

NCS



Forced Labour Annual Report

Bill S-211

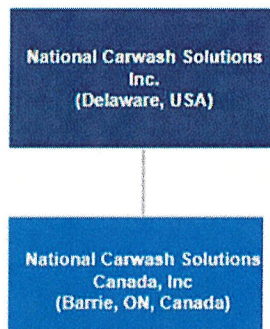
Updated May 2024

Bill S-211 Annual Report for the Financial Year ended Dec 31, 2023

This statement is made pursuant to Bill S-211, "An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff". This statement outlines the approach and initiatives by National Carwash Solutions Canada (NCS Canada) to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing Jan 1, 2023 and ending Dec 31, 2023.

Organizational Structure

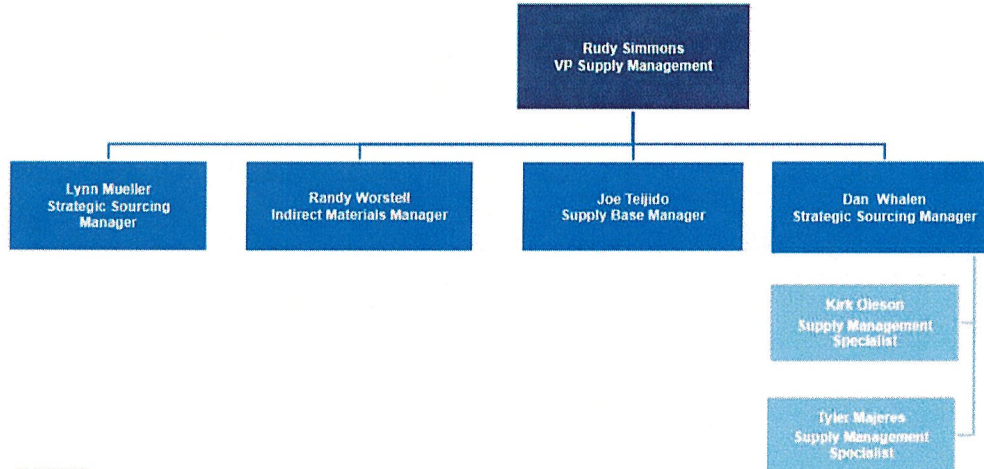
National Carwash Solutions Canada Inc. was established on March 5, 2013. It trades under the business name **National Carwash Solutions Canada Inc.** (NCS Canada) with its head office at 220 John St, Barrie, Ontario, L4N2L2.



Supply Chain

NCS Canada's supply chain comprises raw materials, purchased components, and services that enable the manufacturing, distribution, installation, and repair of car wash equipment, parts, chemicals, and solutions. We partner with roughly 250 suppliers located in multiple countries. The vast majority of our supply partners are located in North America, with a small number operating out of Taiwan (5% of total spend in 2023), China (3% of total spend in 2023), Italy (3% of total spend in 2023), and Bulgaria (1% of total spend in 2023).

Internal Supply Management Departmental Structure



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Risks in Supply Chain

At NCS Canada, we take our responsibility seriously when it comes to human rights and ethical business practices. Our commitment extends beyond legal requirements. We believe that respecting human rights is not just a legal obligation but a moral imperative. By working together with our partners, we strive to create a supply chain that is free from exploitation and upholds the dignity of all workers.

In reviewing our supply chain there are a limited number of risks that are evident. These risks are associated with our overseas supply partners that engage in manufacturing and assembly operations, mainly relating to electrical components, motors, foam, and plastic molded assemblies. Overseas suppliers represented 12% of our annual spend in 2023.

Risk Assessment & Actions Taken

As part of our commitment to transparency and accountability, we actively work to assess, prevent, and reduce the risk of forced labor and child labor in our supply chain. See below for a list of actions employed to assess and mitigate the risks that we've identified in our supply chain.

Code of Conduct

A link to our “Supplier Code of Conduct” is prominently displayed on the homepage of our global website (www.ncswash.com). This document reinforces our expectations from suppliers, including the critical requirement of abiding by labour and human rights laws. The first bullet point in this document states that child labour and forced labour are strictly forbidden, and workers should have reasonable working hours, fair wages, and safe working conditions. Suppliers must comply with all aspects of this Code of Conduct to retain their current partnership with NCS or to be selected as an NCS supplier. The Code of Conduct goes on to state requirements around Health & Safety, Environmental Responsibility, Ethics & Integrity, and Procurement Strategy.

Code of Ethics and Business Conduct

NCS reviewed the “Code of Conduct and Business Ethics” on June 22, 2023 and can be found on our company site by clicking [here](#). The code details NCS’s values and outlines the ethical framework that guides the companies’ business practices.

Monitoring & Auditing

In the fourth quarter of 2023, NCS Canada partnered with the 3rd party quality management consulting & auditing firm Trigo Group to perform an on-site supplier audit at one of our key overseas supply partners in China. Although this audit was mainly focused on quality management practices, they also engaged the supplier in areas such as production & warehousing space, equipment, count and skillset of workers, and hours of operation. These audits continued into 2024 at 3 more overseas supply partners located in Asia and Europe.

Onboarding & Engagement

We engage with our suppliers to ensure they share our commitment to human rights. We communicate our expectations and encourage them to adopt responsible practices. As part of the onboarding process, new supply partners are asked to complete, sign, and return a supplier onboarding form which contains the following information:

- Location (country) of Tier 1, 2, and 3 suppliers
- % of raw materials originating overseas
- Certification that forced labour and/or child labour is not and will not be used within the company’s products and services
- Compliance to applicable occupational health and safety standards
- Compliance to applicable environmental regulations

This form was issued to new suppliers starting in the third quarter of 2022, and work is currently being done to capture declarations from any suppliers that were added prior to that time.

Preference for Local and Domestic Supply Partners

At NCS Canada, we recognize that our supply chain decisions can have a significant impact on communities and the well-being of workers. As part of our commitment to responsible business practices, we actively prioritize local and domestic suppliers. Local and domestic suppliers are often subject to the same legal and regulatory frameworks as our company, and we can more effectively monitor working conditions, labor practices, and environmental impact when suppliers operate within our own jurisdiction. By partnering with local and domestic suppliers, we reduce the risk of human rights violations. We can engage directly with these suppliers, understand their practices, and address any concerns promptly. Our commitment to fair wages, safe working conditions, and respect for human rights is reinforced through these partnerships. We actively seek partners who share our commitment to ethical conduct, diversity, and inclusion.

Training

At NCS Canada we provide our employees with diversity, equity, and inclusion training during orientation to ensure each new hire is aware of the importance of celebrating the diverse nature of our workforce. Additionally, we ensure all employees are educated on employment standards topics, such as maximum hours of work and overtime guidelines, as per their applicable provincial legislation. This is completed during orientation, and we provide refresher training regularly and/or additional training when legislation changes.

NCS Canada's Code of Ethics is shared with each employee to ensure they understand that all areas of business are to be driven by the six commitments NCS makes to their external and internal stakeholders. These six commitments include:

- Honest and ethical conduct;
- Using good judgment;
- Taking responsibility for any mistakes and ensuring that these are corrected or addressed;
- Avoiding actual or potential conflicts of interest;
- Full, fair, accurate, timely and understandable financial disclosure in reports and documents;
- Compliance with any and all applicable laws, rules and regulation.

These commitments govern how we manage our external partnerships, our recruitment practices, and the policies and procedures we implement for existing employees. NCS strives on an ongoing basis to be an example to the manufacturing industry and to our partners on the fair treatment of all employees. We continuously assess our policies, practices and procedures to determine where we can improve as can be seen in our 5-year AODA Plan and our 5-Year Forced Labour Plan.

Sign Off

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending Dec 31, 2023. It has been issued on behalf of National Carwash Solutions Canada (NCS Canada) and approved by National Carwash Solutions' board of directors.

X 

Board of Director Member Name

X JESSEWORTH

Board of Director Member Signature

X 5/30/24

Date