## Canadian Statement Against Forced Labour and Child Labour in Supply Chains

pursuant to an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff, referred to as Canada's "Modern Slavery Act" (the "Act") for the year ending December 31, 2023

### 1. INTRODUCTION

This is a statement made by Boyd Group Services Inc. in respect of the Act, as referenced above, on behalf of the reporting entities listed in section 2 below.

#### 2. REPORTING ENTITY

This statement is being filed with respect to the activities of the Boyd Group Services Inc., and its subsidiaries Assured Automotive (2017) Inc., and The Boyd Group Inc. (collectively, the "Boyd Group" or the "Companies).

Boyd Group Services Inc. is a corporation incorporated pursuant to the laws of Canada. Boyd Group Services Inc. is publicly traded on the Toronto Stock Exchange (TSX: BYD.TO).

Assured Automotive (2017) Inc. and The Boyd Group Inc. are corporations incorporated pursuant to the laws of Canada, and are each wholly-owned subsidiaries of Boyd Group Services Inc. This report is being filed as a joint report for the Boyd Group, in accordance with section 11(2) of the Act.

### 3. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

The Boyd Group is one of the largest operators of non-franchised collision repair centers in North America in terms of number of locations and sales. The Boyd Group currently operates locations in Canada under the trade name Boyd Autobody & Glass and Assured Automotive. Image 1 provides a geographic breakdown of the Boyd Group's Canadian locations by trade name and location as at December 31, 2023.

The Boyd Group provides collision repair services to insurance companies and individual vehicle owners, with a high percentage of the Companies' revenue being derived from insurance-paid collision repair services. For more information on the Boyd Group, refer to its securities filings at www.sedarplus.com.

In connection with providing collision repair services to various customers, the Boyd Group procures and resells vehicle parts and related products necessary to conduct its primary business.

BOYD =	46 locations
British Columbia	16
Alberta	14
Manitoba	12
Saskatchewan	4
Assured	87 locations
Ontario	87
The above numbers include 38 in	stake locations.

The Boyd Group has a large and diverse network of suppliers, vendors, customers and other business partners, and recognizes the role that they play in helping fulfill the Companies' mandate. The Boyd Group procures material from established suppliers in both Western and Eastern Canada in connection with its Canadian business. As the Boyd Group's primary business in Canada is as a service provider (i.e., to provide collision repair services), procurement is generally limited to materials necessary to provide such services (i.e., parts, paint, tools, etc.). In providing services, the Companies are generally restricted in the types of parts that may be used (i.e., by insurance requirements, manufacturer specifications, etc.). For this reason, where parts are procured, they are procured primarily from the Original Equipment Manufacturer ("**OEM**") or large, trusted suppliers. The Boyd Group expects such suppliers to manage the risk of forced labour or child labour in their own supply chains.

## 4. POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

The Boyd Group is committed to respecting human rights principles aimed at promoting and protecting human rights in the countries in which we operate. Our success is reliant on our relationship with our employees, customers, clients and investors. Conducting our business with strong ethics and integrity is a critical part of earning and maintaining their trust. We do not tolerate any behaviour that deviates from our ethical standards.

Consistent with the principles set forth in the Boyd Group's internal policies, the Companies strive to eliminate forced labour, child labour, and discrimination in the workplace.

As part of the Companies' commitment to respect human rights, we have undertaken to establish internal and external mechanisms to help identify, address, and mitigate potential adverse human rights impacts. Various of these mechanisms are described below.

#### Our Approach

Our values guide our business and help ensure that our operations and supply chain are aligned with our ethical standards. Our <u>Code of Business Conduct and Ethics</u> provides the standards for ethical behaviour for our employees throughout our business activities and reflects our commitment to maintaining a culture of honesty, integrity and accountability. Pursuant to the Code of Business Conduct and Ethics, all company representatives must be aware of and comply with all applicable laws, whether domestic or foreign, which govern the areas of business within their responsibilities and their own conduct as company representatives. This includes laws governing forced labour and child labour.

The Code of Business Conduct and Ethics is supported by our <u>Anti-Corruption Policy and Procedures</u>, our <u>Non-Discrimination and Anti-Harassment Policy</u>, and our <u>Human Rights Statement</u>. These policies are available on our website at <a href="https://www.boydgroup.com/sustainablity">https://www.boydgroup.com/sustainablity</a>.

The Boyd Group is actively working to build on existing policies and procedures to develop and implement various policies and processes specific to forced labour and child labour matters, and to more deeply entrench responsible business conduct into our various policies and management systems.

## **Suppliers – Business Partner Code of Conduct**

Our business partners and suppliers are critical collaborators in delivering our products and services and we strive to work with partners who are aligned with our values and commitments. In 2022, we achieved our goal to develop and publish a <u>Business Partner Code of Conduct</u> in order to ensure that our suppliers understand our company standards and values

As part of the onboarding process, all new suppliers are asked to acknowledge and adhere to the Business Partner Code of Conduct. The Business Partner Code of Conduct requests suppliers to, among other things:

- Maintain awareness of and comply with all applicable laws and regulations of the countries in which they operate;
- Strive to eliminate forced labour, child labour, and discrimination in the workplace;
- Strive to play a positive role in advancing responsible and sustainable development, and improving standards of living; and
- Commensurate with the size and nature of the supplier's operations, support compliance with the Business Partner Code of Conduct by establishing appropriate management processes.

The Boyd Group reserves the right to terminate any agreement with any supplier that cannot demonstrate compliance with the Business Partner Code of Conduct.

Pursuant to the Human Rights Statement, the Boyd Group expects business partners, including suppliers, to share their respect for human rights. While the Boyd Group expects its business partners to undertake their own efforts to address any human rights issues in their own business or supply chains, we support the efforts of the suppliers in respect of such matters. Failure to address such issues would result in a violation of the terms and conditions described below, and would be grounds for the Boyd Group to terminate their relationship with said supplier.

#### **Contractual Measures**

All new suppliers are expected to adhere to the Boyd Group's standard purchase order terms and conditions. These terms and conditions are contractually binding, and require all new suppliers to warrant that all goods furnished pursuant to the purchase order comply with all applicable laws, rules and regulations. This includes compliance with forced labour and child labour laws.

### **Reporting and Anti-Retaliation Policy**

The Boyd Group encourages a "speak up" culture. Choosing to speak up about a workplace concern helps build a healthy, ethical, and legally compliant company. To promote this culture, the Boyd Group encourages employees to promptly speak up and raise questions and concerns about any situation that may violate the following:

- The Boyd Group's Code of Business Conduct and Ethics, and other policies;
- The laws, rules and regulations that govern our business operations; and

• Applicable accounting, auditing and financial reporting standards.

We strive to achieve an environment that fosters honest, good faith communications about matters of conduct related to our business activities, whether that conduct occurs within the Boyd Group or involves one of our business partners, including contractors, suppliers, consultants or customers, or any other party with a business relationship to the Boyd Group.

# 5. PARTS OF BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR AND STEPS TAKEN TO ASSESS AND MANAGE THAT RISK

Based on publicly available reporting, there is reason to believe that certain elements of the automotive supply chains may pose a risk of forced and/or child labour. While the Boyd Group's primary business is the provision of services, as discussed in section 3 above, the Companies do procure certain parts and related materials in the automotive sector.

As stated above, the Boyd Group procures material from established suppliers in both Western and Eastern Canada. The Boyd Group does not import any products into Canada; rather, materials for the Canadian business are purchased from suppliers in Eastern and Western Canada. In order to complete certain repairs (particularly on newer vehicles), the Companies will procure necessary parts from the OEM, aftermarket or used parts, or recycled parts, in a manner that balances the repair costs and the insurer's requirements. The Boyd Group makes efforts to manage the risk associated with the automotive supply chain by procuring parts through a small number of trusted suppliers and OEMs, wherever possible.

# 6. MEASURES TAKEN TO REMEDIATE FORCED LABOUR AND CHILD LABOUR

Based on its knowledge, the Boyd Group has not identified any instances of forced labour or child labour in its supply chains. Consequently, no remediation measures were required for the fiscal year ended December 31, 2023, in respect of any modern slavery – including forced labour or child labour – in the Boyd Group's supply chains.

# 7. MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO MOST VULNERABLE FAMILIES THAT RESULT FROM MEASURES TAKEN TO ELIMINATE USE OF FORCED LABOUR AND CHILD LABOUR

As noted above, as the Boyd Group has not identified any instances of forced or child labour in its supply chains, it has not taken any associated measures to remediate loss of income to the most vulnerable families that result from measures taken to eliminate the use of forced or child labour in their supply chains.

# 8. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

At the Boyd Group, we prioritize ethical conduct and recognize the critical role of our employees in shaping our company culture and driving our business success. Therefore, we are dedicated to enhancing employees' understanding of our policies and procedures. In 2021, we established a

goal to achieve 100% formal acknowledgement of our Code of Business Conduct and Ethics from all employees annually by 2023. This goal was completed as of December 31, 2023.

# 9. HOW ENTITY ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR IS NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS

The Boyd Group is actively working to assess its environmental, social, and governance ("**ESG**") performance, and identify priority areas. While the Boyd Group currently does not employ formal metrics in order to assess its effectiveness in ensuring that forced labour and child labour is not being used in its business and supply chains, we do actively consider business ethics – including the practices of its suppliers – as part of its ESG assessment. The Boyd Group continues to examine various policies, processes and technical deliverables needed to address critical business risk.

#### **ATTESTATION**

This report has been approved by the Board of Directors of Boyd Group Services Inc. on its own behalf and on behalf of the other reporting entities.

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. For clarity, I am providing this attestation in my capacity as a director and officer of Boyd Group Services Inc., and not in my personal capacity.

By:

Name: Tim O'Day

Title: Director and President & CEO, Boyd Group Services Inc.

I have authority to bind Boyd Group Services Inc.

Tim O'Day

Date: March 19, 2024