

Enterprise Fleet Management Canada, Inc.

Canada Modern Slavery Disclosure Statement 2024

Financial Year 2023

Introduction

Pursuant to the *Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act*, Enterprise Fleet Management Canada, Inc. (hereafter referred to as “EFM Canada”) has prepared this statement to detail actions taken to understand potential forced labour, child labour, and human trafficking risks related to its business and supplier network, and to document the steps taken to mitigate any such risk. This statement relates to activities during EFM Canada’s financial year of August 1, 2022 – July 31, 2023.

Company Structure

EFM Canada is a subsidiary of Enterprise Fleet Management, Inc. Enterprise Fleet Management, Inc. serves companies, government agencies and organizations with medium-sized fleets of 20 or more vehicles, as well as anyone looking for an alternative to their employee vehicle reimbursement program. Principal elements of EFM Canada’s supplier network are original-equipment vehicles.

Company Policy

EFM Canada is committed to maintaining and working to enhance processes and systems to ensure to the extent practicable that forced labour, child labour, and human trafficking are not taking place in its business or supplier network. In furtherance of that commitment, EFM Canada employs the below described approach to assessing and mitigating these risks.

Forced Labour, Child Labour and Human Trafficking Risk Areas

We assess the risk to the EFM Canada business to be minimal. Within EFM Canada’s supplier network, we believe there is potential risk in the following areas: extraction of metal used in vehicles purchased from original-equipment manufacturers and extraction of rubber in tires used in its leasing fleets.

Due Diligence and Risk Mitigation Programme

EFM Canada utilises a variety of means to execute on its anti-forced labour, child labour, and human trafficking efforts. EFM Canada has adopted and supports all of the following means within its own business.

Awareness

EFM Canada’s efforts begin with awareness of its anti-forced labour, anti-child labour, and human trafficking stance – awareness among employees, customers, business partners, and suppliers:

- **Employee Code of Conduct** – EFM Canada has adopted an [Employee Code of Conduct](#)

which contains explicit language regarding its anti-forced labour, anti-child labour, and child labour position. The Code is issued to and acknowledged every year by employees and accompanied by an interactive training module. The Code is posted on applicable websites, allowing access to the general public, our customers, and business partners.

- **Employee Recruitment Policies** – EFM Canada conducts pre-employment screenings which include Proof of Right to Work review. Additionally, there are policies and procedures in place to ensure adherence to local and national laws and prohibit discrimination, harassment, intimidation, and the confiscation of workers identification documents. EFM Canada has a pro-employee philosophy and allows for the freedom of workers to terminate employment, change positions, and seek association.
- **Supplier Code of Conduct** – EFM Canada has adopted a [Supplier Code of Conduct](#) which contains anti-forced labour, anti-child labour, and human trafficking language mirroring that found in the Employee Code of Conduct. In this way, each of EFM Canada's suppliers is affirmatively advised of EFM Canada's position and expectation that its suppliers comply with such principles. New suppliers are provided the Supplier Code of Conduct during the on-boarding process.

Risk Assessment and Investigation

EFM Canada has assessed potential forced labour, child labour, and human trafficking supplier risk in the following areas: extraction of metal used in vehicles purchased from original-equipment manufacturers and extraction of rubber used in vehicle tires.

EFM Canada has assessed the *actual* risk in the above-referenced areas through a previous supplier policy and practices review which included, in most cases, a review of published human rights and working condition statements and contract terms. EFM Canada has determined the applicable suppliers adequately mitigated these risks through strong anti-forced labour, anti-child labour, and human trafficking positions, as well as detailed assessment, avoidance, and mitigation plans, addressing the sourcing of raw materials and assembly of products. In an effort to strengthen the way EFM Canada identifies, assesses, and addresses modern slavery in its supply chain, we engaged in an exercise to evaluate and select a third-party software solution to help manage risks. A solution was selected and efforts are underway to purchase and implement the tool to enhance the risk assessment process over the next year.

Assurance

- **Contracts and Agreements** – EFM Canada has developed standard contract language regarding the prohibition of forced labour, child labour, and human trafficking and is including it in its contracts with suppliers of goods and services based on risk.
- **Reporting Mechanism** – EFM Canada utilises a third party-administered hotline to allow for anonymous reporting of ethics and compliance concerns. The hotline web portal allows reporting not only from employees, but from customers, suppliers, and business partners as well. To afford greater visibility to the forced labour, child labour, and human trafficking issue, a standalone “Forced Labour and Human Trafficking” category is included in the list of matters for which reports can be submitted. The availability of the hotline is made known to EFM Canada's suppliers by way of reference in the Supplier Code of Conduct. No incidents related to modern slavery concerns were raised through this reporting mechanism or other internal channels.

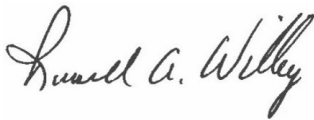
Training

As noted above, EFM Canada issues annual Code of Conduct training to employees. This comprehensive course presents and tests knowledge of the company's anti-forced labour, anti-child labour, and human trafficking policy and practices.

Conclusion

EFM Canada fully supports the principles underlying the *Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act* and is committed to the operation of a business—both directly and through our supplier network—free from the presence of forced labour, child labour, and human trafficking. To date we have found no direct evidence of forced labour, child labour, or human trafficking activity or risk in our business or supplier network. Going forward, we will continue to drive awareness of our anti-forced labour, anti-child labour, and human trafficking position with employees, suppliers, business partners, and customers; examine our business and supplier network for risk; and aggressively respond to and address risk or evidence of forced labour, child labour, or human trafficking.

Adopted on behalf of Enterprise Fleet Management Canada, Inc. on 05/31/2024.



Russell A. Willey
Director