

Annual Report on Forced Labour and Child Labour in Supply Chains

This report has been prepared in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act. It outlines the policies and procedures that Newtoy Operations Inc., operating as NewRoads Toyota Newmarket (“NewRoads Toyota”) has implemented and will continue to implement to prevent and reduce the risk of forced labour and child labour in our supply chain.

1. Steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any stage of the production of goods in Canada or elsewhere by the Entity or of goods imported into Canada by the Entity:

NewRoads Toyota has mapped out our supply chains in an effort to assess the risk of forced labour and/or child labour in our activities and supply chains.

We understand that our primary supply chain partner is extraordinarily complex, involving many tiers of suppliers that directly or indirectly supply raw materials, components and services from locations across the globe to Toyota’s global facilities. This supply chain complexity frequently prohibits Toyota from engaging with each supplier in its supply chain. Nonetheless, Toyota Canada would be involved in communicating their standards in this legislative process to help eliminate slavery and human trafficking from Toyota’s supply chain.

Additionally, we have internal controls in place to ensure that any new employees hired are recruited voluntarily. This takes place at our interview stage, where we meet with the candidate and ask very specific screening questions noted below.

2. Organizational Structure, Activities and Supply Chains:

NewRoads Toyota is a corporation founded in 2018 in Ontario, Canada.

The services that NewRoads Toyota provide include the sales of new and used vehicles, vehicle financing options, vehicle servicing and repairs and the sale of vehicle parts in Canada. NewRoads Automotive Group has a dealer agreement with Toyota Canada.

All employees are located in Canada.

All activities are conducted in Canada.

NewRoads Toyota is controlled by an individual that controls other operating entities within the retail automotive industry.

3. Policies and due diligence processes in relation to forced labour and child labour:

NewRoads Toyota is committed to preventing forced labour and child labour by following employment screening procedures for all prospective employees. This includes, but is not limited to, the completion of a job application, questionnaire, resume screening and enrolling each new employee into our HR system that requires completion of an employee profile, including personal information.

Furthermore, the questionnaire used in our screening process includes inquiries to ascertain candidates' eligibility to work in Canada, possession of a valid social insurance number and/or driver's license, and in cases where candidates appear too young, we may conduct additional age verification before making a hiring decision.

4. Parts of the entity's business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk:

The area within our business that likely poses the greatest risk of forced or child labour lies within our parts and vehicle supply chain and as noted above, the vast majority of our supply is from Toyota. We understand that they have processes in place to prevent forced labour and child labour.

In an effort to assess any potential risk, we have reviewed the anti-slavery and human trafficking statements from our manufacturers. We intend to continue this dialogue with our suppliers and challenge what measures they are taking to prevent forced or child labor in their manufacturing processes.

5. Measures taken to remediate any forced labour or child labour:

No remediation activities have been undertaken as no specific instances of forced labour or child labour have been identified. However, should we identify any forced labour or child labour, we will take appropriate measures to ensure the issue is addressed.

6. Measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains:

No measures have been taken in this area as we have not identified any vulnerable families that have had a loss of income as a result of actions taken by NewRoads Toyota to eliminate forced labour or child labour from our supply chain.

7. Training provided to employees on forced labour and child labour

As indicated above, we have trained our managers to use a standard screening questionnaire when interviewing candidates. This includes questions to determine whether or not individuals are eligible to work in Canada, whether or not they have a valid social insurance number and/or drivers license and if they appear too young, we may

further investigate their age before hiring.

8. How we assess our effectiveness in ensuring that forced labour and child labour are not being used in our business and supply chains:

To the best of our knowledge, no instances of forced or child labor have been identified within our operations or supply chain.

Acknowledging the potential vulnerabilities within our operations that could be exploited for unethical practices, we commit to continuous monitoring of our operations and supply chain to prevent the incorporation of such practices into our business.

Approval of our Report

This report has been approved by the Board of Directors of Newtoy Operations Inc. on May 21, 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 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.

Full name: Michael Croxon

Title: President & CEO

Date: May 21, 2024

Signature:

"I have the authority to bind Newtoy Operations Inc."