

May 31, 2024

A.J. Toner Limited and Township Chevrolet Buick GMC Ltd. Fiscal Year 2023 Modern Slavery Report

January 1, 2023 – December 31, 2023

1. Introduction

This report is made on behalf of A.J. Toner Limited and Township Chevrolet Buick GMC Ltd. (“Township”) (jointly referred to herein as the “Company”, “we” or “our”) and describes the actions taken by the Company during the financial year ending December 31, 2023 to assess, prevent and reduce the risk that forced labour or child labour is used at any step in its operations and supply chains pursuant to the requirements of section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“Act”). This Report constitutes the first report prepared by the Company under the Act.

2. Steps to Prevent and Reduce the Risk of Forced Labour and Child Labour

The Company did not take any steps during Fiscal 2023 to prevent and reduce the risk of forced labour or child labour in our operations or supply chains. Subsequent to Fiscal 2023 the Company has:

- Contacted suppliers of automotive parts to ascertain the risk of forced labour and child labour in their supply chain.
- Implemented training materials for employees to enhance their awareness and understanding.

3. Structure, Activities and Supply Chains

Township is a corporation owned solely by A.J. Toner Limited, operating as an automotive retailer of General Motors of Canada Company (“GM Canada”) based in Summerside, Prince Edward Island. Township specializes in the retail sale of motor vehicles and parts as well as comprehensive vehicle servicing, repairs and detailing.

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 an authorized General Motors Company (“GM”) dealer, the majority of Township’s procurement spend is with GM Canada. GM Canada sources parts directly from global suppliers via GM’s centralized supply chain function. Global suppliers provide parts, tires, raw materials and other goods and services which are used in the manufacturing of GM vehicles in multiple locations globally. GM Canada also source from local supply chains for goods and services such as, but not limited to, advertising, healthcare, office supplies and information technology.

In addition to those parts supplied through GM Canada, Township purchases parts directly from local suppliers for which raw materials and goods may originate from other jurisdictions; CarQuest Canada Ltd (Advanced Auto Parts Inc.), Les pieces d’autos Transbec Inc. and Provincial Auto Parts Limited (NAPA Auto Parts).

4. Policies and Due Diligence Processes

As a local dealer of GM Canada, Township relies on the policies and due diligence processes of GM to identify and mitigate the risk of forced labour and child labour in the supply chains. All GM suppliers are expected to adhere to the [Supplier Code of Conduct](#) which prohibits the use of modern slavery in the form of forced labour or child labour. GM also participates in the following initiatives to mitigate the risk of modern slavery:

- Surveying tier 1 suppliers of conflict minerals, such as tin, tungsten, tantalum and gold to gain visibility into the supply chain.
- Participation in the Responsible Mineral Initiative, confirming that smelters or refiners pass the Responsible Minerals Assurance Process.
- Joining the Initiative for Responsible Mining Assurance, which provides third party certification of mine sites.
- Founding Member of the Global Platform for Sustainable Natural Rubber.

5. Assessment of Forced Labour and Child Labour Risks

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 Township's supply chain is based on the supply chain of GM Canada, it relies on the assessment undertaken by GM Canada with regards to the extent of this risk, as outlined in GM's [Modern Slavery Report](#).

6. 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.

7. Remediation of Loss of Income

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.

8. Training

As part of the onboarding process, Township requires all new employees to review and sign off on the Company Handbook which details our Code of Conduct and policies, as well as complete training in areas such as Human Rights and workplace ethics.

As of May 2024, Township has included a course on "Forced Labour and Child Labour in the Supply Chains" which is mandatory for all employees to complete and sign off on their understanding and acknowledgement.

9. Assessing Effectiveness

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.

10. Approval and Attestation

This report has been approved by Adam Toner of A.J. Toner Limited, in accordance with section 11(4)(b)(ii) 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: Adam Toner

Title: President

Date: May 31, 2024

Signature: Adam Toner

I have the authority to bind A.J. Toner Limited