

Annual Report

Canadian Bill S-211

Reporting for entities

1. *What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Required)

- Mapping activities
- **Mapping supply chains**
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Developing and implementing an action plan for addressing forced labour and/or child labour
- **Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily**
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- Developing and implementing child protection policies and processes
- **Developing and implementing anti-forced labour and/or -child labour contractual clauses**
- **Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists**
- Auditing suppliers
- Monitoring suppliers
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
- **Developing and implementing grievance mechanisms**
- **Developing and implementing training and awareness materials on forced labour and/or child labour**
- Developing and implementing procedures to track performance in addressing forced labour and/or child labour

- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour
- Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks
- Information not available for this reporting period
- Other, please specify:

2. Please provide additional information describing the steps taken (if applicable) (1,500 character limit).

Mapping Supply chains:

- 1) AM General incorporates into our Supplier Purchase Orders (POs), AM General's Standard Terms and Conditions of Purchase which addresses forced/child labor restrictions in accordance with USA's Fair Labor Standards Act of 1949.
- 2) Applicable Prime Contract Flow-downs, such as Federal Acquisition Regulation (FAR) 52.222-19 Child Labor—Cooperation with Authorities and Remedies, is also incorporated into Supplier POs when applicable.
- 3) In order to have visibility into sub-tier supply chain, AM General collects "Country of Origin" data that help us assess any potential risks, based on the country from which raw material or material within manufactured parts are sourced and/or manufactured.

Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily:

- 1) AM General is in strict compliance with USA's Fair Labor Standards Act of 1949 and Michigan and Indiana State Laws, which prohibit child labor and forced labor.
- 2) AM General pays fair and equitable employee salaries based on education, experience, and market trends, where written voluntary employment contracts are executed by both AM General and individual employees. Employee age, identification, and citizenship status is verified via background screening. AM General does not hire employees below the State employment legal age.
- 3) AM General ensures compliance with US Equal Employment Opportunity Federal Laws.

Implementing anti-forced labour and/or -child labour contractual requirements:

- 1) AM General is in strict compliance with USA's Fair Labor Standards Act of 1949 and Michigan and Indiana State Laws, which prohibit child labor and forced labor.
- 2) AM General pays fair and equitable employee salaries based on education, experience, and market trends, where written voluntary employment contracts are executed by both AM General and individual employees. Employee age, identification, and citizenship

status is verified via background screening. AM General does not hire employees below the State employment legal age.

- 3) AM General incorporates into our Supplier Purchase Orders (POs), AM General’s Standard Terms and Conditions of Purchase which addresses forced/child labor restrictions in accordance with USA’s Fair Labor Standards Act of 1949.
- 4) Applicable Prime Contract Flow-downs, such as Federal Acquisition Regulation (FAR) 52.222-19 Child Labor—Cooperation with Authorities and Remedies, is also incorporated into Supplier POs when applicable.

Implementing anti-forced labour and/or -child labour standards and Codes of Conduct:

AM General Code of Conduct is accessible via both our Intranet and Extranet. The AM General Code of Conduct applies to all individuals associated with AM General, including its employees, subsidiaries, agents, contracted labor, joint venture partners, contractors, and suppliers. It outlines the fundamental principles that guide our conduct at AM General, as depicted below:

Human Rights

Our products impact people around the world – from those who use them to those who help build them. We’re determined to protect them all with quality products and a commitment to preserving human rights.

The Way We Work

Nearly every aspect of our business can impact human rights. The way we source materials, manufacture our products, and sell and distribute them – they all affect people and communities, and it’s up to each of us to play a positive and protective role.

AM General expects you, no matter what job you hold, to work ethically and help ensure that everyone who contributes to our products has the right to live and work freely and with dignity. Remember, we prohibit human rights violations such as:

- Child labor
- Forced or compulsory labor
- Human trafficking
- Physical punishment
- Violence and human rights violations in connection with the mining of conflict minerals

How can I prevent human rights abuses?

Follow all human rights laws that apply to us. Remember, different laws may apply in different countries, so ask the **Legal Department** if you’re unsure how a law applies.

Also ensure that our business partners share our commitment by providing high-quality, responsibly sourced products and safe and fair work environments and following applicable laws, including those aimed at providing conflict-free minerals.

Speak up if you become aware of a possible human rights violation.

WHAT MAKES A SAFE AND FAIR WORKPLACE?

When it gives employees:

SAFE WORK CONDITIONS

FAIR PAY

REASONABLE AND LEGAL WORK HOURS

POLICY TOOLBOX
Human Rights Policy
[Supplier Website](#)

Implemented grievance mechanisms:

AM General employees are encouraged to consult with the Company's Human Resources Department and/or Law Department if they are uncertain whether a specific action would be in violation of the Company Code of Conduct, Ethics, and Human Rights Policies.

All Employees are obligated to speak up if they are aware or become aware of an issue or concern with this Policy or with respect to human dignity and rights within the Company. Any issue or concern can confidentially and anonymously be reported to the Ethics Hotline.

Ethics Hotline: 1-800-344-6593

Global Human Trafficking Hotline: 1-888-373-7888)

AM General will investigate and appropriately address all reported concerns. There is no tolerance for any form of retaliation for reporting in good faith.

Implementing training and awareness forced labour and/or child labour:

All AM General employees are required to complete annual mandatory 'Code of Ethics/Conduct' training, which addresses the topic of child labor and/or forced labor.

3. *Which of the following accurately describes the entity's structure? (Required)

- **Corporation**
- Trust
- Partnership
- Other unincorporated organization

4. *Which of the following accurately describes the entity's activities? Select all that apply. (Required)

- Producing goods (including manufacturing, extracting, growing and processing)
 - in Canada
 - outside Canada
- Selling goods
 - in Canada
 - outside Canada
- Distributing goods
 - in Canada
 - outside Canada
- **Importing into Canada goods produced outside Canada**
- Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

5. Please provide additional information on the entity's structure, activities and supply chains (1,500 character limit).

At AM General, we are proud to engineer, manufacture, and support specialized vehicles for military and commercial customers. Delivering quality products to those who serve and ensuring that they are prepared to succeed in their mission is our purpose.

We are the leading manufacturer of light tactical platforms that include the iconic HUMVEE vehicles, the next generation of the Joint Light Tactical Vehicle (JLTV A2), the highly protected and ultra-nimble HUMVEE Saber light tactical truck, and the revolutionary HUMVEE 2-CT Hawkeye with soft recoil technology for mobile platforms.

Our global presence of diverse products in over 70 countries uniquely positions us to enhance interoperability across Allies and build upon our long-standing defense industry and automotive partnerships. Our innovative spirit delivers advanced, rugged, resilient, and dependable mobility solutions that will move you.

We offer continuous improvement that is *Mission Ready, Future Driven*. Our extensive experience meets the changing needs of the defense and automotive industries, supported by employees at major facilities in Indiana, Michigan, and Ohio, and a strong supplier base that consists mainly of domestic American suppliers across 43 states across the USA, in alignment with federal "Buy American Initiatives."

6. *Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)

- Yes
- No

6.1 *If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)

- **Embedding responsible business conduct into policies and management systems**
- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate

7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500 character limit).

AM General's Human Rights Corporate Policy defines our commitment to uphold human rights in the workplace and to adopt a respectful approach to all persons right to dignity, equality, fairness, autonomy, and respect. This Policy upholds the rights of all individuals as being free and equal, regardless of such factors as nationality, gender, race, religion, disability, or economic status and affirms our commitment to our employees and sets the standards for treatment.

We adhere to applicable employment laws in the jurisdictions where we operate, and in many cases exceed minimum standards. These include maximum hours of daily labor, rates of pay, minimum age, privacy, freedom from discrimination, and other fair working conditions. We do not employ, nor do we support the use of, child labor and prohibit the use of chattel slaves, forced labor, bonded laborers, or coerced prison labor.

All Employees are obligated to speak up if they are aware or become aware of an issue or concern with this Policy or with respect to human dignity and rights within the Company. Any issue or concern can confidentially and anonymously be reported to the Ethics Hotline. AM General will investigate and appropriately address all reported concerns. There is no tolerance for any form of retaliation for reporting in good faith. (Ethics Hotline: 1-800-344-6593 and Global Human Trafficking Hotline: 1-888-373-7888)

Purchase Orders issued to our supply base incorporate, 1) AM General Terms of Purchase which address forced/child labor restrictions in accordance with USA's Fair Labor Standards Act of 1949, and when applicable, and 2) flow-down applicable prime contract clauses such as, Federal Acquisition Regulation (FAR) 52.222-19 Child Labor—Cooperation with Authorities and Remedies.

8. *Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)

- Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.
- **Yes, we have started the process of identifying risks, but there are still gaps in our assessments.**
- No, we have not started the process of identifying risks.

8.1 *If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Required)

- The sector or industry it operates in
- The types of products it produces, purchases or distributes
- The locations of its activities, operations or factories
- The types of products it sources
- The raw materials or commodities used in its supply chains
- Tier one (direct) suppliers

- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour
- The use of forced labour
- The use of child labour
- None of the above
- **Other, please specify.**

While monitoring risk is an ongoing activity, to date AM General has not identified any risks in our supply chains pertaining to forced labor or child labor.

9. *Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Required)

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- **None of the above**
- Other, please specify

10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit).

Not applicable.

11. *Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)

- Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.
- **Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.**

11.1 *If yes, which remediation measures has the entity taken? Select all that apply. (Required)

- Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support
- Compensation for victims of forced labour or child labour and/or their families
- Actions to prevent forced labour or child labour and associated harms from reoccurring
- Grievance mechanisms
- Formal apologies
- **Other, please specify.** Not applicable.

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).

Not applicable.

13. *Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Required)

- Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.
- **Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.**

14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable) (1,500 character limit).

Not applicable.

15. *Does the entity currently provide training to employees on forced labour and/or child labour? (Required)

- Yes
- No

15.1 *If yes, is the training mandatory? (Required)

- **Yes, the training is mandatory for all employees.**
- Yes, the training is mandatory for employees making contracting or purchasing decisions.
- Yes, the training is mandatory for some employees.
- No, the training is voluntary.

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit).

AM General mandates annual code of 'Conduct of Conduct' training which covers ethics and compliance training that teaches employees how to behave in accordance with the values and standards of our organization. It covers topics such as avoiding conflicts of interest, protecting confidential information, preventing discrimination and harassment, preventing forced or child labor, and responding to unethical or illegal situations.

The training specifically covers 'Human Rights' both within AM General and as it applies to our supply chain and supply base. Our products impact people around the world – from those who use them to those who help build the. As such, AM General is steadfast in our ongoing efforts to protect them all with our quality products and commitment to preserving human rights.

The AM General annual mandatory training highlights how nearly every aspect of the AM General business can impact human rights. The way we source material, manufacture our products, and sell and distribute them affect people and communities and how it is up to every person and entity throughout our supply chain to play a positive and protective role.

The training also provides reminders regarding prohibition of human rights violations such as:

- Child Labor
- Forced or compulsory labor
- Human trafficking
- Physical punishment
- Human rights violations pertaining to mining of conflict minerals

The training encourages employees to speak up and report any human rights violations they may experience of witness.

17. *Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Required)

- Yes
- No

17.1 *If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Required)

- Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour
- Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
- Partnering with an external organization to conduct an independent review or audit of the organization's actions
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators
- **Other, please specify.**

AM General continuously monitor our Ethics Hotline and Human Trafficking Hotline for any reports pertaining to violation of any form of human rights. While we have not experienced any reports of human rights violations within the company and our supply base, we are equipped to take immediate ethical and legal steps to safeguard human rights in alignment with our company code of conduct, Policies, and US Federal and State Regulations.

18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).

AM General continuously monitors our Ethics Hotline and Human Trafficking Hotline for any reports pertaining to violation of any form of human rights. While we have not experienced any reports of human rights violations within the company and our supply base, we are prepared to



take immediate ethical and legal steps to safeguard all human rights in alignment with our company code of conduct, Policies, and US Federal and State Regulations.

This report is made pursuant to Canadian Bill S-211, an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending December 31st, 2023. It has been issued on behalf of AM General LLC and approved by the undersigned.

Name: Tricia A. Sherick

Company: AM General LLC

Title: Executive Vice President & General Counsel

Signature: *Tricia A. Sherick*