



GANANOQUE MOTORS LTD. – 439 KING STREET E, GANANOQUE ON K7G 1G9

May 29th, 2024

This report, issued by Gananoque Motors Ltd. (“**Gananoque Motors**”) in accordance with section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”), covers the fiscal year ending on December 31st, 2023. It outlines the measures taken to prevent and mitigate the risk of forced labour, child labour and other forms of slavery (“**Modern Slavery**”) in the production of goods both domestically and internationally, including goods imported into Canada.

Under the Act, certain companies, including Gananoque Motors, are required to produce and file an annual report with the Minister of Public Safety and Emergency Preparedness of Canada. The report must, among other things, describe the Modern Slavery risks within the organization, as well as the risk mitigation measures implemented to address them. Completed reports must be approved by a company’s board of directors, and must be made available to the public, including by publishing them on their websites. This is Gananoque Motors’s first annual report under the Act.

1. Structure, Activities and Supply Chains

a. Structure

Gananoque Motors is a family-owned corporation, organized under the provincial laws of Ontario with its head office and registered address at 439 King Street East, Gananoque, Ontario, K7G 1H9.

b. Activities

Gananoque Motors operates a Chevrolet, Buick, GMC, and Cadillac dealership in Gananoque, Ontario. The dealership’s operations include vehicle sales, vehicle parts sales, and vehicle repair work, primarily serving customers located in Eastern Ontario.

As of the date of this report, Gananoque Motors employs 89 people, all situated in the province of Ontario. Its employees include those in Accounting, Administration, Management, General Maintenance, Parts, Sales, and Service.

c. Supply Chains

Gananoque Motors primarily sources goods from suppliers based in Canada, including, but not limited to:

- Benson Auto Parts;
- Distribution Stox; and
- Leader Auto Resources.



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Gananoque Motors also has some suppliers situated in the United States of America.

As a certified dealer, Gananoque Motors operates under contracts for sales and service with its main Original Equipment Manufacturer, General Motors of Canada Company. For all vehicles, parts, equipment, and services covered by those agreements, Gananoque Motors refers you to their submissions.

2. Policies and Due Diligence Processes

Every employee, officer, and director of Gananoque Motors is expected to act honestly, ethically, with integrity and in compliance with applicable laws and regulations.

Gananoque Motors's Dealer Principal adopted a Code of Business Conduct and Ethics ("**Code of Conduct**") as a guide that is intended, among other things, to sensitize such individuals to significant legal and ethical issues that arise and to the mechanisms available to report illegal or unethical conduct and provide assurance that reporting of questionable behavior is protected and encouraged.

Compliance with the Code of Conduct is mandatory for all Gananoque Motors's employees, managers, and directors.

The Code of Conduct commits Gananoque Motors to respecting human rights both within the company and with those with whom it does business. Gananoque Motors respects human rights by seeking to avoid infringing on the rights of others and seek to address adverse human rights impacts with which Gananoque Motors may become involved.

Gananoque Motors's management team assumes the primary responsibility of providing a safe, healthy environment for its employees and the public. Gananoque Motors will comply with its duties under Ontario's *Occupational Health and Safety Act* ("**OHSA**"), such as taking every reasonable precaution for the protection of its workers in the workplace. For Gananoque Motors, the safety of its employees and the public is paramount.

3. Forced Labour and Child Labour Risks

Gananoque Motors does not perceive any significant risk of Modern Slavery in its Canadian operations. All of the company's employees work in Canada, which is characterized by a low prevalence of Modern Slavery, minimal vulnerability to Modern Slavery, and a robust government response to such issues. Additionally, Gananoque Motors's workforce is composed of skilled, qualified, and experienced individuals.

Gananoque Motors acknowledges that certain manufacturing regions and materials are associated with higher Modern Slavery risks due to prevalence in specific countries. In part to



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mitigate these risks, Gananoque Motors commits to engaging its suppliers in an ongoing dialogue about the risk of forced labour and child labour in the company's common supply chains and identifying strategies to avoid or eliminate these practices in those supply chains.

Gananoque Motors has not become aware of any incidents of Modern Slavery in its operations or concerning any of its suppliers.

4. Remediation Measures

If Gananoque Motors was to become aware of or uncover potential or confirmed instances of Modern Slavery within its supply chains, it would conduct an investigation and implement suitable remedial actions, which may involve stopping, preventing, or reducing any negative impacts. During the last fiscal year, it did not detect any cases of Modern Slavery in its supply chains. As a result, no remedial actions were necessary, including those aimed at remediating any loss of income on vulnerable families that results from any measure taken to eliminate the use of Modern Slavery in its activities and supply chains.

5. Training

During Gananoque Motors's onboarding process, a variety of mandatory training courses are administered to enhance knowledge and skills in human rights and occupational health and safety.

Human rights training typically focuses on understanding and applying Ontario's *Human Rights Code*, and addresses issues such as workplace discrimination, harassment, and accessibility. With respect to occupational health and safety, Gananoque Motors's mandatory training courses ensure its compliance with the OHSA. These courses are accessible through its human resources information system ("HRIS") app and include, but are not limited to:

- *Accessibility for Ontarians with Disabilities Act Awareness;*
- *Ontario's Human Rights 101 Awareness;*
- *Personal Information Protection and Electronic Documents Act Awareness;*
- *Workplace Violence & Harassment Awareness;* and
- *Employee Health & Safety Awareness.*

6. Assessing our Effectiveness

The Dealer Principal and the management team reviews and approves Gananoque Motors's policies, including its Code of Conduct, all of which are reviewed annually. Additionally, the Dealer Principal and the management team monitors compliance with the Code of Conduct and its



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related key policies and procedures and oversees training initiatives implemented to support compliance. Gananoque Motors regularly reviews the due diligence processes conducted prior to engaging or re-engaging suppliers. Finally, in pursuit of its commitment to ensuring that forced labour and child labour are not being used in its business and supply chains, Gananoque Motors will continue to monitor applicable laws and regulations and will mitigate the risk through various methods including, but not limited to, engaging third party consultants to conduct independent risk assessments of Gananoque Motors’s suppliers if deemed necessary.

ATTESTATION

This Report has been approved by Gananoque Motors’s Dealer Principal on May 29th, 2024.

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 due 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.

Signed by

Name: Jamie Hall

Title: Director of Operations

I have the authority to bind Gananoque Motors Ltd.