



PETERBILT **PACIFIC**

Peterbilt Pacific Inc.

Modern Slavery Act Report 2025

This Modern Slavery Act Report (the “**Report**”) addresses the period from January 1, 2025 to December 31, 2025 and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Act**”).

This Report is made on behalf of **Peterbilt Pacific Inc.** (“**PPI**”) and is not a joint report.

## **I. INTRODUCTION**

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a prominent dealer of heavy-duty trucks for over 50 years, PPI recognizes the important role that it has in ensuring that the supply chains that support its operations and products adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour. This Report sets out the steps we have taken during the 2025 fiscal year to prevent and reduce the risk that forced labour or child labour is used at any of our locations in Canada or elsewhere by PPI or of goods imported into Canada by PPI.

## **II. CORPORATE OVERVIEW AND SUPPLY CHAINS**

Established in 2015, PPI is a division of the Jim Pattison group of companies with roots back to a family owned Peterbilt heavy-duty truck dealership started in 1986. As one of Canada's largest Peterbilt dealers, PPI prides itself on its commitment to integrity for its employees and customers. With 13 locations, over 80 service bays, and two collision repair shops, the dealership offers sales and services for the most sought-after trucks globally, accompanied by superior customer care. PPI also offers full-service truck leasing through our PacLease division. Throughout its locations in British Columbia, Canada, PPI maintains its long-established standards of excellence, proven durability, and high resale value for trucks. PPI employs approximately 350 people in its 13 locations across British Columbia. The head office of PPI is located at 9515 195 St, Surrey, BC, Canada.

The original equipment manufacturer (OEM) for all our new heavy-duty trucks is Peterbilt Motors Company, parent company Paccar, whose head office is in Denton, Texas, USA. Peterbilt Motor Company has 3 plants where the heavy-duty trucks are assembled: one in Denton, Texas, USA, one in Sainte-Therese, Quebec, Canada and one in Mexicali, Baja California, Mexico. A large percentage of our parts purchases for our retail stores, service bays and repair shops are sourced from Paccar Parts, a division of Paccar. Paccar Parts is in Renton, WA, USA. In the fiscal year 2025, the Paccar group of companies constituted a significant portion of our procurement, accounting for 70% of our total supply purchases.

PPI is subject to the reporting requirements under the Act but is not required to produce similar reports under any other jurisdiction.

Our company proudly serves a Canadian clientele, with the majority of our customers in the province of British Columbia.

In total, we procure goods and services from approximately 675 suppliers and contractors.

Further information about our business can be found on our website [www.peterbiltpacific.com](http://www.peterbiltpacific.com).

### III. POLICIES AND DUE DILIGENCE PROCESSES

#### Policies

Through our Business Code of Conduct and Whistle Blower policies, we communicate our values and expectations, setting a high bar for ourselves and our suppliers, and make it clear that we do not tolerate any forms of forced labour or child labour. We are committed to evolving and improving our approach. We do not tolerate child, forced or bonded labour in any of our operations, or in the operations of our suppliers and other business partners. Our policies are included in our employee orientation manual which is posted on the workplace employee website. Our relevant policies are discussed in further detail below:

#### **Business Code of Conduct** (enacted May 2017)

We are committed to conducting our business lawfully and ethically. Our Business Code of Conduct is the foundation of our company policies and sets out guiding principles on professional conduct and establishes that in performing their job duties, PPI employees should always act lawfully, ethically and in good faith with employees and non-employees.

#### **Whistleblower Policy** (enacted September 2018)

We are committed to maintaining high ethical standards and legitimate business practices and wish to encourage the identification and prevention of any misconduct that may affect this commitment. The Whistleblower Policy aims to provide an avenue for employees to raise serious concerns with the reassurance that they will be protected from reprisal or victimization for whistle-blowing in good faith.

#### **Child Labour Policy** (enacted June 2024)

Peterbilt Pacific is committed to upholding the highest standards of child labour laws as outlined by the Province of British Columbia. We will ensure that all young workers are employed in safe working conditions and in compliance with the legal requirements. This policy is to ensure that Peterbilt Pacific complies with the *Employment Standards Act* (British Columbia) and promotes the safety and well-being of young workers.

#### **Supplier Code of Conduct** (enacted May 2025)

The Supplier Code of Conduct sets out the expectations we have of our suppliers, their supply chains, and those with whom we do business. We expect our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate. We also expect our suppliers to share in our commitment to respect human rights and strive to meet the highest ethical business standards.

## **Due Diligence**

We expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

To mitigate potential forced labour and child labour risk, we follow a due diligence approach that includes the following steps:

- Our largest supplier, Peterbilt Motors Company, regularly invites their dealers to come visit and tour the plants where the heavy-duty trucks are assembled;
- Reviewing supplier Ethics and Compliance policies to ensure their code includes provisions banning child or forced labour, respecting employee rights and providing a safe workplace for employees; and
- Embedding responsible business conduct into policies and management systems.

## **IV. RISK ASSESSMENT AND MANAGEMENT**

PPI engages in various activities to identify, assess, and manage supplier risk. In assessing the risk of forced and child labour in our business and supply chains, we engage with our peers to discuss risks.

PPI has low risk in its business activities as all its locations are in British Columbia, Canada and all employees are screened through its Human Resources department at the Head Office in Surrey, BC. PPI adheres to all Canadian and British Columbia employment laws.

Our exposure to the risk of forced labour and child labour increases when we engage with third parties, particularly in categories such as transportation, manufacturing, and raw material sourcing. We recognize that our exposure to forced labour and child labour increases when we engage with suppliers who source goods or raw materials from countries where forced labour or child labour exploitation is known to occur. As such, we follow a risk-based approach to our due diligence activities. Our due diligence is prioritized to the most significant adverse impacts based on severity and the likelihood of harm.

Within the organization the executives (including the President, Keyvan Hunt) of the company is responsible for identifying and responding to forced labour and child labour risks, including senior-level oversight structures, and how the organization engages with external stakeholder.

## **V. MODERN SLAVERY REMEDIATION MEASURES**

### **Steps to Prevent and Reduce Risks of Forced and Child Labour**

- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily;
- Engaging with our supply chain partners on the issue of addressing forced labour and child labour;
- Prioritization to focus due diligence efforts on the most severe risks of forced labour and child labour; and
- Monitoring suppliers.

### **Remediation Measures**

We expect our suppliers to adhere to high standards of ethical conduct. Forced and child labour is strictly prohibited. We also undertake diligence efforts (as further described in this Report) to ensure that the risk of forced labour and child labour is mitigated in our business.

If we discover any forced labour or child labour in our business and supply chains, we take the following measures to remediate such forced labour or child labour:

- Suspension or termination of a supplier, sub-supplier or contractor;
- Actions to prevent forced labour or child labour and associated harms from reoccurring;
- Actions to support victims of forced labour or child labour;
- Grievance mechanisms; and
- Formal apologies.

## **VI. LOSS OF INCOME – REMEDIATION MEASURES**

As we have not identified any instances of forced labour or child labour in our operations and supply chains, we have not taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in our supply chains.

## **VII. TRAINING**

In 2025, we did not have specific, formalized training in place to understand and mitigate the risk of forced labour or child labour. Our Human Resources team ensures a comprehensive onboarding process for all

new hires, adhering strictly to the employment laws of Canada and British Columbia. Additionally, PPI retains a specialized employment lawyer to provide clarity on any complex legal matters.

Our team is actively developing procurement policies and resources. As awareness of this issue grows, we have observed a substantial increase in inquiries from different parts of the organization seeking guidance on making procurement decisions that prevent potential human rights violations within our supply chain.

#### **VIII. ASSESSING EFFECTIVENESS**

As part of our governance processes, we monitor compliance with our policies on an ongoing basis. We also review any concerns raised through our Whistleblower Policy and other informal mechanisms of employee feedback.

To date, no significant concerns or complaints have been identified.

#### **IX. APPROVAL AND ATTESTATION**

This Report was approved pursuant to section 11(4)(a) of the Act, and has been submitted to Public Safety Canada. This Report is also available on our company website at [www.peterbilt.com](http://www.peterbilt.com).

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in the capacity of President, attest that I have reviewed the information contained in this Report for PPI. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this Report.



**Keyvan Hunt on behalf of Peterbilt Pacific Inc.**

**President, May 31, 2026**

I have the authority to bind Peterbilt Pacific Inc.