# 2023 Forced & Child Labour Report



### 1. Introduction

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, (the "Act"), 2287462 Alberta Ltd. and each of its subsidiaries (collectively, "Go Auto", "we", "us", "our") are pleased to present our first Forced Labour and Child Labour Report ("Report") that states actions we have taken during the financial reporting period from January 1, 2023 to December 31, 2023 to identify and understand the risk of forced labour and child labour in our operations and supply chain.

Go Auto is committed to conducting business with honesty and integrity. Our aim is to strengthen our controls and to properly assess, prevent and reduce the risk that forced labour or child labour is used at any step in our operations and supply chain pursuant to section 11 of the Act. We recognize our responsibility to respect and protect human rights of all individuals who support and intersect with our business; as such, we expect our business partners and supplies to uphold these same principles and adhere to applicable human rights and employment standard laws.

### 2. Company Overview & Structure

Go Auto is one of Canada's largest and most successful privately owned automotive retail groups. Operating since 1996, Go Auto has grown a wide network of dealership and recreational vehicle locations spanning across Canada, and more recently, into the United States. Headquartered in Edmonton, Alberta, Canada, Go Auto currently employs approximately 3,500 full-time employees across Canada and the United States, and is comprised of 28 brands spanning 5 provinces and 1 territory, and Washington, USA. Our brands include Audi, BMW, Chrysler, Jeep, Dodge, Ford, Hyundai, Genesis, Buick, Fiat, Infiniti, Volkswagen, Mazda, Porsche, Jaguar, Land Rover, Lincoln, Kia, Honda, Nissan, Chevrolet, Ram, GMC, Toyota, Mercedes, Sprinter, Mitsubishi, Subaru, Thor, and Forest River.

### 3. Activities & Supply Chains

Go Auto's operations include new and used vehicle sales, the sale of vehicle accessories, parts, care products, vehicle repair and servicing, and the provision and facilitation of financing, insurance, and warranty products associated with the sales, purchase, or lease of vehicles.

Go Auto's supply chain is primarily based on the supply chain of Original Equipment Manufacturers ("OEMs"). We also purchase goods and services from other third-party suppliers, and these suppliers are based within Canada and the United States. A detailed breakdown of our suppliers' products and services include:

- Motor vehicles, parts, and accessories.
- Equipment and consumables, such as those relevant to our servicing businesses.
- Logistics and transport services.
- Finance and insurance products.
- Professional services, including legal and tax advice.
- Car washing and detailing services.

- Property, cleaning, storage, and waste disposal services.
- Information technology and telecommunication equipment and services.
- Office services and supplies.
- Food and beverage services.
- Personnel and recruitment services.



### 4. Steps Taken to Prevent & Reduce the Risks of Forced & Child Labour

In our financial year ending December 31, 2023, our approach to preventing and reducing the risks of forced labour or child labour in our operations focused on applying our formal policies, codes of conduct for our employees, and complying with laws protecting our customers, colleagues, and employees. In our supply chains, we conducted a high-level assessment of the risks of forced labour or child labour in our supply chains and reviewed the available information about our OEMs and suppliers' practices relating to modern slavery risks.

#### 5. Policies & Due Diligence Processes

Go Auto is committed to protecting human rights, founded on a strong belief in doing what is right and creating a safe and inclusive experience for all colleagues and workers across our value chain and for the many customers who choose our products and services. Through formal policies, codes of conduct for our employees, and adherence with provincial, state, and federal compliance standards, we strive to uphold the rights of customers, colleagues, and employees, as well as the many workers, including migrant and temporary labourers, across our companies.

Our due diligence with respect to our supply chain consists of complying with the conditions of our agreements with the OEMs and purchasing products and services from known, reputable suppliers and service providers in Canada and the United States.

Furthermore, our Employee Code of Conduct notes that it "applies to all employees...across all jurisdictions" and encompasses "independent contractors, consultants, agents, and other representatives". Specifically, it states that all individuals "must always follow applicable jurisdictional laws, rules, and regulations". Our onboarding process for all new staff ensures that our Code of Conduct is communicated properly and clearly to all employees who join our organization. By adhering to company policies and procedures that comply with legal and regulatory requirements, we are confident that we have mitigated the risk of forced labour or child labour within our workforce.

Moving forward, we will be updating our codes of conduct to directly incorporate language that outlines our principles of respect and accountability for human rights, as described in this Report.

### 6. Assessment of Forced & Child Labour Risks

Go Auto has conducted a high-level assessment of the risks of forced labour or child labour within our operations and supply chains. We have reviewed various OEM's Supply Chains Act Reports to gain an understanding of the OEM's practices in place to mitigate forced labour and child labour risks, and we have consulted with other key suppliers to discuss the issue of modern slavery risks within the supply chain network.

The supply chains in the automotive industry are complex. There are numerous levels of suppliers between Go Auto and the source of raw materials that form the basis of our business' supply chains. Despite this, we are confident that Go Auto operates in a relatively low-risk business sector. This is because our principal suppliers of goods are OEMs, which have robust governance, business practices and sophisticated anti-slavery policies and procedures in place.

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Despite the safeguards put in place by the OEMs, we are keenly aware of the potential for Go Auto to cause or contribute, directly or indirectly, to modern slavery through our operations and supply chain where aspects of manufacturing are outsourced to geographical locations with higher instances of modern slavery practices. We are working to better understand the supply chains of all key partners and their corresponding modern slavery policies and practices to mitigate forced labour and child labour risks going forward.

### 7. Remediation Measures

Our Report recognizes that there is no "one size fits all" approach to remediation, and our response to any such matters would be formulated considering the prevailing facts and circumstances. In all cases, however, we will respond in a manner that is appropriate and ensures that the victim's wellbeing is prioritized. We encourage our employees to report conduct that is contrary to our policies and codes of conduct, through confidential internal reporting mechanisms.

To date, Go Auto has not identified any specific instances of forced labour or child labour in its supply chain, and therefore, no remediation measures have been taken.

### 8. Remediation of Loss of Income

To date, Go Auto has not identified any instances where the measures we have implemented to eliminate forced labour or child labour from our supply chain has led to the loss of income, and as such no remediation measures have been taken to address this issue.

#### 9. Training

Go Auto is continuing our endeavors to ensure that our organization and people are mitigating any risk of forced labour or child labour in our supply chain and in our operations. In accordance with our established workplace policies and codes of conduct, we train employees to comply with legal and regulatory requirements relating to safety and human rights at the workplace.

As part of our commitment to strengthen our controls in accordance with the Act, we are exploring additional training programs and materials offered through third party specialists and supplier partners to increase our knowledge and awareness of the indicators, risks, and due diligence requirements relating to the risks of forced labour and child labour.

#### 10. Assessing Effectiveness

Go Auto is committed to continuously improving our awareness surrounding modern slavery policies and risks. We will be taking action to assess our effectiveness in preventing and reducing the risks of modern slavery by collaborating with our suppliers to improve our understanding of the supply chain and modern slavery policies and practices in our extended supply chain.

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### 11. Approval & Attestation

This Report has been approved by the Directors of each of the reporting entities covered by this statement, being 2287462 Alberta Ltd. and each of its controlled entities in accordance with section 11(4)(b)(ii) of the Act.

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 and each of its controlled entities. 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.

Full name: Christopher Burrows

Title: Director

Date: May 30, 2024

Signature:

I have the authority to bind 2287462 Alberta Ltd and its subsidiaries.