

CANADIAN MODERN SLAVERY ACT

COMPLIANCE REPORT

CDK GLOBAL (A BROOKFIELD BUSINESS PARTNERS PORTFOLIO COMPANY)

To: Cameron Williams
From: Alexandra Darrow
CC: Michael Morsch
Velda Berryman
Date: May 8, 2024
Re: CDK Supplier Modern Slavery Assessment Process and Implementation

INTRODUCTION: CDK Global is committed to conducting its business with integrity and respect for human rights. As part of CDK’s commitment to corporate social responsibility, CDK recognizes the importance of addressing modern slavery and human trafficking in our operations and supply chain. This report outlines CDK’s approach to mitigating the risk of modern slavery in our business activities.

COMPANY PROFILE: CDK Global is a leading provider of cloud-based software to dealerships and Original Equipment Manufacturers (“OEMs”) across automotive and related industries. CDK’s cloud-based, software as a services (“SaaS”) platform enables dealerships to manage their end-to-end business operations including the acquisition, sales, financing, insuring, repair, and maintenance of vehicles. By automating and streamlining critical workflows, the integrated platform of modern solutions enables dealers to sell and service more vehicles by creating simple and convenient experiences for customers and improves their financial and operational performance. Understanding that our products and services are relied on by businesses in the automotive sector, CDK recognizes the responsibility to uphold human rights throughout our operations and supply chain.

POLICY STATEMENT: Committed to ensuring that its business operations and supply chain are free from of forced labor, slavery and human trafficking, CDK expects its employees, suppliers and business partners to adhere to the highest ethical standards and comply with all applicable laws and regulations related to modern slavery.

RISK ASSESSMENT: CDK implemented a program to assess the risk of modern slavery in its operations and supply chain. This included identifying and evaluating those business sectors, activities, geographies, and relationships within the technology and software industry where the risk exposure related to modern slavery was most likely to occur. Utilizing Dun and Bradstreet reporting and supplier questionnaire assessments, CDK identifies areas of potential vulnerability. If a concern is flagged or reported, a process has been established to escalate to a selected CDK team for further review and to take appropriate measures to mitigate the risk of modern slavery.

DUE DILIGENCE: CDK conducts due diligence on new suppliers and business relationships to ensure they share our commitment to human rights and ethical business practices. This includes performing an assessment of supplier policies and procedures related to modern slavery and including representations and warranties specific to combatting modern slavery as well as contractual rights to conduct audits where necessary. In addition, CDK provides targeted training to those employees who engage with suppliers, identify and select suppliers, and purchase products and services as well as negotiate supplier contracts to raise awareness related to the signs of modern slavery and how to report any such concerns employees may observe. Training modules address the specific business risks of CDK, as a provider of software as a service (SaaS) solutions and services. CDK identified suppliers to which to send notifications of CDK's commitment to combat modern slavery.

POLICIES/CODES: CDK maintains a Supplier Code of Conduct that sets out CDK's expectations regarding the ethical behavior and business practices it requires of its suppliers. The Supplier Code of Conduct also includes provisions that address unfair labor practices and human trafficking. Suppliers are expected to adhere to these standards and take appropriate measures to ensure compliance throughout the Supplier's own supply chain. In addition, CDK has recently adopted and posted a separate standalone Human Rights Policy.

REPORTING: CDK now assesses its strategic and critical suppliers as well as new suppliers on an ongoing basis to ensure compliance with CDK policies and standards specific to modern slavery. In addition, CDK now negotiates suppliers' contracts to include terms that reserves the right for CDK to audit suppliers and to investigate any reports of potential modern slavery violations. CDK encourages its employees, suppliers, and any other stakeholders to report any concerns related to modern slavery.

Concerned parties can report suspected incidents, grievances and concerns related to modern slavery by contacting CDK's Ethics and Compliance Office by emailingethics@cdk.com or the CDK Ethics Hotline located at: <https://secure.ethicspoint.com/domain/media/en/gui/68077/index.html>.

CONCLUSION: CDK is committed to taking a proactive approach to preventing modern slavery and human trafficking in its business activities. We will work collaboratively with our employees, suppliers, and stakeholders to uphold human rights and ethical standards throughout CDK's operations and supply chain.

**CDK GLOBAL CANADIAN MODERN SLAVERY COMPLIANCE REPORT
CENTRAL TOPCO, INC./CDK ATTESTATION 2024 REPORTING YEAR**

In accordance with the requirements of Canada's Forced and Child Labour in Supply Chains Act ("Act"), and in particular section 11 therein, I attest that I have reviewed the information contained in the Canadian Modern Slavery Compliance Report ("Report") for Central Topco, Inc./CDK Global. 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 2024 reporting year.

Full name : Cameron Williams

Title: Executive Vice President and General Counsel

Date: May 13, 2024

Signature:  _____

As Executive Vice President and General Counsel for Central Topco, Inc./CDK Global I have the authority to bind Central Topco, Inc. and its affiliated entities.