



SAFEGUARDING HUMAN RIGHTS

Assessing and Enhancing Efforts to Combat
Forced Labour and Child Labour in Operations
and Supply Chains

Ontario Chrysler Jeep Dodge Inc.

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Introduction

This document outlines the formal procedures adopted by Ontario Chrysler Jeep Dodge Inc. to evaluate and ensure compliance with regulations and policies prohibiting forced labour and child labour within its business operations and supply chains, as outlined in Canada's Fighting Against Force Labour and Child Labour in Supply Chains Act (the "Canadian Act"). The assessment aims to uphold ethical standards, mitigate risks, and demonstrate commitment to social responsibility.

The assessment encompasses all aspects of Ontario Chrysler Jeep Dodge Inc.'s operations, including direct employees and major suppliers across the supply chain.

Operational Overview

Operating within a structured framework, as a Fiat Chrysler Automobile N.V. (FCA) dealership, functioning under the operational excellence standards of Stellantis N.V., Ontario Chrysler Jeep Dodge Inc. operates as a multifaceted entity engaged in vehicle sales, servicing, and aftermarket support. Its operational structure includes departments such as sales, finance, service, and parts. In terms of activities, the dealership facilitates vehicle sales through showroom displays, test drives, and negotiations, while providing financing options to customers.

Post-sale, it offers maintenance and repair services through its service center, along with the retail of genuine Chrysler, Jeep, Dodge, Ram, Mopar, and other affiliated parts and accessories. The dealership's supply chain involves procuring vehicles, parts, and accessories directly from Chrysler and its' affiliates manufacturing facilities and authorized suppliers. These goods are typically sourced from Chrysler's domestic production plants, distribution centers, and contracted manufacturers, ensuring quality and authenticity in the dealership's inventory.

Policy Framework

Ontario Chrysler Jeep Dodge Inc. adheres to regulations and policies prohibiting forced labour and child labour within its business operations and supply chains, as outlined in Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Canadian Act"). The following outlines Ontario Chrysler Jeep Dodge Inc.'s policy, aiming to underscore the dedication to combating forced labour and child

labour by systematically evaluating the potential risk of their occurrence within the organization and supply chain.

Purpose

The purpose of this policy is to demonstrate the commitment to contribute to the fight against forced labour and child labour by ensuring that the risk of forced/child labour being used in the supply chain is assessed. This policy reiterates that Ontario Chrysler Jeep Dodge Inc. management is committed to providing a cohesive working environment that fosters equality, mutual respect, protection, and human rights for all workers, including those employed within the supply chains. This policy applies to the company, those it does business with, including, but not limited to, suppliers, vendors, and contractors.

Definitions

CHILD LABOUR means labour or services provided or offered to be provided by persons under the age of 18 years. The work that these children do cannot be harmful to their health, interfere with their education or be mentally, physically, socially, or morally dangerous to them.

FORCED LABOUR means labour or service provided or offered to be provided by a person under circumstances that could reasonably be expected to cause the person to believe that their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service.

Implementation

POLICY STATEMENT

Ontario Chrysler Jeep Dodge Inc. will take all the appropriate legislative measures so that no Forced Labour or Child Labour occurs within our organization including the company, suppliers, vendors, and contractors.

PRACTICES AND MEASURES

The employer will verify the age of the employee at time of employment, training company workers, communicating the policy with anyone who the company does business with, including, but not limited to, suppliers, vendors, contractors. Additionally, as far as practicable, the dealership will ensure that forced/child labour has not been used in our

supply chain and will ensure that where possible vendors that can assure there is no forced/child labour will be the vendor of choice.

Reporting Obligation & Due Diligence

POLICY STATEMENT

Ontario Chrysler Jeep Dodge Inc. will submit an annual report on or before May 31st of each year outlining the prevention and reduction of risk that forced labour or child labour isn't being used within our organization or supply chain in relation to goods that are imported into Canada by the company.

PRACTICES AND MEASURES

The company will assess our supply chain to make sure we are mitigating the risk of forced/child labour in relation to our operations and supply chain. We will use vendors in our supply chain that adhere to our policy and legislation. The company will utilize ESG supportive and ethically sourced vendors where applicable in order to assure that regional workers have a fair opportunity for income.

Employee Expectations

POLICY STATEMENT

Ontario Chrysler Jeep Dodge Inc. expects that employees will assist in the fulfillment of responsibilities under this policy manual and all applicable laws. Ontario Chrysler Jeep Dodge Inc. recognizes that both the employer and the employee have obligations in maintaining a safe, compliant, and fair workplace.

PRACTICES AND MEASURES

Employees are expected to ensure understanding of this policy and issues around forced/child labour. Any employee who feels that there is a breach of this policy will inform their manager.

Risk Identification & Management

Risk Assessment

The dealership conducts a thorough risk assessment to identify potential areas of exposure to forced labour and child labour within its operations and supply chains.

This assessment considers geographical locations, industry-specific risks, and supplier relationships.

The assessment was conducted this year with the intention of prioritizing the reduction of risk that forced labour or child labour is used at any step of the production of goods and/or conduction of services with the dealership's suppliers and partners. Additionally, the review was rooted in ensuring compliance with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Canadian Act").

ENDORSEMENT OF INTERNATIONAL DECLARATIONS

Stellantis expresses commitment to various international human rights declarations, including the United Nation's universal declaration of human rights and the international labour organization's declaration on fundamental principles and rights at work. This aligns with the act's emphasis on upholding international standards.

SCOPE AND COMMITMENTS

Stellantis outlines its commitment to respect human rights across its operations and supply chain, consistent with the Act's focus on supply chain transparency and accountability.

PROHIBITION OF FORCED AND CHILD LABOUR

Stellantis explicitly states its stance against forced, compulsory, or child labour, echoing the Act's prohibition of such practices in supply chains.

TRAINING AND AWARENESS

Stellantis emphasizes awareness and training on human rights, which is crucial for compliance with the Act's requirements for due diligence processes and risk mitigation.

CONSEQUENCES OF NON-COMPLIANCE

Stellantis maintains a zero-tolerance approach towards non-compliance with human rights standards, with disciplinary actions including termination, aligning with the Act's emphasis on accountability.

REPORTING MECHANISMS

Stellantis provides avenues for reporting potential violations, including an Integrity Helpline, consistent with the Act's encouragement for effective reporting mechanisms within organizations.

Overall, Stellantis' Human Rights Policy demonstrates alignment with key principles of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, particularly in terms of commitment to international standards, prohibition of forced and child labour, training, consequences of non-compliance, and reporting mechanisms.

Supplier Due Diligence

Ontario Chrysler Jeep Dodge Inc. implements robust due diligence processes for evaluating and selecting suppliers. This includes assessing suppliers' labour practices, particularly those of Stellantis, given the association and close partnership.

Based on the provided Human Rights Policy of Stellantis, the potential risks of forced labour or child labour could include the following:

SUPPLY CHAIN RISKS

Stellantis acknowledges its commitment to respecting human rights throughout its supply chain. However, without robust monitoring and due diligence processes, there's a risk of forced labour or child labour occurring at various stages of the supply chain, especially in regions where labour standards may be lax.

LACK OF SUPPLIER COMMITMENT

While Stellantis expects its suppliers and business partners to adopt similar human rights principles, there's a risk that some may not fully comply. Without effective mechanisms to ensure supplier adherence to these standards, there's a risk of forced labour or child labour being present in the supply chain.

LIMITED AWARENESS AND TRAINING

Although Stellantis emphasizes mandatory training on human rights, the effectiveness of this training may vary, especially if it's not comprehensive or tailored to address specific risks related to forced labour or child labour. Insufficient awareness among employees and suppliers could lead to oversight of such issues.

INSUFFICIENT REPORTING MECHANISMS

While Stellantis provides avenues for reporting potential violations through its Integrity Helpline and other channels, there's a risk that incidents of forced labour or child labour may not be reported or adequately addressed due to fear of retaliation, lack of awareness, or cultural barriers.

INADEQUATE REMEDIATION PROCESSES

Stellantis states a zero-tolerance approach to non-compliance with human rights standards, including forced labour and child labour. However, the effectiveness of remediation processes depends on the thoroughness and timeliness of actions taken to address violations. Without robust remediation measures, the risk of continued exploitation of labour persists.

LIMITED OVERSIGHT AND AUDITING

While Stellantis mentions conducting audits and risk mapping to identify high-risk entities, the frequency and depth of these audits may vary. Insufficient oversight and auditing of suppliers and subcontractors could result in undetected instances of forced labour or child labour within the supply chain.

Overall, while Stellantis' Human Rights Policy outlines commitments to preventing forced labour and child labour, there are potential risks associated with ensuring compliance throughout its operations and supply chain. Addressing these risks requires comprehensive due diligence processes, effective monitoring mechanisms, continuous training, and robust remediation measures.

Prevention & Remediation

Monitoring & Auditing

Regular monitoring and auditing processes are conducted to assess compliance with labour standards. This includes internal audits, third-party audits, and assessment of industry standards regarding labour rights. with industry associations or initiatives focused on labour rights.

Training & Awareness

Employees receive training on the Ontario Human Rights Code, through Dealer Pilot, our human resources platform, which delves into identifying signs of discrimination, reprisal, and harassment, and how to address these issues within the workplace. More specifically, Ontario Chrysler Jeep Dodge Inc. requires employees complete a training course on forced and child labour in supply chains, which broadens employee awareness on forced and child labour, as well as how to identify and report suspected incidents. With the success of the aforementioned training courses, Ontario Chrysler Jeep Dodge Inc. is committed to continuing to evolve our human rights training to

ensure a focus on forced labour and child labour, reporting mechanisms, and the dealership's zero-tolerance policy towards such practices. Training programs are regularly assessed and updated to reflect evolving best practices and legal requirements.

Within the Dealer Pilot platform, employees are also required to read and acknowledge the Forced Labour and Child Labour in Supply Chain Policy prior to their employment start date. Employees are expected to ensure understanding of this policy and issues around forced/child labour. Any employee who feels that there is a breach of this policy will inform their manager.

Remediation

Per Stellantis' Human Rights Policy policies, there are specific steps taken for remediation in case of human rights violations, including those related to child labour and forced labour within our associated supply chains. Their policy establishes multiple channels through which employees can report violations, including reporting to immediate supervisors, Human Resources representatives, Compliance or Legal Departments, or via a dedicated channel called the Integrity Helpline. Anonymous reporting is allowed where permitted by local law. Reports of violations are tracked and investigated by trained investigators. The Integrity Helpline ensures a common, worldwide, and independent intake process. Reports are adjudicated and reported to appropriate Ethics and Compliance Committees. The policy explicitly states that Stellantis does not tolerate any retaliation against employees who report issues in good faith. The company protects whistleblowers and ensures confidentiality of provided data in accordance with its whistleblowing and non-retaliation policy. If a violation of human rights is confirmed, the policy mandates discipline proportional to the gravity of the violation, up to and including termination. Remediation measures are implemented commensurate with the action taken.

Within our dealership, employees are encouraged to report any incidents or suspected incidents of forced labour or child labour. Upon receiving reports, Ontario Chrysler Jeep Dodge Inc. would conduct thorough investigations and take appropriate remedial actions, including termination of relationships with non-compliant suppliers. To date, Ontario Chrysler Jeep Dodge Inc. has not identified any instance of forced labour or child labour internally or within its supply chain, and therefore have not needed to take any remediation measures.

Reporting & Continuous Improvement

In accordance with our commitment to upholding human rights and ethical business practices, we rigorously assess the effectiveness of our efforts to eradicate forced labour and child labour from our operations and supply chains. This section of our child labour report outlines our comprehensive approach to evaluating and enhancing our strategies in this critical area. We focus on three key pillars: reporting and transparency, stakeholder engagement, and continuous improvement. Through these efforts, we strive to ensure accountability, transparency, and ongoing progress in our journey towards a supply chain free from the exploitation of vulnerable populations.

Reporting & Transparency

An annual report detailing the dealership's efforts to address forced labour and child labour is provided to the Canadian government, highlighting the key policy framework, results of supplier policy assessments, and current and future commitments to ensure continued adherence to with Canada's Fighting Against Force Labour and Child Labour in Supply Chains Act (the "Canadian Act").

Stakeholder Engagement

Ontario Chrysler Jeep Dodge Inc. welcomes engagement with stakeholders, including customers, investors, and civil society organizations, to ensure transparency in communication of its efforts to prevent forced labour and child labour and solicit feedback on areas for improvement, should stakeholders inquire.

Continuous Improvement

Ontario Chrysler Jeep Dodge Inc. is committed to continuous improvement in its efforts to combat forced labour and child labour. Feedback mechanisms are available to welcome input from employees, suppliers, and other stakeholders to enhance policies, procedures, and practices.

Conclusion

Ontario Chrysler Jeep Dodge Inc. is committed to upholding the highest standards of ethical conduct and social responsibility. Through rigorous assessment, monitoring, and continuous improvement efforts, the dealership aims to ensure that forced labour and child labour are not present in its business operations or supply chains.

Approval and Attestation


This report has been approved by the Bourk Boyd, President of Ontario Chrysler Jeep Dodge Inc. 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 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 below.

Full name: Bourk Boyd

Title: President

Date: May 29, 2024



I have the authority to bind Ontario Chrysler Jeep Dodge Inc.