



**REPORT UNDER THE *FIGHTING AGAINST FORCED LABOR AND CHILD LABOR  
IN SUPPLY CHAINS ACT***

**FINANCIAL YEAR ENDED DECEMBER 31, 2024**

## **Application**

This report is prepared in accordance with the Fighting Against Forced Labor and Child Labor in Supply Chains Act (Canada) (the "Act") and pertains to APCO Holdings, LLC, along with its wholly owned subsidiaries National Auto Care Corporation and GlassParency Products, Inc., (collectively referred to as the "Corporation," "we," or "us").

In compliance with the Act, we report to the Minister of Public Safety and Emergency Preparedness on the steps taken during the financial year ending December 31, 2024, to mitigate the risk of forced labor or child labor in our production and supply chain activities within Canada and internationally.

## **Measures to Prevent and Reduce the Risks of Forced Labor and Child Labor**

To ensure compliance with the Act, we expanded our previous comprehensive review of our Human Resources policies, supplier contracts, order documentation, publicly available supplier information, employee training materials, and supply chain practices.

## **STRUCTURE, ACTIVITIES, AND SUPPLY CHAIN**

### **Corporate Overview**

APCO Holdings, LLC is engaged in providing products and services related to automobile ownership. The majority of our revenue is derived from the sale and administration of service contracts, financial products, and other agreements associated with vehicle ownership and maintenance.

As a minor product offering, we sell chemical products and their application kits; the chemicals are designed to protect vehicle surfaces such as paint, windshields and interior surfaces. In Canada, we distribute these protective application products through commercial entities, with a negligible amount of sales occurring through direct to consumer websites.

### **Our Activities and Supply Chains**

Our supply chain primarily consists of raw materials and finished goods sourced from the United States. However, one component of our application kits—application cloth wipes—is manufactured in China.

In 2024, our Canadian product sales revenue amounted to \$134,007.66 CAD (\$96,135.20 USD) from protective applications. These sales represent less than 0.1% of APCO's total applied-product revenue.

## Policies and Due Diligence Processes

We uphold a zero-tolerance policy towards forced labor and child labor across our operations and supply chain. Our core policies include:

- **Prohibition of modern slavery:** No form of forced, bonded, indentured, or prison labor is permitted.
- **Voluntary employment:** All employees work on an at-will basis and are free to terminate their employment at any time.
- **Harassment-free workplace:** Our policies strictly prohibit any form of harassment or coercion.
- **Confidential reporting mechanisms:** Employees have access to an anonymous hotline to report concerns.

Given that our operations are predominantly U.S.-based, our due diligence focused on human resources policies, supplier reviews, and procurement processes. Our key suppliers operate in low-risk regions for forced labor, primarily within the United States.

## Determining the Risk of Forced Labor or Child Labor

### a. Among Our Personnel

The risk of forced labor or child labor among our personnel is assessed as negligible. Our Board of Directors, VP of Human Resources, and executive leadership oversee compliance with labor standards. Our recruitment processes align with U.S. labor laws and best practices

### b. Within Our Supply Chains

While our first-tier suppliers are based in low-risk regions, we acknowledge that risks may exist further down the supply chain, particularly for components sourced from China. At present, our supplier monitoring mechanisms are limited to direct suppliers.

In 2024, our procurement of applied product kits was conducted through purchase orders rather than formal contracts. We are continuing to modernize our supplier accountability measures, including:

- Requiring written contractual agreements or assertions from *all* suppliers, that contain explicit commitments to ethical sourcing.

One of our two Chinese suppliers has demonstrated commitment to **International Labor Organization (ILO) conventions, The Labor Law of the People's Republic of China**, and local labor regulations. We communicated to the second supplier that we will require a similar commitment in writing as a prerequisite to continued purchases in 2025.

## Steps Taken to Assess and Manage the Risk in our Operations and Supply Chains

To enhance our supply chain oversight and strengthen our commitment to ethical labor practices, we implemented the following actions:

- **Developing formal supplier agreements** to reinforce anti-forced labor commitments.
- **Conducting risk assessments** to identify vulnerabilities in indirect supply chains.
- **Explored third-party oversight mechanisms** for suppliers operating in higher-risk regions.
- **Enhanced procurement policies** to incorporate ethical sourcing requirements.
- **Drafted policies prohibiting and renouncing modern day slavery and child labour practices.**

## **Remediation Measures**

In the last financial year, we did not identify any incidents of forced labor or child labor within our operations or supply chain. As a result, no remediation measures were required.

## **Training Provided To Employees**

In the last fiscal year, APCO Holdings, LLC. recruited additional training professionals within our Human Resources Department that are responsible for creating and implementing employee training with a focus on improving hiring practices. We identified corporate responsibility training that addresses, among other things, an explanation about how to combat modern day slavery and child labor, and we are implementing this training across our organization for personnel who make purchasing decisions.

## **Continuous Improvements and Prospective Interventions**

To further strengthen our commitment to ethical labor practices, we are developing a **Responsible Sourcing Roadmap** that includes:

- **Enhanced supplier verification processes to ensure ethical material sourcing.**
- **Greater transparency in supply chain documentation to trace product origins.**
- **Training initiatives for employees involved in hiring and procurement.**
- **Written commitments from suppliers to uphold human rights protections.**

As of 2024, our **Human Resources Department** updated our **Employee Handbook**, published in 2025. This revised policy explains our commitment to human rights and establishes clear guidelines for employees on reporting any labor violations within the Corporation or its supplier network.

## **APCO HOLDINGS, LLC. ANTI-FORCED LABOR & ANTI-MODERN SLAVERY POLICY**

This policy outlines our commitment to preventing forced labor, modern slavery, and human trafficking within our organization and across our supply chain. It establishes standards for employees, suppliers, contractors, and partners to uphold human rights, ensure ethical practices, and promote safe and fair working conditions.

### **Scope**

This policy applies to all employees, contractors, suppliers, and business partners. It covers all forms of forced labor, bonded labor, involuntary servitude, child labor, and any activities that may contribute to modern slavery.

### **Policy Statement**

Our organization is dedicated to:

Respecting human rights and upholding labor standards in accordance with the International Labor Organization (ILO) conventions, the United Nations Guiding Principles on Business and Human Rights, and local laws and regulations.

Conducting business in a manner that prevents exploitation, abuse, and any form of forced labor or modern slavery.

Implementing transparent and ethical practices across our operations and supply chains.

### **Definitions**

**Forced Labor:** Work or services exacted from a person under threat of penalty and for which they have not offered themselves voluntarily.

**Modern Slavery:** Encompasses forced labor, human trafficking, debt bondage, and other exploitative practices that violate fundamental human rights.

### **Standards and Requirements**

**Voluntary Employment:** Employment must be voluntary, and employees are free to leave employment upon reasonable notice. No worker should be coerced, threatened, or subjected to physical or psychological abuse.

**Prohibition of Child Labor:** We strictly prohibit the employment of individuals under the minimum legal working age or who are otherwise considered child laborers as defined by ILO standards and applicable laws.

**Transparent and Fair Recruitment:** Workers shall not be required to pay recruitment fees or other related expenses. We will ensure transparency in recruitment practices, fair employment terms, and clearly communicate these to all workers.

**Freedom from Bondage and Debt:** Workers shall not be held in debt bondage or forced to work under exploitative terms to pay off loans or other obligations.

**Safe Working Conditions:** All employees must be provided with a safe, clean, and healthy work environment. We will uphold workers' rights to freedom of association and collective bargaining.

### **Supplier and Partner Accountability**

**Supplier Code of Conduct:** All suppliers, contractors, and partners must adhere to our standards and uphold ethical practices. They are required to commit to anti-forced labor principles and will be held accountable through regular assessments.

**Risk Assessments and Audits:** We will conduct due diligence, including risk assessments and audits, to monitor and enforce compliance with anti-forced labor standards. These audits may include unannounced visits to worksites and confidential interviews with workers.

### **Reporting and Remediation**

**Reporting Mechanisms:** All employees, suppliers, and stakeholders are encouraged to report suspected cases of forced labor or modern slavery to the Legal Counsel and/or a Human Resources Department representative. Additionally, you may also call the APCO Holdings Ethics Hotline, which is managed by an outside 3rd party vendor.

**Investigation and Remediation:** Upon receiving a report, we will promptly investigate and, where necessary, take corrective action. In cases of confirmed modern slavery, we will work to provide safe remediation and prevent recurrence.

### **Training and Awareness**

We will provide training to all employees on recognizing and reporting signs of forced labor and modern slavery. Suppliers and partners are encouraged to conduct similar training within their organizations.

### **Continuous Improvement**

Our organization is committed to continuous improvement in combating forced labor and modern slavery. We will regularly review and update this policy to reflect best practices and changes in legal and regulatory requirements.

### **Policy Review and Responsibility**

This policy will be reviewed annually by our Human Rights Committee or equivalent governing body. The CEO, alongside our Human Resources team, is responsible for its implementation, oversight, and adherence across our operations and supply chains.

By implementing this policy, we aim to foster a culture of respect, transparency, and ethical conduct that safeguards the rights of all individuals involved in our business.



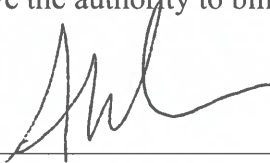
## Approval and Attestation

January 1, 2024-December 31, 2024

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.

I have the authority to bind APCO Holdings, LLC.

By:

  
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Name: Anton Wanderon

Title: Chief Executive Officer

Date:

5/23/25