



## 2023 Forced Labour and Child Labour Report

### 1. Introduction

#### a. About this Report

In accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act, (the “Act”), Metro Ford Sales Ltd. 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 Metro Ford Sales Ltd. 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.

Metro Ford Sales Ltd. 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.

### 2. Structure, Activities and Supply Chains

#### a. Structure

Metro Ford Sales Ltd. is a single location, Ford Motor Company franchised automotive dealership located in Tsuut’ina Alberta, Canada.

As of December 31, 2023, Metro Ford Sales Ltd. has approximately 92 full-time employees located exclusively in Canada.

#### b. Activities

Metro Ford Sales Ltd.’s core operation consists of the ownership and operation of an automotive retail dealership.

Metro Ford Sales Ltd.’s activities include the following:

- selling new and used vehicles;
- selling and distributing parts, accessories;
- providing vehicle repair and servicing services; and





- provision of, or facilitation of, vehicle finance, insurance and warranty products related to the sale, purchase, or lease of vehicles.

### **c. Supply Chains**

Metro Ford Sales Ltd.'s supply chain includes:

- manufacture and assembly of vehicles and parts;
- importation of vehicles and parts;
- local transportation of vehicles and parts to dealerships and service centres; and
- local contracts for services (e.g., employees, cleaning, snow removal, etc.).

Metro Ford Sales Ltd. currently has a centralized procurement function, with procurement conducted through our dealership.

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

- vehicles (new and used); and
- vehicle parts.

Other expenditures include:

- consumables (vehicle related – fuel, oil, and lubricants)

## **3. Risks of Modern Slavery in Operations and Supply Chain**

### **a. Our Approach**

In seeking to prevent and reduce the risk that forced labour or child labour was used in our operations and supply chains, Metro Ford Sales Ltd. has:

- conducted a high-level internal assessment of the risks of forced labour or child labour in our activities and supply chain;
- embedded responsible business conduct into certain of our policies and practices.

### **b. Supply Chain Risks**

When considering the risks of modern slavery practices at Metro Ford Sales Ltd., attention was given to the potential for Metro Ford Sales Ltd. to cause, contribute to, or be directly linked to modern slavery through its operations and supply chain.





Metro Ford Sales Ltd.'s operation is based wholly within Canada, does not employ foreign workers and abides by the minimum age of work as defined by governing legislation, therefore, we believe Metro Ford Sales Ltd. is generally at low-risk from engaging in forced labour and child labour.

Our most significant supply arrangements relate to the purchase of new vehicles and parts from our original equipment manufacturer ("OEM"). The OEM from which Metro Ford Sales Ltd. purchases new vehicles and parts for resale is a large multinational organization with robust governance and business practices, characterized by geographically dispersed manufacturing and supply chains.

The manufacturing sector is at an increased risk of modern slavery where aspects of manufacturing are outsourced to geographical locations with higher instances of modern slavery practices. Metro Ford Sales Ltd. is working to better understand the supply chains of its OEM supplier and has reviewed the "Ford Motor Company Global Modern Slavery and Human Trafficking Transparency Statement for the Financial Year Ending on December 31, 2023".

Metro Ford Sales Ltd. acknowledges that the raw materials procurement process does not often take place from our direct, tier one supplier, but may occur further down our supply chain. This reduces our visibility over the raw materials used within our supply chain to produce components used in vehicle and parts manufacturing.

We acknowledge that there is potential risk for Metro Ford Sales Ltd.'s supply chain to cause, contribute to, or be directly or indirectly linked to actual or potential forced labour or child labour.

To date, Metro Ford Sales Ltd. has not identified any specific instances of forced labour or child labour in its supply chain. As such, no remediation activities have been undertaken by Metro Ford Sales Ltd.

## **4. Steps Taken and Due Diligence to Prevent and Reduce the Risk of Modern Slavery**

Metro Ford Sales Ltd.'s due diligence process is focused on the identification and management of modern slavery risks. Metro Ford Sales Ltd. recognizes that the embedding of responsible business conduct into our policies and practices is critical to our continuing efforts to strengthen our ability to assess our modern slavery risks and evaluate the effectiveness of Metro Ford Sales Ltd.'s policies and practices in this area.

### **a. Metro Ford Sales Ltd.'s Policies and Practices**

Metro Ford Sales Ltd.'s corporate governance framework is supported by a number of policies, documents and practices, several which affirm our stance on modern slavery.





## **b. Code of Business Conduct**

Metro Ford Sales Ltd.'s Code of Business Conduct requires Metro Ford Sales Ltd. employees to adhere to the highest ethical standards and to comply with all applicable laws.

More specifically, the Code of Business Conduct articulates the following: “You shall subscribe to, and work for, honesty in buying and selling and refuse to take part in all forms of improper business practices. You must comply with all legal requirements of any jurisdiction in which we do business and with all contractual obligations. We conduct business in an ethical manner wherever we operate and do not tolerate bribery, corruption or any other unethical practices even where they are condoned or accepted, either tacitly or explicitly, by the law of the land or by the authorities in question.”

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.”

## **c. Silent Witness Policy**

Metro Ford Sales Ltd.'s Silent Witness Policy encourages the confidential reporting of questionable business practices, illegal, dishonest or fraudulent activities. Any allegations of these wrongdoings will be further investigated under the Silent Witness Policy.

Taken together, Metro Ford Sales Ltd.'s Code of Business Conduct and Silent Witness Policy seek to ensure that the conduct of all Metro Ford Sales Ltd. employees and overall business operations are in accordance with our corporate values, policies and expectations and at all times remain compliant with the Act.

## **d. Reviewing our Suppliers' Practices**

Metro Ford Sales Ltd. will consider requesting the inclusion of a provision in certain contracts in which suppliers or service providers covenant that they will comply with all applicable laws and/or confirm that neither they nor their supply chains engage in or are aware of any modern slavery within their supply chain.

In implementing contractual affirmation procedures, Metro Ford Sales Ltd. will take a contextual approach based on: (1) the perceived risks associated with the supplier or service provider; (2) the length of the business relationship between Metro Ford Sales Ltd. and the supplier or service provider; and (3) Metro Ford Sales Ltd.'s understanding of the strength of the supplier's or service provider's own human rights and modern slavery policies and practices.





## 5. Effectiveness and Next Steps

Metro Ford Sales Ltd. 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. Develop general modern slavery awareness training for those involved in procurement which will continue building Metro Ford Sales Ltd.'s awareness and understanding of modern slavery and the risks across our operations and supply chain;
2. Take actions to assess our effectiveness in preventing and reducing risks of modern slavery; and
3. Updating our policies and practices, such as our Code of Business Conduct to incorporate the provisions and principals of our Modern Slavery Statement.

## 6. Approval

This Report has received approval from Metro Ford Sales Ltd.'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: Reginald Pattemore**

**Title: President**

**Date: May 13, 2024**

**Signature:** 

I have the authority to bind Metro Ford Sales Ltd.

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