovation

At TFI International, we view Artificial Intelligence (AI) as a powerful enabler of transformation in the logistics and transportation industries. AI allows us to improve safety, efficiency, and sustainability while driving stronger business performance and shareholder value.

As a publicly traded holding company in Canada and the United States, we are committed to using AI responsibly, ensuring that all innovation is ethical, transparent, and compliant with Canadian and U.S. regulations. Our AI practices are guided by the same principles that underpin our governance, financial integrity, and ethical business practices.

Because we are active in mergers and acquisitions (M&A) across the trucking and logistics industry, this policy applies to all acquired companies and technologies. It ensures a consistent, responsible, and secure approach to AI throughout our enterprise.

2.0 Why AI Governance Matters to Our Stakeholders

Artificial Intelligence supports our mission to build a safer, smarter, and more sustainable logistics network. It enables us to:

- Improve fleet safety with predictive analytics and driver performance monitoring
- Increase efficiency through intelligent routing and real-time logistics optimization
- Advance sustainability by optimizing fuel use and reducing emissions
- Enhance customer experience through accurate and timely data insights

For investors, AI represents a meaningful opportunity and a governance responsibility. We manage AI with the same rigor applied to Sarbanes-Oxley (SOX) controls, NIST cybersecurity standards, and Canadian and U.S. privacy regulations, including PIPEDA, Law 25, the forthcoming CCPA, and U.S. acts such as the CCPA and CPA. This oversight extends to emerging AI governance and data protection legislation, including Canada's Bill C-27 – the Digital Charter Implementation Act (2022), which contains the Artificial Intelligence and Data Act (AIDA), as well as evolving international frameworks such as the EU AI Act.

This disciplined approach helps protect shareholder interests, ensure compliance, and strengthen long-term business resilience. Violations of Policies, Standards and/or Procedures

3.0 Guiding Principles for Responsible AI

Our approach to AI is guided by seven foundational principles:

1. Transparency and Explainability

We are transparent about how our AI systems operate, what data they use, and how decisions are made. When AI impacts individuals, such as drivers, employees, or customers, we explain how those decisions occur and provide access to human review as required by Québec's Law 25.

2. Accountability and Oversight

Every AI system has a designated business owner who is accountable for its operation, performance, and compliance. Responsibility for oversight flow through our AI Steering Committee, ensuring that decisions about AI use align with our corporate values and regulatory obligations.

3. Fairness and Inclusion

We test all AI systems for bias and discriminatory impacts before and after deployment. We believe equitable AI practices are essential to maintaining trust, protecting our workforce, and delivering fair outcomes to all stakeholders.

4. Privacy and Data Protection

We comply fully with privacy laws across all jurisdictions where we operate, including PIPEDA, Law 25, CCPA, and applicable U.S. state laws.

We minimize data collection, de-identify personal information where possible, and protect data through encryption and secure access controls. Under Law 25, individuals are informed when an automated decision affects them and may request a human review.

5. Security and Resilience

All AI systems are designed and maintained in accordance with the NIST AI Risk Management Framework (AI RMF 1.0) and NIST cybersecurity standards. The Vice President, IT Security ensures that AI assets undergo regular security assessments, resilience testing, and continuous monitoring to mitigate emerging threats.

6. Human Oversight and Ethical Use

We are committed to the ethical use of AI systems, ensuring that all applications uphold fairness, transparency, accountability, and respect for individual rights. AI augments, but never replaces, human judgment. Decisions affecting safety, employment, regulatory compliance, or financial reporting always include human review and validation. We expressly prohibit the use of AI for manipulative, exploitative, or discriminatory purposes, or in any manner that violates ethical or legal standards.

7. Auditability and Continuous Improvement

We maintain detailed documentation for all AI systems to support SOX internal control requirements and facilitate independent audits. Our AI Steering Committee conducts regular reviews to enhance accuracy, fairness, and compliance across all AI initiatives.

4.0 Governance Structure and Accountability

Our governance framework ensures that AI is developed and used responsibly, with clear accountability from the Board to business operations.

Role	Responsibility
Board of Directors	Provides oversight of AI ethics, compliance, and strategic risk as part of corporate governance.
AI Steering Committee	Oversees AI strategy, evaluates risk, and ensures consistent application of this policy across all subsidiaries.
Vice President, IT Security	Leads cybersecurity and risk management for all AI systems, ensuring alignment with NIST and privacy frameworks.
IT Leadership	Oversees the integration of AI technologies into enterprise architecture and operational systems.
Data Protection Officer (DPO)	Ensures adherence to privacy and data protection requirements, including Québec's Law 25.
Internal Audit	Reviews AI systems and controls for compliance with SOX and operational standards.
Business Unit Leaders	Maintain accountability for ethical and compliant AI use within their divisions.

5.0 Mergers & Acquisitions Integration

AI and data governance are key components of our M&A strategy in the trucking and logistics sectors.

- **Due Diligence:** Every acquisition undergoes a detailed review of AI systems, data management practices, and compliance posture.
- **Integration:** Newly acquired entities align with our AI Governance Policy and risk management framework as part of post-acquisition onboarding.
- **Remediation:** Legacy or non-compliant AI systems are upgraded, isolated, or decommissioned to ensure corporate alignment.

This disciplined approach protects our investors, employees, and customers while enabling scalable, responsible innovation across our portfolio.

6.0 Responsible Data and Vendor Practices

We treat data as both a business asset and a public trust. Our Corporate Data Governance Policy requires that all AI-related data be:

- Collected and processed lawfully and transparently
- Secured through encryption, access control, and retention management
- Subject to Privacy Impact Assessments (PIAs) for AI-related use cases
- Compliant with cross-border data transfer rules under PIPEDA and Law 25

All third-party AI vendors and partners must:

- Disclose data sources, model training methods, and potential limitations
- Comply with NIST, SOX, and privacy frameworks
- Undergo independent audits or certifications (e.g., SOC 2, ISO 42001)
- Promptly report any incidents or breaches involving AI or data

7.0 Transparency and Reporting

Transparency and accountability are essential to responsible AI use. The AI Steering Committee provides regular updates to executive leadership and the Board of Directors on AI-related risks, compliance status, system performance, incident response, and emerging regulatory requirements.

Where appropriate, and subject to legal and regulatory requirements, the company may communicate aspects of its AI governance practices to shareholders, customers, and partners through established corporate communication channels (e.g., annual reports, investor briefings, regulatory filings).

This approach ensures responsible oversight of AI without introducing unnecessary public reporting obligations.

8.0 Risk-Based Governance

We have adopted a risk-based approach to the development and deployment of AI systems. Each AI application is evaluated and managed according to its potential impact, complexity, and risk profile. This ensures that oversight, testing, and assurance activities are proportionate to the system's influence on people, operations, and compliance, in alignment with global standards such as the NIST AI Risk Management Framework and the emerging EU AI Act.

AI will continue to transform our industry and our operations. We are committed to developing and deploying AI in a manner that is:

- **Safe and Secure** — protecting our people and systems
- **Transparent and Fair** — ensuring trust and inclusion
- **Sustainable and Accountable** — aligning innovation with our corporate values and governance standards

We believe that strong AI governance not only safeguards compliance, but it also creates long-term value for shareholders and competitive advantage in our industry.

9.0 Contact

Questions or concerns about this policy or our AI governance practices may be directed to:

AI Steering Committee

Email: TFIAISteerCo@tfiintl.com

10.0 Our Pledge

We are building a future where innovation and integrity move together. Through strong governance, responsible leadership, and transparent reporting, we are ensuring that the power of AI advances our mission; delivering smarter logistics, safer roads, and lasting value for our customers, employees, and shareholders alike.

11.0 Approvals

Approved by the Corporate Governance & Nominating Committee and ratified by the Board of Directors

Approved on December 11, 2025

(signed) *Josiane M Langlois*

Corporate Secretary