

# **MODERN SLAVERY ACT**

Valentine Volvo

MAY 2024

# TABLE OF CONTENTS

- INTRODUCTION ..... 2
- OUR BUSINESS ..... 2**
- ABOUT ..... 2
- ACTIVITIES ..... 2
- SUPPLY CHAINS ..... 2
- IDENTIFICATION OF RISKS ..... 3
- PREVENTION AND RISK REDUCTION ..... 3
- POLICIES AND PROTECTIONS ..... 4**
- HUMAN RIGHTS POLICY ..... 4
- SUPPLIER CODE OF CONDUCT ..... 4
- YOUNG WORKER POLICY ..... 4
- WHISTLEBLOWER POLICY ..... 4
- CODE OF CONDUCT ..... 4
- WORKFORCE AND DUE DILIGENCE COMMITMENT ..... 4**
- REMEDATION ..... 5
- TRAINING ..... 5
- ASSESSING THE EFFECTIVENESS OF THE WYANT GROUP'S APPROACH ..... 5
- APPROVAL AND ATTESTATION ..... 5**

## **INTRODUCTION**

In Canada, the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the *Modern Slavery Act*) came into effect on January 1, 2024. Implemented by Public Safety Canada, the Act requires annual reporting on our due diligence activities related to the prevention of forced and child labour in our supply chains.

This Report constitutes the first report prepared by Valentine Volvo pursuant to Canada's new Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending December 31, 2023. It sets out the steps taken to prevent and reduce the risk of forced labour or child labour in the organization's supply chains. This Report will be published annually and will provide insight into Valentine Volvo's ongoing commitment to protect Human Rights and the reduction in the risk of forced labour or child labour in Valentine Volvo's operations and supply chains.

Valentine Volvo is dedicated to responsible and ethical business practices in its operations, treatment of employees, customers and with business partners, vendors and supply chains.

## **OUR BUSINESS**

### **About**

Valentine Volvo began business in 1946 under the name of Halford and Valentine Ltd. Since then, Valentine Volvo has been owned and managed by three generations of the Valentine family

### **Activities**

Valentine Volvo is a business that sells new and used vehicles, services vehicles (general maintenance, and repair of vehicles), sells vehicle parts, and automotive detailing and car wash services.

### **Supply Chains**

Valentine Volvo's strives to work with suppliers and business partners who share the same commitment to a positive social environment.

Valentine Volvo's main supply chain consists of the following:

- Automotive Original Equipment Manufacturers (OEM) (vehicles and parts)
- 3<sup>rd</sup> party parts suppliers
- IT providers
- Operation Services (i.e. office supplies, office equipment, facility infrastructure, training)

## **Identification of Risks**

Valentine Volvo's assessment of its risk for forced labour and child labour is low. Valentine Volvo follows all employment and Human rights legislation as mandated by the province it is operating in.

The Valentine Volvo's main suppliers are the OEMs for the various automotive brands within the group. Valentine Volvo has identified that some of the procurement of materials, parts and manufacturing could be in higher risk areas for forced labour and child labour.

The manufacturers and other main suppliers that Valentine Volvo has partnered with have provided their reports or attestations stating that their procurement and manufacturing of products meets all requirements of Bill S-211. Valentine Volvo expects that its other manufacturers and main suppliers will also state this and if they do not, Valentine Volvo will follow up with them to ensure that the manufacturing of vehicles and procurement of materials and parts is not contributing to modern slavery.

Valentine Volvo is continuing to review, understand and search out other opportunities on how it can further reduce the risk of forced labour and child labour.

## **Prevention and Risk Reduction**

During the reporting period Valentine Volvo took the following steps to prevent and reduce the risks of forced labour and child labour internally and within its supply chain:

- Reviewed internal policies, procedures and practices
- Updated its Human Rights policy
- Established first level suppliers and reviewed their policies and commitment to Human Rights and the prevention of forced labour and child labour
- Developed a supplier code of conduct

## **POLICIES AND PROTECTIONS**

### **Human Rights Policy**

Valentine Volvo Human Rights Policy commits to high standards of ethical business behaviour in all aspects of its business practices and operations and that it does not tolerate forced labour or child labour in its operations or supply chain.

### **Supplier Code of Conduct**

Valentine Volvo Supplier Code of Conduct details, among other things, its expectation from its suppliers that they will not participate in forced labour or child labour and will comply with all applicable provincial and federal laws.

### **Young Worker Policy**

Valentine Volvo ensures that there is reduced risk of forced labour or child labour in operations through strict adherence to provincial and federal labour laws. For example, consistent with Alberta labour legislation, Valentine Volvo does not employ anyone under the age of 14 and follows all applicable young worker restrictions for employees under the age of 16.

### **Whistleblower Policy**

Valentine Volvo has established an anonymous means for its employees to communicate concerns regarding forced labour and child labour or any other concerns they may have through the onsite locked submission boxes in our customer waiting area and in our staff lunch room.

### **Code of Conduct**

Valentine Volvo and its employees adhere to a standard of integrity, and ethical and professional conduct. This ensures that the work environment is safe, comfortable, and productive. Employees should be respectful, courteous, and mindful of the feelings and needs of others. General cooperation and respect between all employees, customers and vendors/suppliers is expected.

## **WORKFORCE AND DUE DILIGENCE COMMITMENT**

Valentine Volvo expects that the suppliers we do business with have similar values and business practices that we do and that they ensure all laws and regulations are followed both federally and provincially. Valentine Volvo will continue to review and assess its current suppliers. Any new supplier that we choose to Partner with will be required to provide an attestation of their compliance to the Modern Slavery Act or provide a copy of their annual report. They will also need to agree to our Supplier Code of Conduct which states that the supplier will not participate in forced labour or child labour in the supplier's operations and supply chain.

## **Remediation**

As Valentine Volvo did not find any evidence of forced labour or child labour or the loss of income to the most vulnerable families that are affected by the elimination of forced or child labour in its activities and supply chains, we did not implement any remediation measures in the 2023 fiscal year.

## **Training**

In 2024 Valentine Volvo will be assessing if further training is required in addition to onboarding documents and policies. Valentine Volvo will review best practices in its industry as well as leaders in other industries on what training they are providing and will decide if further training is necessary.

## **Assessing the Effectiveness of Valentine Volvo Approach**

Valentine Volvo will continue to assess the effectiveness of its efforts to reduce the risks of child labour in its business and supply chain.

## **APPROVAL AND ATTESTATION**

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 or 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.

I have the authority to bind Valentine Volvo

A handwritten signature in black ink, appearing to read 'Paul Valentine', with a long horizontal stroke extending to the right.

Paul Valentine  
Dealer Principal  
Valentine Volvo