



5580 Parkwood Crescent, Richmond, B.C., Canada V6V 0B5
tel 604.278.8999

Forced Labour and Child Labour in Supply Chains Assessment

Introduction

This report is made on behalf of OpenRoad Auto Group Limited and OpenRoad Auto (Langley) Limited (collectively, the “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.

Structure, Activities and Supply Chains

The Company is a corporation, in which OpenRoad Auto (Langley) Limited is a corporation and wholly owned subsidiary of OpenRoad Auto Group Limited, based in Richmond, British Columbia. OpenRoad Auto (Langley) Limited is the operator of the Company’s BMW MINI Langley stores.

The Company specializes in the retail sale of motor vehicles and parts as well as comprehensive vehicle servicing and repairs. The Company has 33 locations across British Columbia, Ontario and Washington, USA. The Company’s key departments include Vehicle Sales, Service and Parts, Finance and Accounting, Legal, Marketing, Human Resources, Insurance and Finance and IT and Business Technology.

As a dealer of new and used vehicles, and their parts, the Company’s supply chain is primarily based on the supply chain of automotive manufacturers. Specifically, as an authorized Toyota, Honda, Lexus, Audi, Hyundai, Mazda, BMW, MINI, Rolls-Royce, Jaguar Land Rover, Porsche, Volkswagen, Mercedes, Subaru and Acura dealer (collectively, the “OEMs”) most the Company’s procurement spend is with the OEMs. For reference, the following OEMs have made public statements outlining their due diligence on their supply chain and due diligence:

- Toyota Canada Inc.: <https://www.toyota.ca/toyota/en/modern-slavery-report>
- Lexus, division of Toyota Canada Inc.: <https://www.lexus.ca/lexus/en/modern-slavery-report>
- Porsche Cars Canada Ltd.: <https://www.porsche.com/canada/en/aboutporsche/overview/compliance/humanrights/>
- We also purchase goods and services from other third-party suppliers and these goods are generally sourced within Canada.

Policies and Due Diligence Processes

The Company also utilizes three handbooks that individually refer to and adhere to employment and human rights legislation specific to British Columbia, Ontario and Washington. The Company has also implemented a comprehensive Whistleblower Policy that is intended to encourage employees and others to make good faith reports of suspected fraud, corruption or other improper activity contrary to the Company’s relevant handbook and or standard operating procedures.

The Company has not established procedures and policies to specifically review forced and child labour, it relies on the OEMs because they completely control the manufacture and supply of the vehicles and parts the Company utilizes.

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 most of the Company’s supply chain is based on the supply chain of the OEMs, it relies on the assessment undertaken by the OEMs with regards to the extent of this risk. For example, Toyota Canada Inc., Lexus division of Toyota Canada Inc. and Porsche Cars Canada Ltd. have detailed steps taken to prevent forced labour and child labour.



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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.

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.

Training

The Company provides optional training on issues related to human rights via its Human Resources department, which includes FAQs, information sessions and policies and procedures. This training is supplemented by ongoing support by the Company's Legal department and sustainability education, which has recently commenced by way of its establishment of an Environmental Social and Governance department. This training is carried out and available companywide.

Assessing Effectiveness

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.

Approval and Attestation

This report has been approved by the Board of Directors of OpenRoad Auto Group Limited in accordance with section 11(4)(b)(ii) 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.

Full name: Christian Chia

Title: Chief Executive Officer

Date: May 30, 2024

Signature: *Christian Chia*

I have the authority to bind OpenRoad Auto Group Limited.