



ROADTREK INC.

Modern Slavery Report (For the Year Ended August 31, 2023)

1. Introduction

This report is made pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") and constitutes a joint report for Roadtrek Inc. ("**Roadtrek**"), Leisure Invest North America Inc. ("**LINA**"), and VDL Participation SAS ("**VDL**", together with Roadtrek and LINA, the "**Reporting Entities**"), for the year ended August 31, 2023. A copy of this report will be available on Roadtrek's website.

2. Structure, Activities and Supply Chains

Roadtrek is an Ontario corporation with a sole focus on building quality Class B Motorhomes for the North American market. Roadtrek is one of the 12 brands offered by the Rapido Group. Being part of the Rapido Group brings forth many advantages, including ongoing product development, technological advancements, European styling and a family-owned group with a constant focus on customer satisfaction, quality and attention to detail.

Roadtrek's main suppliers consist of two Canadian and two American chassis suppliers. Raw materials used in the manufacturing process are purchased mainly from 75 companies located in the United States, 17 located in Canada, seven located in the European Union (Belgium, Germany, France Italy and Netherlands), and two located in China (that originally supplied Roadtrek via Amazon).

LINA is an Ontario corporation that is a holding company and the parent of Roadtrek.

VDL is a French holding company and the parent of LINA.

3. Roadtrek's Policies and Due Diligence Processes

Since the Reporting Entities have a year-end of August 31, 2023, Roadtrek had insufficient time in 2023 to enact policies and due diligence processes in relation to forced labour and child labour after the Act received royal assent on May 11, 2023. Roadtrek has since begun the development of such policies and processes.

In 2024, Roadtrek began the process of developing an Employee Handbook. The Employee Handbook will contain the policies set out below that either directly or indirectly relate to forced labour or child labour in respect of Roadtrek's business and operations:

- (a) **Modern Slavery Act Policy:** This policy specifically addresses issues of forced labour and child labour in Roadtrek's supply chains and manufacturing facilities. To work at Roadtrek's RV manufacturing operations, individuals must be at least 19 years old.
- (b) **Right to Refuse Unsafe Work / Employee Rights Policy:** This policy reinforces the requirement of the *Occupational Health and Safety Act* (the "**OHSA**") that all employees have the right to refuse work if they believe that the equipment, machine, or device may pose a danger to themselves or their co-workers. In complying with the OHSA, no employee will face retaliation for acting.

- (c) **Right to Disconnect Policy:** This policy reinforces the guidelines outlined in Ontario's *Employment Standards Act* regarding work hours and overtime, and prioritizes the health, safety and well-being of Roadtrek's employees.
- (d) **Human Rights Policy:** Roadtrek is committed to protecting the human rights of Roadtrek's employees, regardless of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, record of offenses (pardoned), marital status, family status, or disability. The following, among others, outline this commitment:
- Complying with human rights laws in regions in which Roadtrek conducts business;
 - Complying with labour laws and standards;
 - Not using any forced, involuntary, compulsory, indentured or slave labour in any of Roadtrek's business activities or operations;
 - Expecting that Roadtrek's suppliers conduct their business in a manner consistent with its values, including with respect to human rights; and
 - Periodically reviewing Roadtrek's Human Rights Policy.

4. Identification and Assessment of Risks of Forced Labour or Child Labour in Roadtrek's Activities and Supply Chains

As referenced in Section 3 of this Report, given Roadtrek's year-end of August 31, 2023, the company had insufficient time to identify specific risks in relation to forced labour and child labour in 2023.

According to the [Walk Free Global Slavery Index](#), Canada and the United States rank among the lowest countries in terms of prevalence of, and vulnerability to, modern slavery. As mentioned in Section 2 of this Report, Roadtrek's main suppliers are from these two countries. Roadtrek's raw materials suppliers located in China are not located in the Xinjiang Uyghur Autonomous Region, which has been cited for numerous human rights violations relating to forced labour.

5. Remediation Measures

In 2023, Roadtrek did not identify any forced labour or child labour in its activities and supply chains, and as such, no remediation measures have been taken. In addition, Roadtrek has determined that no vulnerable families have experienced a loss of income as a result of steps taken to eliminate forced labour and child labour risks.

6. Training Provided to Employees on Forced Labour and Child Labour

As Roadtrek did not have policies and due diligence processes in place in 2023, employees were not provided with training specific to forced labour and child labour.

However, it is expected that starting in 2024, as part of their orientation and training, employees of Roadtrek will be required to review the Employee Handbook, which includes the policies indirectly or directly related to forced labour and child labour, as referenced in Section 3 of this Report.


7. Assessing Roadtrek's Effectiveness

As Roadtrek has not identified any forced labour or child labour in its activities and supply chains, no formal assessment processes were implemented in 2023 with regards to the effectiveness of ensuring that forced labour and child labour are not being used in its business and supply chains. Roadtrek will consider the implementation of such processes in 2024.

8. Approval and Attestation

This Report was approved pursuant to Section 11(4)(b)(ii) of the Act by the directors of VDL, since VDL controls all of the 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.



Name: Nicolas Rousseau

Title: CEO

Date: May 31, 2024

I have the authority to bind VDL Participation SAS

VDL PARTICIPATIONS

S.A.S. au capital de 551 880 €

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