

May 2024

REPORT for the 2023 Financial Reporting Year
Fighting Against Forced Labour and Child Labour in Supply Chains Act
Budds' Group of Companies

1. Introduction

This report is made on behalf of Stuart Budd & Sons Ltd., Budds' Hamilton Limited, Budds' Oakville Limited, and Budds' Motors Inc. ("Budds' Group of Companies") and describes the actions taken by the Companies 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 their 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 Companies under the Act.

2. Structure, Activities and Supply Chains

The Budds' Group of Companies are affiliated corporations based in Oakville, Ontario.

The Companies specialize in the retail sale of motor vehicles and parts as well as comprehensive vehicle servicing and repairs, with operations located in Oakville and Hamilton, Ontario.

As dealers of new and used vehicles and their parts, our supply chain is primarily based on the supply chain of automotive manufacturers. The Companies are franchised automotive dealers, operating under contracts for sales and service with the Canadian subsidiaries of the following Original Equipment Manufacturers (OEMs): Mazda Motor Corporation, BMW Group, Jaguar Land Rover Automotive, General Motors Company, and Subaru Corporation.

The majority of the Companies' procurement spend is with the Canadian subsidiaries of the aforementioned Original Equipment Manufacturers. For all vehicles, parts, equipment, and service covered by those agreements, we refer you to their submissions linked below.

Mazda Motor Corporation	This report addresses local and global policies of Mazda Motors UK. This report addresses local and global policies of Mazda Australia.	Mazda Motors UK –Slavery and Human Trafficking Statement 2021-2022 Mazda Australia Pty Ltd Modern Slavery Statement 2023
BMW Group	This report addresses the global policies of BMW Group	BMW Group – published on German website 2023

Jaguar Land Rover Automotive	This report addresses global policies of Jaguar Land Rover Automotive	Jaguar Land Rover Automotive UK Slavery and Human Trafficking Statement 2023
General Motors Company	This report addresses the global policies of General Motors Company	General Motors Company Anti-Slavery and Human Trafficking Statement
Subaru Corporation	This report addresses global policies of Subaru Corporation and its parent company, IM Group.	IM Group Modern Slavery Statement for January – December 2022 UK

We also purchase limited goods and services from other third-party suppliers, including after-market automotive parts, furniture and office supplies. The Companies require all suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains.

3. Policies and Due Diligence Processes

The Companies have do not have specific internal policies or due diligence processes in relation to forced labour and child labour. The Companies rely on all Suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their operations and supply chains.

Below is a summary of the due diligence processes and policies of the OEMs with whom the Companies are contracted.

Mazda Motor Corporation	Mazda Motor requires new suppliers to adhere to a Business Partner Code of Conduct, which includes guidelines on promoting labour and human rights within the supply chain. Mazda has established processes to identify and address risks through its operations and supply chain. For instance, the European Code of Conduct includes a Speak Up (Whistleblowing) Policy and provides training to all employees. Mazda conducts annual CSR Questionnaire to survey its suppliers.
BMW Group	BMW Group reviewed all process partners along their value-chain (own operations, employees, external production partners, retailers/importers, suppliers, joint ventures etc.) regarding potential human rights implications and are now developing appropriate measures to deal with identified risks and a risk monitoring system with key performance indicators. BMW will also update their BMW Group Code on Human Rights and Working Conditions to match legal requirements

	and develop new training material for various stakeholder groups, among other measures.
Jaguar Land Rover Automotive (JLR)	JLR’s measures include reports on granular data from suppliers, and detailed reviews of supplier information. JLR rolled-out self-assessment questionnaires to additional higher risk suppliers and commissioned a program of social audits at higher risk suppliers. JLR will implement supply chain traceability and risk-scanning tools to continue to seek further transparency within their supply chain to identify potential risks related to forced and child labour.
General Motors Company (GM)	General Motors has assessed supply chain risk related to human trafficking and forced labour, endorsing industry principles and supporting training, while maintaining relevant internal policies and procedures. General Motors is committed to the principles of United Nations Global Compact (UNGC) framework in areas of human rights, labour, the environment and anti-corruption. GM’s policies and procedures include sustainability ambition, code of conduct-winning with integrity, non-retaliation policy, training for employees and more.
Subaru Corporation	Measures taken by Subaru Corporation is the “Group Sustainable Futures”, which includes policies such as whistleblowing, business code of conduct, supplier code of conduct, equality and diversity, modern slavery and more.

4. Assessment of Forced Labour and Child Labour Risks

The Companies have not independently engaged in their own risk assessment with regards to forced labour or child labour in their supply chain. As the majority of the Companies’ supply chain is based on the supply chain of the aforementioned OEMs, it relies on the assessment undertaken by the OEMs with regards to the extent of this risk.

5. Remediation Measures

The Companies have not identified any instances of forced labour or child labour in their supply chain, and so no remediation measures have been taken.

6. Remediation of Loss of Income

The Companies have not identified any instances where the measures they have implemented to eliminate forced labour or child labour from their supply chain have led to the loss of income, and so no remediation measures have been taken to address this issue.

7. Training

The Companies do not currently provide training in connection with human rights including forced labour and child labour.

8. Assessing Effectiveness

The Companies have not taken any action to assess their effectiveness in addressing risks of forced labour and child labour in their activities and supply chains.

9. Approval and Attestation

This report has been approved by the Directors of Stuart Budd & Sons Ltd., Budds' Hamilton Limited, Budds' Oakville Limited, and Budds 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 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: Stuart Christopher Budd

Title: Director

Date: May 28, 2024

Signature: S Chris Budd

I have the authority to bind Stuart Budd & Sons Ltd., Budds' Hamilton Limited, Budds' Oakville Limited, and Budds Motors Inc.

Signature: 
[Chris Budd \(May 28, 2024 14:39 EDT\)](#)

Email: cbudd@buddschev.com

Budds' Group of Companies - Modern Slavery Act Report 2023

Final Audit Report

2024-05-28

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