

May 2024



SULLIVAN MOTOR PRODUCTS LTD.

**JS Investments Ltd.
Charmar Holdings Ltd.**

Modern Slavery Report 2023

Supply Chain Report

January 1 – December 31, 2023

1. Introduction

This report is made on behalf of Sullivan Motor Products Ltd. / JS Investments Ltd. / Charmar Holdings Ltd. (“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.

2. Structure, Activities and Supply Chains

The Company is incorporated in the Province of British Columbia. and is located in the town of Houston.

The Company specializes in the retail sale of new and used motor vehicles and RV’s, auto parts and RV parts, as well as comprehensive RV and vehicle servicing and repairs. We employ between 40-55 people, depending on the time of year.

As a dealer of new and used vehicles and RVs and their parts, our supply chain is primarily based on the supply chain of automotive and RV manufacturers. As an authorized GMC, Chevrolet & Buick dealer, the majority of the Company’s procurement spend is with GM. For RV’s, we are an authorized dealer of a variety of brands, including Keystone, Forest River, Thor and Winnebago.

We also purchase goods and services from other third party suppliers. We purchase auto parts from a variety of suppliers such as UAP/NAPA, Lordco and Grandwest Enterprises. We purchase RV parts from a variety of suppliers such as East Penn, Keystone and Forest River. We purchase office supplies from a number of suppliers including Countrywide Printing and Staples. We purchase a variety of other supplies from suppliers including Castle Building Center, D&M Industrial Supplies and Home Hardware. We try to purchase local as much as possible for these items because we know the people we deal with, and trust that they are not promoting slavery or child labor. If we were to stumble upon some information that said otherwise, or if we found out that one of our suppliers was not purchasing ethically sourced materials, we would investigate and change suppliers if needed.

3. Policies and Due Diligence Processes

Sullivan Motor Products Ltd. is against forced labour, slavery, and child labor. We do not, nor will we ever condone or support any supplier who engages in these activities.

We have taken the time to read through and ask questions about our suppliers’ supply chains and have read through as many of their policies as possible, in order to do our due diligence.

Obviously, we cannot identify every single step of their supply chains, so there is a level of trust in our suppliers that they are doing everything that they say in their policies.

If you are interested and would like to learn more, here are some links to some of our suppliers' policies:

GM:

https://www.gm.com/content/dam/company/archive/docs/legal/General_Motors_Company_Anti_Slavery_And_Human_Trafficking_Statement.pdf

and

<https://www.gm.ca/en/home/supply-chain-responsibility.html>

Thor Industries:

https://www.thorindustries.com/cms/media/92a08fa5-284b-457e-8e93-4f7078ac0efc_Human+Rights+Policy+12+15+2022.pdf

Winnebago Industries:

<https://winnebago.gcs-web.com/static-files/9a2b719c-6ace-46d1-9f84-23c8a8bdc099>

4. Assessment of Forced Labour and Child Labour Risks

Other than previously mentioned, 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 GM and our RV suppliers, it relies on the assessment undertaken by GM and our RV suppliers with regard to the extent of this risk. Please see above for links to our main suppliers' policies.

5. 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.

6. 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.

7. Training

The Company provides an Employee Handbook that all new employees are required to read in full and agree to upon employment. This handbook currently includes a section about Ethical Business Practices. Here is some of the wordage: 'Nevertheless, we conduct business in an ethical manner wherever we operate and do not tolerate bribery, corruption or any other unethical practices even where they are condoned or accepted, either tacitly or explicitly, by the

law of the land or by the authorities in question.’ This section of our handbook is planned to be updated to include specific words regarding forced labour and child labour.

8. Assessing Effectiveness

The Company has not taken any action to assess its effectiveness in addressing the risks of forced labour and child labour in its activities and supply chains. However, all employees are encouraged to be aware of any signs of any unethical behavior from any person or company we have business dealings with, and to report them to management promptly if there are any suspicions.

9. Approval and Attestation

This report has been approved by the Management Team of Sullivan Motor Products Ltd. / JS Investments Ltd. / Charmar Holdings Ltd. 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 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: John Sullivan

Title: Dealer Principal

Date: May 29, 2024

Signature:  _____

‘I have the authority to bind Sullivan Motor Products Ltd. / JS Investments Ltd.’

Full name: Murray Sullivan

Title: General Manager

Date: May 29, 2024

Signature:  _____

‘I have the authority to bind Sullivan Motor Products Ltd. / Charmar Holdings Ltd.’