

Structure, activities and supply chains

Highbury Ford Sales Limited ("Highbury") is a registered Ford Dealership operating out of London Ontario since 1975. Highbury sells New, Used and Commercial vehicles, has both a service shop and body shop, direct sells vehicle parts, and also leases vehicle directly to select customers.

New vehicles are purchased directly from Ford Motor Company ("Ford").

Used vehicles are obtained via trades on new deals, are purchased through (Canadian) vehicle auctions, or are purchased directly from companies or individuals within Canada.

Parts are primarily purchased through Ford. Other Canadian and US vendors also exist.

Policies and Due Diligence Processes

Highbury has prepared a *Forced Labour and Child Labour in Supply Chains* policy.

Parts of the business and supply chain that carry a risk

Risk

New Vehicle sales – risk that Ford vehicles may have been assembled using forced/child labour, or may contain components that utilized forced/child labour.

Assessment

Each year Ford publishes a Global Modern Slavery and Human Trafficking Transparency Statement. Review of the statement indicates a thorough assessment was completed by Ford and that ethical practices appear to be in place. Risk assessed as low.

Risk

Parts sales – risk that the Parts supply chain involved forced/child labour.

Assessment

The vast majority of parts are purchased directly through Ford (estimated at 80%). As such, the risk associated with these part purchases is assessed as low.

Non-OEM part purchases are made from multiple suppliers or in some cases other dealers. An analysis of 2024 parts purchases has revealed that only two vendors made up more than 2% of total part purchases. The annual filing has been obtained for each of these vendors, and review of the filing reveals that ethical practices appear to be in place. The risk associated with non-OEM part purchases is assessed as low.

Measures taken to remediate any forced labour or child labour

- Create and distribute company policy

- Perform analysis and risk assessment of supply chain
- Obtain and review publications from material vendors regarding their supply chain management and assessment

The training provided to employees on forced labour and child labour

Highbury has prepared and distributed their *Forced Labour and Child Labour in Supply Chains* policy. This has been informally discussed with managers and employees. It has been communicated that employees are expected to assist in the fulfillment of responsibilities under the policy, and that both employer and employees have obligations in maintaining a safe, compliant and fair workplace.

In May 2025 Highbury has assigned a Forced Labour and Child Labour in the Supply Chains training course to all employees. Over the upcoming months they will work to ensure staff have completed the training.

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

- Internal assessment of processes on an ongoing basis, documented annually
 - o Ongoing assessment of supply chains to ensure all risks, including new ones, have been identified and assessed
 - o Ongoing discussion with employees to ensure they are aware of the company policy and understand their responsibility with respect to it
 - o Regular review of material suppliers to understand what measures they have taken to ensure the integrity of their supply chains



Highbury Ford Sales Limited
Bill S-211 2024 Attestation
Year Ended December 31, 2024

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 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.

I, Robert Vitali, state that I have the authority to bind Highbury Ford Sales Limited

Robert Vitali
President
May 15, 2025

Highbury Ford Sales Limited

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