



1438 Youville Dr. Orleans, ON K1C 2X8  
Tel.: 613-841-1010 jimkeayford.com

*"Our goal is to provide the most honest and easy customer experience possible."*

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## **Commitment to Ethical Practices in Supply Chains**

### **Modern Slavery Act Annual Compliance Report**

Jim Keay Ford Lincoln Sales Ltd.

Reporting period: 2023

Submission Date: May 31, 2024



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## **1. Introduction**

This report is made on behalf of Jim Keay Ford Lincoln Sales LTD. ("Company") and describes the actions taken by the Company during the financial year ending December 31, 2023 to assess, prevent and reduce the risk that forced labour or child labour is used at any step in its operations and supply chains pursuant to the requirements of section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("Act"). This Report constitutes the first report prepared by the Company under the Act.

## **2. Structure, Activities and Supply Chains**

Situated in Ottawa, Ontario, Canada Jim Keay Ford Lincoln is a leading automotive retail store selling and servicing Ford and Lincoln vehicles, The Company specializes in the retail sale of motor vehicles and parts as well as comprehensive vehicle servicing and repairs and also operates a Fix Auto Collision Centre.

As a dealer of new and used vehicles and their parts, our supply chain is primarily based on the supply chain of automotive manufacturers. Specifically, as an authorized Ford and Lincoln dealer, the majority of the Company's procurement spend is with Ford Motor Company. Ford Motor Company Global Modern Slavery and Human Trafficking Transparency Statement for the Financial Year Ending on December 31, 2023 is publicly available at [global-modern-slavery-and-human-trafficking-transparency-statement.pdf \(ford.com\)](https://www.ford.com/global-modern-slavery-and-human-trafficking-transparency-statement.pdf)

We also purchase goods and services from other third party suppliers who are global automotive manufacturers. The purchase of good predominantly consists of parts purchases for service and collision vehicle repairs.

### **Governance Structure**

Jim Keay Ford Lincoln is a family-owned corporation, anchored by a governance structure centered around our Dealer Principal, who serves as the pinnacle of leadership and decision-making authority within our organization. This structure is reflective of our dealership's commitment to family values, ethical business practices, and a hands-on approach to management and operations.



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### **3. Policies and Due Diligence Processes**

At Jim Keay Ford Lincoln, we are steadfast in our commitment to ethical business practices, which include ensuring that our supply chain is free from forced labor and child labor. To uphold these standards, we have implemented comprehensive policies and due diligence processes designed to identify, assess, and mitigate these risks.

*Supply Chain Due Diligence Policy:* This policy outlines Jim Keay Ford Lincoln's commitment to ensuring that our supply chains are free from forced labor and child labor, in compliance with the "Fighting Against Forced Labour and Child Labour in Supply Chains Act" and supply chain due diligence principles. It sets forth our standards, procedures, and responsibilities to prevent, identify, and address forced labor and child labor in our supply chains.

*Supplier Code of Conduct:* All suppliers are required to adhere to our Supplier Code of Conduct, which sets forth our expectations regarding labor practices, including the prohibition of forced and child labor. Suppliers must confirm their compliance with these standards and demonstrate their adherence through transparent reporting and documentation.

*Regular Audits and Assessments:* To ensure compliance with our policies, we conduct regular audits and assessments of our suppliers. These evaluations are designed to identify any risks or violations related to labor practices, allowing us to take corrective action promptly.

### **4. Assessment of Forced Labour and Child Labour Risks**

The Company has not independently engaged in its own risk assessment with regards to forced labour or child labour in its supply chain. As the majority of the Company's supply chain is based on the supply chain of Ford Motor Company, it relies on the assessment undertaken by Ford Motor Company with regards to the extent of this risk.

### **5. Remediation Measures**

The Company has not identified any instances of forced labour or child labour in its supply chain, and so no remediation measures have been taken.



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#### **6. Remediation of Loss of Income**

The Company has not identified any instances where the measures it has implemented to eliminate forced labour or child labour from its supply chain has led to the loss of income, and so no remediation measures have been taken to address this issue.

#### **7. Training and Capacity Building:**

The Company provides awareness-raising activities and new policies are implemented and shared with all senior management to recognize, prevent, and report instances of forced or child labor. the goal of our policy is not only to comply with legal standards but also to foster a positive workplace culture that aligns with our dealership's values. Regularly updating and communicating our policies will help ensure they remain effective and relevant. A third party training is assigned to all senior management and department heads. The activities are mandatory, and developed both internally and externally.

#### **8. Effectiveness Assessment**

The Company has not taken any action to assess its effectiveness in addressing risks of forced labour and child labour in its activities and supply chains.

#### **9. Approval and Attestation**

This report has been approved by the Board of Directors of Jim Keay Ford Lincoln Sales LTD in accordance with section 11(4)(a) of the Act.

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.



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Full name: Jason Keay

Title: President

Date: May 28, 2024

Signature:

A handwritten signature in black ink, appearing to be "JK", written over a horizontal line.

I have the authority to bind Jim Keay Ford Lincoln Sales Ltd.

#### References

1. Public Safety Canada – Modern Slavery Act, Reporting Requirements:

[Prepare a report – Entities \(publicsafety.gc.ca\)](https://publicsafety.gc.ca)

2. Jim Keay Ford Lincoln Code of Conduct
3. Jim Keay Ford Supply Chain Due Diligence Policy