

BILL S-211

An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff

Modern Slavery Statement for the Financial Year ended 2023

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by General Coach Canada to identify and address the risks forced labour and child labour in its business operations and supply chains during the financial year commencing January 1st, 2023 and ending December 31st, 2023.

Company Structure

General Coach Canada (legal name Citair Inc.) was established in 1950, located in Hensall, Ontario, Canada. General Coach Canada is a sole proprietorship, family managed business manufacturing Park Model Trailers, Theatrical and Travel Trailers, Cabins, Commercial Units, and Manufactured Homes out of two local production facilities. General Coach Canada employs individuals at the managerial, administrative, supervisory, and frontline levels.

Supply Chain

General Coach Canada purchases from various building material suppliers, local fabricators, OEM manufacturers, wholesalers, and distributors of: home goods, furnishings, and RV components. These goods are predominately purchased and shipped from Canadian, and American markets.

Risks in Supply Chain

General Coach Canada is committed to respecting human rights and ensuring that forced labour and child labour is not a part of any part of its supply chain. An identified area of risk would be the use of importers for raw materials and components used by some OEM manufacturers and distributors.

Actions Taken

General Coach Canada annually requests CUSMA (Canada-United-States-Mexico Agreement) documents from all applicable suppliers. CUSMA includes customs provisions that prohibit the importation of goods produced by means of forced/child labour or through discriminatory practices. Updated and signed documents are filed with a 3rd party customs broker and presented to the Canada Border Services Agency.

General Coach Canada has Employee Equity and Hiring Policies that align with the Canadian Charter of Rights and Freedoms. These policies have guidelines against using child labour, slave labour, and bribery by anyone in our supply chain to facilitate manufacturing at General Coach Canada.

The minimum age to work at General Coach Canada is 16, however, those hired under 18 years of age will not be employed during school hours unless they have been excused from school attendance under provisions of Ontario's' Education Act. All employees of General Coach Canada will be employed under their own free will, and have the right to refuse or stop work where health and safety are in danger under provisions of the Occupational Health and Safety Act.



Risk Assessment and Training

General Coach Canada does not consider their supply chain high risk. Employee's responsible for procurement at General Coach Canada will be provided with awareness-raising activities about the code and ethical sourcing of goods and services. This training will include an information piece on human rights and freedoms, a pledge to a workplace and supply chain free of forced and child labour.

Remediation

General Coach has not identified instances of forced labour or child labour in its supply chains and thus has not undergone any action for remediation. Suppliers will be notified of the requirement to comply with our policies and recordings of this notification will be kept on file.

Effectiveness Assessment

To assess the effectiveness of the of the preceding measures, General Coach engages in a process of continuous improvement which includes a periodic review of policies to determine whether updates are warranted.

Sign Off

This Statement is made in pursuant to Bill S-211, And Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains for the fiscal year ending April 30th, 2024. It has been issued on behalf of Citair Inc. (dba General Coach Canada).

Signed May 31, 2024

Roger Faulkner President/Owner

General Coach Canada