

Supply Chains Report

1. Introduction

This report is submitted on a consolidated basis by Setay Motors Inc. , Image Automobiles Inc. , Guelph Nissan Infiniti Inc. , JP Motors Sales Inc. , Setay Holdings Limited, Guelph City Auto Holdings Inc., 2368068 Ontario Inc., Landlink Incorporated, Landlink Rymal Holdings Inc. , and Landlink Holdings Corporation and describes the actions taken by the Company during the financial year ending December 31, 2023 to access, 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.

2. Structure, Activities, and Supply Chains

The Company is an Automotive Dealer Group based in Hamilton, Ontario, with locations in Burlington, Ontario, and Guelph, Ontario. The Company specializes in the retail sales of motor vehicles, as well as fleet sales, and in-house leasing. Among other things, we offer retail sales of parts, comprehensive vehicle servicing and repairs, as well as body shop repairs.

As a dealer group of new and used vehicles and their parts, our supply chain is primarily based on the supply chain of automotive manufacturers. Specifically, as authorized General Motors Canada, Honda Canada, Nissan Canada, Infiniti Canada, and Mazda Canada dealer locations, the majority of the Company's procurement spend is with these original equipment manufacturers.

General Motors Canada: <https://www.gm.ca/en/home.html/>,

Honda Canada: <https://www.honda.ca/en/>,

Nissan Canada: <https://www.nissan.ca/>,

Infiniti Canada: <https://www.infiniti.ca/>,

Mazda Canada: <https://www.mazda.ca/>.

We also purchase goods and services from other third-party suppliers such as cleaners, contractors, etc. We ensure that due diligence is carried out by asking our suppliers to provide information on their own policies regarding their sourcing of goods and services, as well as their employment practices.

3. Polices and Due Diligence Processes

The Company will take appropriate measures to ensure no Forced Labour or Child Labour occurs within our organization including the company, suppliers, vendors, and contractors. The employer will verify the age of the employee at the time of employment, training company workers, communicating the policy with anyone who the company does business with, including, but not limited to, suppliers, vendors, and 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.

The Company 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. 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.

The Company expects that employees will assist in the fulfilment of responsibilities under this policy manual and all applicable laws. The Company recognizes that both the employer and the employee have obligations in maintaining a safe, compliant, and fair workplace. Employees are expected to ensure an understanding of this policy and issues around forced/child labour. Any employee who feels that there is a breach of this policy are asked to report to Human Resources, hr@queenstonautogroup.com. All reports will be gathered in good faith and will be investigated by the Company. If the Company, through the course of an investigation, discovers that modern slavery has occurred, in any form, the business relationship with the offending organization will immediately be terminated.

4. 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 the majority of the Company's supply chain is based on the supply chain of General Motors Canada, Honda Canada, Nissan Canada, Infiniti Canada, and Mazda Canada, it relies on the assessment undertaken by these OEMs with regards to the extent of this risk.

5. Remediation Measures

The Company has not identified any instances of forced labour in its supply chain, and so no remediation measures have been taken.

6. Remediation of Loss of Income

The Company has not identified any instances where the measures it 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.

7. Training

The Company provides training on Forced Labour and Child Labour in the Supply Chains. This training course is mandatory for all employees on our HRIS system, DealerPilot HR.

8. 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.

9. Approval and Attestation

- i) This report has been approved by the Chief Executive Officer of Setay Motors Inc. in accordance with section “11(4)(b)(i) 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 listen above.

Full Name: Gordon Albini
Title: Chief Executive Officer

Signature: : _____
Gordon Albini (May 31, 2024 17:12 EDT)

Date: 31/05/24

I have the authority to bind Setay Motors Inc.

- ii) This report has been approved by the Chief Executive Officer of Image Automobiles Inc. in accordance with section “11(4)(b)(i) 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 listen above.

Full Name: Gordon Albini
Title: Chief Executive Officer

Signature: : _____
Gordon Albini (May 31, 2024 17:12 EDT)

Date: 31/05/24

I have the authority to bind Image Automobiles Inc.

- iii) This report has been approved by the Chief Executive Officer of Guelph Nissan Infiniti Inc. in accordance with section “11(4)(b)(i) 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 listen above.

Full Name: Gordon Albini
Title: Chief Executive Officer

Signature: : _____
Gordon Albini (May 31, 2024 17:12 EDT)

Date: 31/05/24

I have the authority to bind Guelph Nissan Infiniti Inc.

- iv) This report has been approved by the Chief Executive JP Motors Sales Inc. in accordance with section "11(4)(b)(i) 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 listen above.

Full Name: Gordon Albini
Title: Chief Executive Officer

Signature:  _____
Gordon Albini (May 31, 2024 17:12 EDT)

Date: 31/05/24

I have the authority to bind JP Motors Sales Inc.

- v) This report has been approved by the Chief Executive Setay Holdings Limited in accordance with section "11(4)(b)(i) 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 listen above.

Full Name: Gordon Albini
Title: Chief Executive Officer

Signature:  _____
Gordon Albini (May 31, 2024 17:12 EDT)

Date: 31/05/24

I have the authority to bind Setay Holdings Limited.

- vi) This report has been approved by the Chief Executive Guelph City Auto Holdings Inc. in accordance with section "11(4)(b)(i) 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 listen above.

Full Name: Gordon Albini
Title: Chief Executive Officer

Signature: : _____
Gordon Albini (May 31, 2024 17:12 EDT)

Date: 31/05/24

I have the authority to bind Guelph City Auto Holdings Inc.

- vii) This report has been approved by the Chief Executive 2368068 Ontario Inc. in accordance with section “11(4)(b)(i) 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 listen above.

Full Name: Gordon Albini
Title: Chief Executive Officer

Signature: : _____
Gordon Albini (May 31, 2024 17:12 EDT)

Date: 31/05/24

I have the authority to bind 2368068 Ontario Inc.

- viii) This report has been approved by the Chief Executive Landlink Incorporated in accordance with section “11(4)(b)(i) 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 listen above.

Full Name: Gordon Albini
Title: Chief Executive Officer

Signature: : _____
Gordon Albini (May 31, 2024 17:12 EDT)

Date: 31/05/24

I have the authority to bind Landlink Incorporated

- ix) This report has been approved by the Chief Executive Landlink Rymal Holdings Inc. in accordance with section “11(4)(b)(i) 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 listen above.

Full Name: Gordon Albini
Title: Chief Executive Officer

Signature: : _____
Gordon Albini (May 31, 2024 17:12 EDT)

Date: 31/05/24

I have the authority to bind Landlink Rymal Holdings Inc.

- x) This report has been approved by the Chief Executive Landlink Holdings Corporation. in accordance with section “11(4)(b)(i) 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 listen above.

Full Name: Gordon Albini
Title: Chief Executive Officer

Signature: : _____
Gordon Albini (May 31, 2024 17:12 EDT)

Date: 31/05/24

I have the authority to bind Landlink Holdings Corporation.