

Canada's Modern Slavery Act

Introduction

This statement sets out The Bennett Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no forced or child labour in its own business and supply chains. This statement covers Motivity Investments Ltd., Bennett Automotive Group Inc., 493665 Ontario Limited, Provincial Chrysler Ltd., and Oxford Dodge Chrysler (1992) Ltd. and relates to actions and activities during the financial year Jan 1st – Dec 31st, 2023.

As part of the automotive industry, the group recognises that it has a responsibility to take a robust approach to forced and child labour. The Bennett Group is committed to preventing forced and child labour in its corporate activities, and to ensure to the best of our knowledge that its supply chains are free from forced and child labour.

Group structure, activities and supply chains

Motivity Investments Ltd. is the parent corporation of the group. Bennett Automotive Group Inc. and 493665 Ontario Limited are holding corporations. Provincial Chrysler Ltd. and Oxford Dodge Chrysler (1992) Ltd., both corporations, are franchised Chrysler, Dodge, Jeep, Fiat & Alfa Romeo dealerships, principally engaged in the sales and service of new and used motor vehicles. In addition, the group operates vehicle leasing and rental business centres. The Bennett Group operates in southwestern Ontario, Canada.

Our supply chain includes sourcing vehicles, parts and other materials required to sell and service new and used vehicles. Majority of our supply chain is within the operating region but does stretch outside of Canada. New vehicles are purchased from Fiat Chrysler Automobiles who have manufacturing facilities in Italy, Mexico & across North America. Fiat Chrysler Automobiles is subject to compliance with the act and based on previous reporting, for the Modern Slavery Act 2015 in the Netherlands, they haven't identified any issues. Here is a link to Fiat Chrysler Automobile's report - https://www.stellantis.com/content/dam/stellantis-corporate/archives/fca/corporate-regulations/Modern_Slavery_Act.pdf

Policies and due diligence processes in relation to forced labour and child labour

No specific policies and due diligence processes related to forced or child labour were in place in the reporting period. The group has now put in place the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent forced and child labour in its operations:

- Whistleblowing policy - the group encourages all its employees, customers, and other business partners to report any concerns related to the direct activities, or the supply chains, of the group. This includes any circumstances that may give rise to an enhanced risk of forced or child labour. Customers are sent and encouraged to complete a survey to give anonymous feedback. Employees who have concerns are expected as indicated in the employee handbook to report those to the general manager.
- Employee code of conduct - the group's code makes clear to employees the actions and behaviour expected of them when representing the company. The group strives to maintain the highest standards of employee conduct and ethical behaviour when representing the company and managing its supply chain.

The following due diligence processes have now been put in place for considering taking on new suppliers, and regularly reviewing existing suppliers:

- Understanding the supply chain broadly to assess particular product or geographical risks of forced or child labour;
- reviewing on a regular basis all aspects of the supply chain;
- build strong, long-term relationships with suppliers to ensure their business ethics align with ours;
- creates a risk profile for every potential new supplier;

The parts of the business and supply chains that carry a risk of forced labour or child labour, and the steps taken to assess and manage that risk

Although we did not have a process in place during the reporting period to assess risks of forced or child labour, we are developing a process that would consider factors such as the following to determine whether or not particular activities or countries are high risk in relation to forced or child labour:

- the geographical region the product or service is coming from
- the quality of the supplier selling the product or service
- the dollar value of the product or service compared to market value
- the nature of the transaction

High-risk activities

As we did not have a risk assessment process in place for the year ended December 31, 2023, we have not yet identified any high-risk areas for forced or child labour within the group or its supply chains.

Steps taken to manage risk

As noted in the policies and due diligence section above, although we did not implement risk management processes specifically related to forced or child labour in 2023, we are in the process of implementing risk management processes in 2024.

Any measures taken to remediate any forced labour or child labour

During the year ended December 31, 2023, the organization did not identify any instances of forced or child labour within the organization or its supply chains.

Any measures taken to remediate 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

During the year ended December 31, 2023, the organization did not identify any instances of forced or child labour within the organization or its supply chains.

Training provided to employees on forced labour and child labour:

No specific training related to forced or child labour was provided to employees in the reporting period. However, the group has now mandated all employees to complete the training, "Forced Labour and Child Labour in the Supply Chains", before December 31, 2024, as part of the annual training requirements. The group's modern slavery training includes how to identify the signs of slavery and human trafficking, what initial steps should be taken if slavery or human trafficking is suspected and how to escalate potential slavery or human trafficking issues to the relevant parties within the group. Managers are required to complete additional training on what steps should be taken if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the group's supply chains.

Approval

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 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: James Bennet

Title: President

Date: May 31, 2024

Signature

"I have the authority to bind "The Bennett Group""

