

May 2024



Vickar Community Chevrolet Ltd.

**Modern Slavery Report
2023**

1. Introduction

This report is made on behalf of Vickar Community Chevrolet 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 a corporation based in Winnipeg, Manitoba with approximately 130 employees.

The Company specializes in the retail sale of motor vehicles and parts as well as comprehensive vehicle servicing and repairs.

As a dealer of new and used vehicles and their parts, our supply chain is primarily based on the supply chain of automotive manufacturers. Specifically, as an authorized General Motors Canada (“GM Canada”) dealer, the majority of the Company’s procurement spend is with GM Canada.

GM Canada is a company continued under the laws of Nova Scotia with its headquarters in Oshawa, Ontario. GM Canada is an indirect wholly owned subsidiary of General Motors Company, a company headquartered in Detroit, Michigan.

GM Canada designs, manufactures, markets and distributes vehicles and vehicle parts. GM Canada also distributes GM-manufactured vehicles across Canada through a network of approximately 450 independently owned and operated authorized dealers. GM Canada also imports vehicles for sale in Canada through its authorized dealer network, as well as vehicle parts for its vehicle production operations in Canada.

In 2023, GM Canada operated a vehicle assembly and parts stamping facility in Oshawa, Ontario; an engine and transmission production facility in St. Catharines, Ontario; an electric vehicle assembly facility in Ingersoll, Ontario (CAMI); and four parts distribution centres (one each in Quebec, Ontario, Alberta and British Columbia).

GM Canada is also home to the Canadian Technical Centre (CTC), which develops key technologies and products. The CTC has four engineering locations across Ontario, including automotive software development and testing-focused engineering at Elevation Centres in Oshawa and Markham, and test tracks in Oshawa and Kapuskasing.

As of December 31, 2023, GM employed approximately 151,000 employees worldwide. GM Canada had approximately 7,800 employees. Their roles included:

- Senior, middle and other management staff
- Semi-skilled and skilled trades workers
- Professionals/semi-professionals and technicians

Sourcing of parts for GM Canada's production and warehousing facilities is primarily centralized in GM's Global Purchasing and Supply Chain function, but GM Canada enters into contracts directly to purchase the parts. GM Canada also sources certain other goods and services directly from suppliers.

GM vehicles are manufactured in various locations across the globe. In 2023, GM sourced from approximately 5,700 global suppliers. This included a wide variety of raw materials, parts and tires, supplies, transportation and other goods and services.

With the exception of vehicles and parts, the majority of GM Canada's direct suppliers are based in Canada. Many of these suppliers provide goods that originate from other jurisdictions.

3. Policies and Due Diligence Processes

Many of the advanced technologies in GM's portfolio may use minerals and materials that are potentially mined in Conflict-Affected and High-Risk Areas (CAHRAs). To identify and mitigate human rights risk in sourcing of these raw materials, due diligence is undertaken in connection with GM's Responsible Materials Program and GM's Conflict Mineral Program aligned with the [OECD](#) Due Diligence Guidance for Responsible Supply Chains from CAHRAs.

GM's activities related to mitigation include:

- Using the Conflict Minerals Reporting Template (CMRT) to survey Tier I suppliers with products containing 3TG that were shipped to GM. In 2023, GM surveyed suppliers to gain visibility in the smelters or refiners (SORs) in our supply chain. GM also surveyed 2,454 3TG supplier locations for GM's Conflict Minerals Program in 2023 and received responses from 97% of those supplier locations.
- GM is active in the Responsible Minerals Initiative (RMI) that validates that SORs pass the Responsible Minerals Assurance Process (RMAP) through a risk-based approach of processes for responsible mineral procurement. In 2023, GM sent communications to 42 3TG and 14 cobalt smelters, refiners, or processors.
- Participating within the RMI and its working subgroups, including the Smelter Engagement Team, a subgroup that enables GM to have direct SOR engagement. GM also has participated in RMI-sponsored SOR RMAP pre-audit visits.
- Joining the Initiative for Responsible Mining Assurance (IRMA), a third-party certification of industrial mine sites, and RCS Global Better Mining Initiative for small and artisanal mines.
- Founding Member of the Global Platform for Sustainable Natural Rubber (GPSNR), an international, multistakeholder organization with a mission to lead improvements in the socioeconomic and environmental performance of the natural rubber value chain. GM actively participates in two GPSNR working groups alongside civil society organizations, tire makers, natural rubber processors, and smallholder farmers.

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 GM Canada, it relies on the assessment undertaken by GM Canada with regards to the extent of this risk.

In 2021, GM conducted a human rights saliency assessment to identify the potential adverse impacts to people that could be caused by our company's activities and business relationships. The assessment included desktop research, reviewing industry analyses, connecting with external stakeholders and hosting a series of internal workshops with leaders from across the enterprise and our geographic footprint. During these workshops, we identified potential risks and impacts throughout our value chain, considered the severity and likelihood of each impact, and prioritized them for further review and action.

Please see GM Canada's 2023 Modern Slavery Report here:
<https://www.gm.ca/en/home/supply-chain-responsibility.html>

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

Training is a critical aspect of reinforcing our ethical culture because it educates our employees on how to apply the standards and principles set forth in our policies in their work activities. At the start of employment all employees are required to review our Employee Handbook. Every year, employees are required to review sections of the Employee Handbook to stay current on our policies and Code of Conduct. Once employees complete their annual review, they are required to certify that they agree to comply with the policies contained in the Code.

In 2023, Vickar Community Chevrolet achieved an 80% completion rate among employees and Management.

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

This report has been approved by the Board of Directors of Vickar Community Chevrolet Ltd. in accordance with section 11(4)(a)

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: Larry Vickar

Title: Director and President

Date: May 30, 2024

A handwritten signature in black ink, appearing to read "Larry Vickar", is written over a horizontal line.

I have the authority to bind Vickar Community Chevrolet Ltd.