

51633 Newfoundland and Labrador Inc. o/a Hickman Automotive Group Modern Slavery Report

January 1, 2023 to December 31, 2023

1.0 Introduction

This report is prepared by 51633 Newfoundland and Labrador Inc. (“51633” or “we” or “us”) for the fiscal year ended December 31, 2023 (Fiscal 2023) as required by the Fighting Against Forced Child Labour in Supply Chains Act (the “Act”). The report covers the operations of these subsidiary companies as outlined in the Structure section below.

This report summarizes the steps taken to prevent and reduce the risk that modern slavery is used at any step of the production of goods that are produced, sold, or distributed by us. This report constitutes the first report made by us under this Act.

In this report, we use the term “modern slavery” to refer to forced labour and child labour.

2.0 Structure, Activities and Supply Chains

51633 is a corporation incorporated under the Corporations Act of Newfoundland and Labrador as are the following subsidiary companies:

Hickman Motors Limited, Hickman Leasing Limited, 61050 Newfoundland & Labrador Inc., 63907 Newfoundland & Labrador Inc., 66111 Newfoundland & Labrador Limited, 67955 Newfoundland & Labrador Corp and 74250 Newfoundland & Labrador Inc.

Through these subsidiaries, 51633 specializes in the retail sale of motor vehicles and parts as well as comprehensive vehicle servicing and repairs throughout its network of dealerships located in St. John’s, Clarenville, Gander, Grand Falls-Windsor, Burin and Carbonear all within the province of Newfoundland & Labrador.

51633 is not the importer of any goods for the purposes of the Customs Act. Our supply chain consists of suppliers of finished goods based either in Canada or the United States.

As a dealer of new and used vehicles and their parts, our supply chain is primarily based on the supply chain of automotive manufacturers. Specifically, as General Motors of Canada Limited (GM) and Fiat Chrysler Automobile Canada (FCA) authorized dealers dealer, the majority of the Company’s procurement spend is with GM and FCA and we rely on their supply chain processes.

Relevant links to latest available information from both are included here:

[General Motors Company Anti-Slavery and Human Trafficking Statement \(gm.com\)](#)

3.0 Policies and Due Diligence Processes

We have an internal Code of Conduct that has been adopted as the minimum standard of ethics for all employees of 51633. Complying with the Code is part of terms and conditions of employment with 51633. It is intended to help guide all employees to effectively recognize and address ethical issues, and help to foster and sustain a culture of honesty and accountability.

4.0 Assessment of Forced Labour and Child Labour Risks

Our operations are contained entirely within Canada and our supply chain is dominated by large manufacturers in the automotive industry.

The Company has not independently engaged in its own risk assessment with regards to forced labour or child labour in its supply chain. As the majority of the Company's supply chain is based on the supply chain of GM and FCA, it relies on the assessment undertaken by those entities as demonstrated through the links included in Section 2.0 above.

5.0 Remediation Measures

The Company has not identified any instances of forced labour or child labour in its supply chain, and so no remediation measures have been taken.

6.0 Remedial Measures

The Company has not identified any instances where the measures it has implemented to eliminate forced labour or child labour from its supply chain has led to the loss of income, and so no remediation measures have been taken to address this issue.

7.0 Training

In 2024, we have enrolled our Executive team as well as store managers for each location in a training course offered by the Canadian Association of Automobile Dealers. We expect to expand this training further once the first cohort has completed and evaluated its usefulness.

8.0 Assessing Effectiveness

As of this date, the company has not taken any action to assess its effectiveness in addressing risks of forced labour and child labour in its activities and supply chains.

9.0 Approval and Attestation

This report has been approved by the Board of Directors of 51633 Newfoundland & Labrador Inc. 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 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.

Full name: Gary C Bishop

Title: VP and CFO, Director

Date: May 30, 2024

Signature:



I have the authority to bind 51633 Newfoundland & Labrador Inc.