

Midtown Motors' Supply Chains Act Report (2024)

ABOUT THIS REPORT

1060038 Ontario Ltd., operating as Midtown Motors, has prepared this report (the "**Report**") pursuant to the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") for the financial year ended December 31, 2024. All references in this Report to "we", "us", "our" or "**Midtown Motors**" refers to 1060038 Ontario Ltd. unless otherwise indicated.

This Report describes our approach to identifying and understanding the risks of forced labour or child labour ("**Modern Slavery**") in our operations and supply chains, and the steps we have taken to prevent and mitigate these risks. This has been done in accordance with the mandatory reporting criteria outlined in Sections 11(1) and 11(3) of the Act.

Midtown Motors does not report under similar legislation in any other jurisdiction.

INTRODUCTION

As a family-owned business, we understand the importance of a positive presence in our community. We strive to always act ethically and with integrity in our business.

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Midtown Motors is registered under the Ontario *Business Corporations Act* and is located in Ingersoll, Ontario. Established in 1938, we are a third-generation family-owned business. Our core business today is sourcing and providing high quality previously owned vehicles from Canada and the United States to dealers on both sides of the border through multiple channels, including physical auction, online auction and direct sales. Our Ingersoll, Ontario location also performs vehicle servicing, collision repairs, general restorations and detailing services.

We currently have 6 employees in our operations, all located in Ingersoll, Ontario. Our supply chains consist of:

- the exportation of previously owned vehicles from Canada to the United States;
- the importation of previously owned vehicles from the United States into Canada; and
- local contracts for services (e.g., employees, transportation of vehicles to and from our location in Ingersoll, Ontario).

In 2024, our largest category of supply chain expenditures was the purchase of previously owned vehicles. Other expenditures included vehicle-related consumables (e.g., engine oil, fuel, parts, paint and lubricants) and transportation of vehicles.

POLICIES AND DUE DILIGENCE

As a family-owned and operated dealership in our community, we take immense pride in our commitment to transparency, integrity, and ethical business practices. Our legacy spans generations, and we have always strived to uphold the highest standards in all aspects of our operations.

However, we recognize that in today's interconnected world, issues such as Modern Slavery and human rights violations are critical concerns. While we firmly believe that our dealership operates with the utmost care and respect for our employees, suppliers, and customers, we acknowledge that the landscape is evolving.

As a small business, we allocate our resources judiciously. While we prioritize compliance with all applicable legal requirements, including those related to labour, employment and human rights, we have not yet implemented separate policies specifically addressing the risks of Modern Slavery. Our assessment of our overall risk has led us to focus primarily on day-to-day operations and customer service.

POTENTIAL RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

We believe that Midtown Motors is generally at low risk of engaging in or contributing to Modern Slavery. Unlike large corporations with sprawling global supply chains, Midtown Motors operates on a smaller scale in Canada and the United States only. According to the Walk Free Foundation's 2023 Global Slavery Index, Canada and the United States are low risk geographical regions due to their robust human rights statutory protections and regulatory oversight. Also, our long history and smaller scale of operations allow us to maintain direct communication and close and strong long-term relationships with our employees, customers, service providers, the community and, in some instances, our suppliers. We believe that this history and proximity to other stakeholders and the robust protections and regulatory oversight in Canada and the United States inherently reduce the risk of Modern Slavery in our business and supply chains.

To date, we are not aware of any instances of Modern Slavery in our operations or supply chains, and as such, no remediation activities have been undertaken by Midtown Motors, including those related to remediating the economic impact that flow from remediation efforts.

TRAINING

Due to the low-risk nature of Midtown Motors, we do not currently provide training to our employees on Modern Slavery.

ASSESSING EFFECTIVENESS

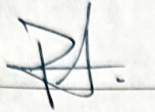
We intend to continue to consider and reevaluate the need to implement measures directed at Modern Slavery, including those directed at assessing the effectiveness of those measures.

APPROVAL & ATTESTATION

This Report was approved pursuant to Section 11(4)(a) of the Act by the Board of Directors of 1060038 Ontario Ltd.

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.

S. Paul Antony



I have the authority to bind **1060038 Ontario Ltd.**

Full Name: Paul Antony

Title: President

Date: May 2, 2024