



WG WINSLOW GEROLAMY MOTORS LIMITED

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FRANCHISE DEALER

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The Minister of Public Safety and Emergency Preparedness
80 Wellington Street
Ottawa, ON K1A 0A3

May 23, 2024

Re: Attestation as Required under the Fighting Against Forced Labour and Child Labour Supply Chains Act, S.C. 2023, c.9

Winslow-Gerolamy Motors Limited (the "Entity") is required to submit a report ("Report") pursuant to subsection 11(1) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c.9 ("Act").

The Report is attached hereto.

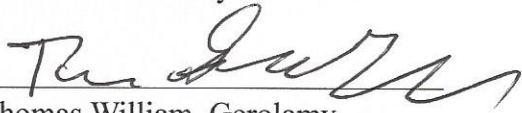
In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the Report for the Entity. Based upon our knowledge, and having excised reasonable due diligence, we attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting period of the Entity ended October 31, 2023.

Winslow-Gerolamy Motors Limited

Michael Allen Winslow

(I have the authority to bind the Corporation)


Winslow-Gerolamy Motors Limited



Thomas William Gerolamy

(I have the authority to bind the Corporation)

Winslow-Gerolamy Motors Limited



Steven David Gerolamy

(I have the authority to bind the Corporation)

2023 Modern Slavery Report
Prepared and Submitted By Winslow-Gerolamy Motors Limited

This 2023 Modern Slavery Report is submitted to the Minister of Public Safety and Emergency Preparedness pursuant to subsection 11(1) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c.9 (referred to herein as the “Act”)

The Act requires certain persons identified as an “Entity” to submit an annual report outlining steps the Entity has taken to prevent and reduce the risk that forced labour or child labour is use;

- a) in any step of the production, selling or distribution of goods in Canada, or elsewhere by the entity.
- b) in the course of importing into Canada goods produced outside of Canada; or
- c) by another entity controlled by the Entity.

Winslow Gerolamy Motors Limited (the “Company”) is an Entity as the term is defined in subsection 2 of the Act. Specifically, the Company meets the revenue and net asset thresholds as identified therein. The Company’s business number is 105714299. This report is filed in respect of the Company only (i.e., it is not a joint report) for its fiscal year ended October 31, 2023 and is not an amended report. The Company is not subject to reporting requirements under one or more supply chain legislation in any county or jurisdiction other than Canada.

The Company, along with its shareholders and staff, stand against the use of forced labour and child labour in any and all circumstances.

Structure, activities and supply chains

The Company is a privately held Canadian corporation and resident in Canada. It carries on an International® Truck franchise operation through a single location in Peterborough, Ontario. In addition to new and used truck sales, the company offers parts, service and medium to long term truck leasing. The company is agnostic with respect to industry sector (it sells to several sectors) but it would considered to be a business to business retailer. During the reporting period, the Company employed approximately 60 individuals, all of whom were based in the Peterborough business location.

The Company has no other place of business, does not carry on business outside of Canada and all of its assets are located in Canada.

Approximately 70 % of the Company's purchases are made from Navistar Canada Inc. ("Navistar") which is indirectly owned by Volkswagen Group, a publicly traded corporation. In all but a few new truck purchases a year, Navistar is the importer of record.

In total, the Company acquired products and services from approximately 240 different persons during the reporting period.

Policies and due diligence processes in relation to forced labour and child labour

As of April 22, 2024 the company has a formal policy forbidding the use of forced labour and child labour. The Policy is published and predominantly displayed on the Company's website.

As of April 30, 2024, the company has formally notified all of its employees regarding the prohibition against forced labour or child labour. Further, each employee of the Company has been instructed to notify their direct supervisor in respect of any circumstance which that believes, or even suspects, that forced labour or child labour might be in use in the Company or any of the Company's supply chains.

Parts of business and supply chains that carry risk of forced labour or child labour being used and the steps taken to assess and manage that risk

In order to assess the risk of forced labour or child labour being used in the Company's supply chain, the Company issued a formal letter to substantially all of its service and product advisors (herein after referred to as "Provider" or "Providers"). The letter asked the Provider to confirm whether or not that Provider uses forced labour or child labour in its respective supply chain. And where a "Yes" response was indicated, the letter asked such Provider to indicate steps being taken to eliminate the use of such labour.

As of May 1, 2024, Winslow Gerolamy Motors Limited have also posted the Act on their official Web site, and has made the Act information available to all of it's employees

As of the date of this report the Company has received a response from 5 % of the total inquires sent. None of the responses received indicated the use of forced labour or child labour.

While there can never be a guarantee, the Company concludes that the risk of forced labour or child labour in its supply chain is very low.

Measures Taken to Remediate and forced labour or child labour

As the Company is not aware of any forced labour or child labour circumstances, no apparent remedial action has been necessary. To the extent any such circumstance does arise, the Company will, forthwith, take appropriate action.

Measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in activities and supply chain.

As the Company is not aware of any forced labour or child labour circumstance, no apparent remedial action has been necessary. To the extent any such circumstance does arise, the Company will, forthwith, take appropriate action.

In addition, the Company understands that forced labour and child labour is illegal in Canada and the Company endeavours to having business dealings only with persons who not have reputational issues or perceptions.

How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

The Company will formally ask the majority Provided every couple of years to attest to their non-use of forced labour or child labour.

Attachment: See a copy of the letter that was provided to our customers to show their compliance with the Act, requiring them to acknowledge by signing and returning a self addressed and stamped envelope.

Winslow-Gerolamy Motors Limited
1018 Lansdowne St. W.
Peterborough, Ontario K9J 1Z9
705-742-3411

Bill S-211
Forced labour & Child Labour Compliant

Please be aware that the Government of Canada is mandating that all companies in Canada conform to Bill S-211, which pertains to use of forced labour and child labour. A description of the terms of the bill are noted below:-

Forced Labour includes labour and/or service provided, offered or to be provided by a person under circumstances that:

- a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer the labour or services; or
- b) any work or service extracted from any person under the menace of any penalty and for which the said person has not offered voluntarily.

Child Labour includes service or labour provided or offered to be provided by persons under 18 years of age that:

- a) are provided under circumstances that are mentally, physically, socially, or morally dangerous to them.
- b) interferes with their schooling in any way.
- c) constitutes any form of slavery or practices similar to slavery, such as the sale and trafficking of children, use of children for prostitution, pornography, illicit acts, debt bondage and serfdom, and forced or compulsory labour, including forced or compulsory recruitment of children and for use in armed conflict.

Please be advised that the operations of Winslow-Gerolamy Motors Limited is compliant with Bill S-211 and has made all necessary steps to insure that all of our suppliers of parts and services have committed to the same business practices.

Your signature below will confirm that to the best of your knowledge your company is compliant with Bill S-211.

We have enclosed a self-addressed envelope with prepaid postage for you to return to us as soon possible. We thank you for our co-operation in and attention to this matter.

Company Name: _____

Name and Position: _____

Signature and Position: _____ Dated: _____