

# OTTO'S SUBARU

LIVE LIFE UNCOMMON

The Honorable David McGuinty  
Minister of Public Safety and Emergency Preparedness  
Parliament of Canada  
Ottawa, ON

May 31, 2025

Dear Minister McGuinty,

Please accept the following report to meet Otto's Subaru (Westboro Auto Imports Ltd.) compliance under Canada's *Forced Labour and Child Labour in Supply chains Act* ("S0211"). As the company's Dealer Principal and owner, I have the legal authority to bind Otto's Subaru for the purpose of this report.

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 Otto's Subaru. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year January 1, 2024 to December 31, 2024.

Otto's Subaru is committed to developing and implementing policies and procedures to reduce the risk of forced labour in our supply chains. Since the *Supply Chains Act* came into effect on January 1, 2024, we have taken steps to exercise our due diligence. Upholding human rights and creating a safe, healthy, fair workplace for all is my top priority.

Please do not hesitate to reach out to me should you require any further information.

Sincerely,



Sonia Koller

Dealer Principal & Owner  
Otto's Subaru

## Forced Labour in Canadian Supply Chains 2024 Report

**Submitted to:** Ministry of Public Safety and Emergency Preparedness  
**Reporting period:** January 1, 2024 to December 31, 2024

**Date:** May 31, 2025

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### Steps taken to prevent and reduce the risk of forced labour or child labour

The following is a summary of the initiatives we began in 2024.

- 1. Preparation of policy:** Otto's Subaru prepared a draft version of a Forced Labour and Child Labour in Supply Chains policy to become compliant with the new legislation. This draft policy is currently under review.
- 2. Awareness:** Once the policy is approved, it will be distributed to all employees for their review and acknowledgement.
- 3. Risk identification:** At Otto's Subaru, we have started the process of identifying risks.
- 4. Source verification:** We make an effort to source promotional products from Certified B Corporations, that prioritize ethical and socially responsible businesses as applicable.
- 5. Training:** We have launched a forced labour training module and applicable staff have completed the training.

### Company's structure, activities and supply chains

Otto's Subaru (Westboro Auto Imports Ltd.) is a corporation that sells new and used motor vehicles and offers parts and accessories as well as repair and maintenance service to Subaru customers. The main source of supply of vehicles, spare parts and accessories is Subaru Canada Inc.

### Policies and due diligence processes

We are committed to developing responsible business conduct into our policies and management systems in 2025. Our Forced Labour and Child Labour in Supply Chains policy is currently in progress.

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

As a Subaru retailer, we purchase the majority of our parts and service materials directly from Subaru Canada.

We believe that the greatest risk of forced and child labour exists with the promotional and event products we purchase from offshore manufacturers and suppliers. Further research and training are required to better identify potential risk areas.

**Measures taken to remediate any forced labour or child labour**

Not applicable for the period of this report.

**Measures taken to remediate the loss of income to vulnerable families affected by measures taken to eliminate the use of forced labour or child labour**

Not applicable for the period of this report.

**Training provided to employees**

Our online training platform, DealerPilot HR, released a new course on Forced Labour and Child Labour in Supply Chains in May 2024. We have launched the training module and have started assigning the mandatory course to employees as applicable.

**Assessment of company's effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains**

Otto's Subaru will conduct an annual internal analysis of effectiveness of our policies and procedures to ensure that forced labour and child labour is not being used at the company. Otto's Subaru will also follow any review, audit or assessment that is done by the manufacturer and related vendors and suppliers.