International Motors Canada ULC
Modern Slavery Report 2025

About International Motors Canada

We, at International Motors Canada ULC ("International Motors Canada", "we" or "our"), are part of a larger group of International Motors, LLC companies (collectively, the "International Motors Group" and individually "International Motors").

International Motors Canada is an unlimited liability corporation incorporated in Nova Scotia and headquartered in Ontario. Our core business involves the marketing and distribution in Canada of medium and heavy trucks and school buses, primarily in the Class 6 through 8 vehicle markets.

At International Motors Canada, we are aware of our responsibility to respect human rights and the environment. International Motors Canada therefore commits to respecting human rights as stipulated in the International Motors Group Policy Statement on Human Rights, and to fulfill applicable human rights due diligence laws. We have been anchoring respect for human rights within our organization and business conduct, all within our sphere of influence. At International Motors Canada, we acknowledge the Declaration of Human Rights adopted by the United Nations and the UN Guiding Principles on Business and Human Rights, which form the basis for our approach to observing and respecting human rights, including with respect to preventing and reducing the risk that forced labour or child labour is used by us or in our supply chains.

Scope

This document outlines the steps we have taken between January 1, 2025, and December 31, 2025, aiming to prevent and reduce the risk that forced labour or child labour is used by us or in our supply chains. It includes descriptions of the policies and procedures we rely on to detect and eliminate any abuses that may exist in our supply chain.

While we are part of the larger International Motors Group, this report, in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"), relates solely to International Motors Canada, including its reliance on activities of the International Motors Group. Other companies in the International Motors Group may report in different jurisdictions on their own activities.

Our Structure, Activities, Supply Chains

International Motors Canada engages in the wholesale and retail sale and distribution of trucks and buses, primarily, and their component parts. We import a majority of these goods from other members of the International Motors Group located outside of Canada.

Trucks and buses imported by International Motors Canada are produced in the United States and Mexico, while parts are imported from other jurisdictions as well. We rely on other International Motors Group companies to source the goods that we ultimately import into Canada for sale and distribution. As such, our practices for preventing and reducing the risk of child labour and forced labour in our supply chains are integrated with the practices of other International Motors Group companies, whose policies and procedures we adhere to.

Our Commitment to Preventing and Reducing the Risk of Child Labour and Forced Labour in our Supply Chains

At International Motors Canada, we take responsibility, not only for our products, but also for our people and for the consequences our business can have.

International Motors Group has in place multiple measures aiming to prevent and reduce the risk that forced labour or child labour is used at any step in the production of components incorporated into our products.

- *Mapping supply chains and assessing risks:* International Motors Group uses a third-party risk-based supply chain mapping tool that uses publicly available information to identify business relationships between entities and potential connections to forced and/or child labour.
- *Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities*: International Motors Group has created and implemented a program laying out our expectations related to human rights, consisting of: 1) the

International Motors Group Policy Statement on Human Rights published on the International Motors website, 2) the Code of Conduct for Employees, 3) the Code of Conduct for Suppliers & Business Partners, 4) employee and supplier training, and 5) a grievance mechanism published on the International Motors website.

In addition, International Motors Group has additional requirements for the sourcing of certain materials, for example, the purchasing of cobalt from mines that have been audited by the Initiative for Responsible Mining Assurance ("IRMA").

- ***Engaging with suppliers, supplier requirements, contractual requirements and monitoring activities***:

  As it relates to its suppliers and business partners, the International Motors Group's processes include the following preventative measures which apply to its suppliers and business partners: 1) the Code of Conduct for Suppliers & Business Partners, 2) screening against sanctioned party lists and adverse media, 3) training opportunities, 4) sustainability rating ("S-Rating"), and 5) supply chain mapping (i.e. tier mapping).

  In 2025, the International Motors Group (including International Motors Canada) continued the process of onboarding suppliers to an S-Rating requirement which went into effect in January 2024. Among other factors, the S-Rating evaluates suppliers' commitments to human rights, including the prevention of forced labour and child labour. Effective as of January 2024 and continuing during the reporting year, the International Motors Group, including International Motors Canada, began requiring positive S-Ratings for high-value new business awards. International Motors Canada relies on the S-Rating described above to monitor supplier compliance with the Code of Conduct for Suppliers & Business Partners.

  International Motors Group has also continued to offer training opportunities for its suppliers and business partners (including the suppliers of International Motors Canada).

  International Motors Group has in place anti-forced labour clauses requiring compliance with applicable laws and its Code of Conduct for Suppliers & Business Partners through its Standard Terms and Conditions.

- ***Developing and implementing anti-forced labour and/or -child labour standards and grievance mechanisms***:

  International Motors Group outlines anti-forced labour and child labour standards in its Code of Conduct for Employees and its Code of Conduct for Suppliers & Business Partners. Additionally, the International Motors Group is a member of and participates in the United Nations Global Compact, through its United States-based company.

  International Motors Group's whistle-blowing system provides a confidential and secure mechanism for reporting potential misconduct, including misconduct on the part of International Motors Canada suppliers and business partners. Information that is reported through the whistle-blowing system is managed through a grievance mechanism. International Motors Group also has a committee to address concerns received about its suppliers and business partners, which International Motors Canada relies on to ensure that grievances arising in its supply chains are investigated and addressed appropriately.

  Additionally, potential violations of our Code of Conduct for Suppliers & Business Partners are entered into the grievance mechanism for tracking.

- ***Developing and implementing training and awareness materials***:

  International Motors Group has both internal and external training covering, among other topics, forced labor and child labor risks in our supply chain.

  In 2025, the International Motors Group focused its human rights training efforts on the rollout of mandatory training for the production workforce in the United States, Canada, and Mexico. This initiative was launched in 2025 and remained in progress at year-end. In addition, all new hires (including newly appointed executives) completed Code of Conduct training, which includes content related to human rights. Procurement professionals also received additional training related to child labour and forced labour risk.

By participating in these International Motors Group measures, we drive compliance within our own organization and in our supply chain to prevent and reduce the risk of child labour and forced labour.

International Motors Canada Identifies Human Rights Risks

International Motors Group including International Motors Canada regards human rights violations as a dynamic and permanent risk. Therefore, International Motors Group, including International Motors Canada, aligns procedures to monitor these potential risks with ongoing processes such as the implementation of human rights and environmental aspects in the International Motors Group compliance risk assessment. At the same time, International Motors Group including International Motors Canada has a responsibility to remediate in case we have caused or contributed to a human rights violation or discover any such action by a supplier or business partner of ours. Human rights risks are not only assessed in International Motors Group's own business area but are also considered in the selection and due diligence process of suppliers and business partners.

International Motors Canada Addresses Human Rights Risk

The International Motors Group Policy Statement on Human Rights requires that all our measures and guidelines for human rights are structured to protect all rights holders in the best way possible. Preventing and addressing possible violations is therefore an essential part of our approach.

When we or International Motors Group receive information about cases of suspected misconduct, it is investigated immediately to find solutions to stop actual violations and to limit and mitigate any negative impact. In the event of substantiated knowledge of a violation in our supply chain, International Motors Group seeks dialogue with the supplier or business partner and first tries to find a common solution that ensures future adherence to human rights. If required, International Motors Group makes use of contractually agreed audit rights to obtain further information on potential violations and risks and for identifying and implementing mitigating measures. However, if suppliers do not take sufficient action to prevent, end or mitigate the extent of human rights violations, this may result in the termination of the collaboration with the supplier or business partner.

The International Motors Investigation Office serves as means of processing tip-offs concerning International Motors Group members (including International Motors Canada). It monitors and coordinates investigations together with the responsible investigating unit based on the nature of the grievance.

The International Motors Investigation Office confirms the receipt of the tip-off and aligns with the whistleblower on additional relevant information, wherever possible and necessary. If the International Motors Investigation Office is informed about a potential risk that does not involve International Motors Group employees (such as potential violations by suppliers) the International Motors Investigation Office will forward this information to a suitable department within the International Motors Group.

All allegations are investigated in accordance with principles defined in the International Motors Group's Policy on Internal Investigations, such as the protection of whistle-blowers, procedural fairness, confidentiality, and principle of legality. Results of an investigation are reported to either the Investigations Operating and/or Investigations Review Committees, who decide on further measures to be implemented.

International Motors Canada Assesses the Effectiveness of its Risk Reduction Activities

In 2025, the International Motors Group continued to review and update the organization's policies and processes around human rights with a focus on forced labour through a cross-functional supply chain due diligence working group. International Motors Canada participates in the activities of that working group.

In addition, International Motors Canada benefits from the work of the International Motors Group Business & Human Rights Committee, which is made up of representatives of various cross-functional departments, including Legal, Compliance, People & Culture, Procurement, Finance, Sustainability, Trade Compliance and Supplier Quality. The Business & Human Rights Committee's primary role is to monitor and advise on the implementation of Human Rights related obligations, including but not limited to the following topics: risk management system, risk analysis, preventive measures, remedial actions, and grievance mechanism. It meets regularly on a quarterly basis and ad-hoc, if necessary.

International Motors Canada relies on the policies, processes, and training the International Motors Group develops and maintains in order to assess and ensure the effectiveness of the steps it takes to prevent the risk of child labour or forced labour being used in its supply chains.

Based on the current findings of the International Motors Group's assessment activities, we have not had to take remedial steps in 2025 to address forced labour or child labour or its impact on individuals or their families.

Conclusion

International Motors Canada's management is responsible for the implementation of the actions and requirements defined in this report and for the further development of our practices to prevent or reduce the risk of child labour or forced labour in our organization and in our supply chains. International Motors Canada has the responsibility to adequately address negative human rights impacts that are linked to our own business area, products, or services through our business relationships. Therefore, we strive to work with suppliers and business partners who share these values and the commitments required of them as described in this report. Where there are conflicting local human rights laws or standards, or where state/provincial jurisdiction and/or enforcement are different from international human rights laws or standards, we shall seek ways to respect human rights in line with international human rights conventions and standards while complying with applicable federal, state, provincial and local law.

Helpful Links

The International Motors Group Policy Statement on Human Rights:
https://www.international.com/-/media/project/tratongroup/international/international/our-company/governance/international-policy-statement-on-human-rights.pdf?rev=b41244930d5d40d49ff623de186fff48

The International Motors Group Code of Conduct for Employees
https://www.international.com/-/media/project/tratongroup/international/international/our-company/governance/code-of-conduct-3204-0.pdf?rev=c2a3712e3ab64679a98b4720faead04f

The International Motors Code of Conduct for Suppliers & Business Partners:
https://www.international.com/-/media/project/tratongroup/international/international/our-company/governance/navistar_supplier-coc-final-062223.pdf?rev=16a631550bd5446cb8812b57a0604c7e

The International Motors Group Standard Terms & Conditions can be found on our supplier-facing website:
https://www.navistarsupplier.com/Documents/Supplier%20Guidelines/PRC200-A%20International%20Standard%20Terms%20and%20Conditions%20-%20Production%20and%20Service%20rev.24.pdf

Information regarding the International Motors Group Whistleblowing Channels:
https://www.international.com/our-company/whistleblower-reporting

Approval:

This report was duly approved by the board members of International Motors Canada ULC on May 14, 2026.

Attestation:

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 on behalf of the entity listed above. To my knowledge, 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 within this report.

Full name: Gregory Booth
Title: Corporate Controller
Date: May 26, 2026

I have the authority to bind International Motors Canada ULC

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