

2023 Forced Labour and Child Labour Report

- BarMax Auto Ltd o/a East Coast Kia

Introduction

In accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act, (the "Act"), East Coast Kia is pleased to present its first forced labour and child labour report (the "Report"), covering the financial reporting period of January 1, 2023 to December 31, 2023.

This Report outlines the efforts and actions East Coast Kia has taken over the reporting period in its approach to identify and understand the risk of forced labour and child labour in its operations and supply chain and to strengthen its controls to reduce and mitigate these risks.

East Coast Kia is committed to doing business ethically and seeks to minimize and eliminate the risk of modern slavery in our supply chain and in our organization.

Structure, Activities and Supply Chains

Structure

East Coast Kia is a Kia Canada franchised automotive dealership located in St. John's, NL Canada.

As of December 31, 2023, East Coast Kia has approximately 50 full-time employees located exclusively in Canada.

Activities

East Coast Kia's core activity is the operation of an automotive dealership.

These activities include the following:

- selling new and used vehicles.
- selling and distributing parts, and accessories.
- providing vehicle repair and servicing services.
- provision of, or facilitation of, vehicle finance, insurance and warranty products related to the sale, purchase, or lease of vehicles.

Supply Chains

East Coast Kia's supply chain is heavily reliant on Kia Canada and includes:

- manufacture and assembly of vehicles and parts.
- importation of vehicles and parts.
- local transportation of vehicles and parts to dealerships.

During the reporting period, the largest categories of supply chain expenditures were:

- vehicles (new and used)
- vehicle parts
- consumables (vehicle related – fuel, oil, and lubricants)

Policies and Due Diligence processes in relation to forced labour and child labour

Modern Slavery in Operations Risks

In seeking to prevent and reduce the risk that forced labour or child labour was used in our operations and supply chains, East Coast Kia has:

- Subsequent to the reporting period of December 31, 2023, conducted a high-level internal assessment of the risks of forced labour or child labour in our activities and supply chain.
- 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.
 - As a result, no measures were needed to remediate loss of income to the most vulnerable families that results from forced labour or child labour in activities and supply chains.

East Coast Kia's business operations are based within Canada and abides by the minimum age of work as defined by governing legislation, therefore at low risk from engaging in forced or child labor.

East Coast Kia's supply arrangements relate to the purchase of new vehicles and parts from our original equipment manufacturer Kia Canada. East Coast Kia is committed to ensuring there is no slavery, forced or compulsory human labour or any other form of exploitation in any part of our business or supply chain.

Policies and Practices

East Coast Kia's corporate governance framework is supported by policies, documents, and practices which will affirm our stance on modern slavery.

Code of Business Conduct

East Coast Kia's Code of Business Conduct requires employees to adhere to the highest ethical standards and to comply with all applicable laws.

The Code of Business Conduct further provides that "Full compliance with this Policy is expected of all employees. If you become aware of, or suspect, a contravention of the Code of Business Conduct, you must report the facts promptly."

Code of Conduct Policy

East Coast Kia believes that it is a shared responsibility of all employees to work towards the constant improvement of our workplace. To help the organization maintain an exemplary work environment, we require that all employees conduct themselves ethically and professionally at all times, in accordance with the guidelines detailed in the Code of Conduct Policy.

Although no specific training related to forced or child labour was delivered during the 2023 reporting period, our organization is developing a training program to specifically address modern slavery and human trafficking.

Our organization will require all staff/staff working in supply chain procurement to complete the designated training once it is developed.

Reviewing our Suppliers' Practices

Although reviewing suppliers' practices was not completed during the 2023 reporting period, East Coast Kia will be implementing a process in which suppliers prove due diligence in preventing any modern slavery within their supply chain.

Effectiveness and Next Steps

East Coast Kia is committed to continuous improvement with respect to its operations and supply chain due diligence to reduce and prevent risks of modern slavery. During the next reporting period we plan to begin the following key activities to improve our understanding and management of modern slavery risks:

1. Further Develop Due Diligence Process:

Undertake due diligence when considering taking on new suppliers, and regularly review its existing suppliers. Due diligence and reviews to include:

- reviewing Kia Canada due diligence processes which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- taking steps to identify substandard suppliers' practices.
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular.
- using databases where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular.
- terminate business relationships with suppliers who seriously violate our supplier code of conduct.

2. Develop general modern slavery awareness training for employees to increase awareness and understanding of modern slavery and the risks across our operations and supply chain.

3. Develop a process to enable the organization to assess our effectiveness in preventing and reducing risks of modern slavery.

4. Update our policies and practices, such as our Code of Business Conduct to incorporate the provisions and principles of our Modern Slavery Statement.

Approval

This Report has received approval from East Coast Kia's Board of Directors.

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 listed above.

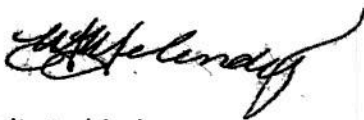
Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Full name: Michelle Melendy

Title: President

Date: May 30, 2024

Signature:



I have the authority to bind:

BarMax Auto Ltd o/a East Coast Kia