

Harley-Davidson Canada Inc. 2024 Supply Chain Act Annual Report

This document constitutes the Annual Report (the “**Report**”) pursuant to section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (the “**Supply Chain Act**” or the “**Act**”) and is filed on behalf of the following entities each a member of the Harley-Davidson Inc. corporate group:

- Harley-Davidson Canada LP, formerly an Ontario limited partnership (“H-D Canada LP”);
- Harley-Davidson Canada GP Inc., formerly the general partner of H-D Canada LP;
- Harley-Davidson Canada Retail Inc. (“H-D Retail”), formerly an affiliated entity of H-D Canada LP; and
- Harley-Davidson Canada Inc., successor of H-D Canada LP and H-D Retail (“H-D Canada Inc.”)

(each a “**Reporting Entity**” and collectively, the “**Reporting Entities**”, “we”, “us” or “our”) covering the financial year ended December 31, 2024 (the “**Reporting Period**”).

Forced labour and child labour are contrary to our purpose, vision and values. We do not tolerate forced labour and child labour in our organization or in those of our suppliers and subcontractors. We hold ourselves to the highest standards and expect the employees, contract workers and directors of each Reporting Entity to act with integrity and comply at all times with the letter and spirit of the laws, regulations and rules that apply to each Reporting Entity in the jurisdictions where we operate and in particular with respect to the Act. If instances arise where these expectations are not met, we will strive to respond in an appropriate manner.

This statement outlines the policies and procedures we have in place and the steps taken by us in Canada to reduce the risk of forced labour and child labour within our business and in our supply chains.

We are committed to playing our part in helping to address this through identifying risk within our business operations, implementing policies and procedures, and working with others to take steps to eradicate forced labour and child labour in our supply chain.

1. The steps we have taken during the Reporting Period to prevent and reduce the risk of forced labour and child labour

We use a **Standard Supplier Contract** which requires our suppliers to represent and undertake to ensure that all products and services are provided in accordance with all applicable laws. It also requires the supplier to observe Harley-Davidson's work policies. Execution of our form of Supplier Standard Contract by our suppliers of goods and services is an essential condition to having a commercial relationship with H-D Canada Inc. and it is mandatory for suppliers.

In addition, our suppliers agree to our **Supplier Code of Conduct** which we have updated during the Reporting Period and which contains the principles of behaviour and business rules which govern our relationship with them.

In particular, our Supplier Code of Conduct requires that suppliers be committed to respecting and promoting human rights and supporting the Universal Declaration of Human Rights including the United Nations Guiding Principles, and the International Labour Organization conventions. All our suppliers' operations and business must be free of unsafe and unfair work practices including slavery, forced labour, prison labour, human trafficking or child labour.

2. Our structure, operations and supply chains

The Reporting Entities covered by this Annual Report are a limited partnership or a corporation. The Reporting Entities are either (i) selling goods in Canada or abroad; (ii) distributing goods in Canada or abroad; or (iii) importing into Canada goods produced outside of Canada.

The Reporting Entities import and sell Harley-Davidson motorcycles, motorcycle parts, accessories, and apparel in Canada within the context of a multinational business organization. The Reporting Entities' products are sold to retail customers primarily through a network of independent dealers which are non-affiliated entities operating independently from Harley-Davidson Inc. and any of the Reporting Entities. Dealers generally stock and sell the Reporting Entities' products, and also provide servicing on customer-owned motorcycles. There are also sales of products through a dedicated online store.

Harley-Davidson enterprise operates in over 50 global markets with over 5,900 employees. In Canada, the Reporting Entities employ approximately 40 employees.

The Reporting Entities represent in Canada the Harley-Davidson brand, one of the best known global brands embodying the values of adventure and freedom for the soul.

Purchasing is carried out at two different levels in our supply chain:

- a. purchase and distribution of manufacturing motorcycles, motorcycle parts, accessories, and apparel; and
- b. procuring services, such as marketing services, customs services, and logistics services.

3. Policies, due diligence and controls

All purchasing activity across our extensive and global supply chain is based on a common framework. Harley-Davidson's **Procurement Policy** aims to manage and reduce risks associated with our suppliers. It requires appropriate due diligence to be conducted on all suppliers or vendors prior to contracting and procurement.

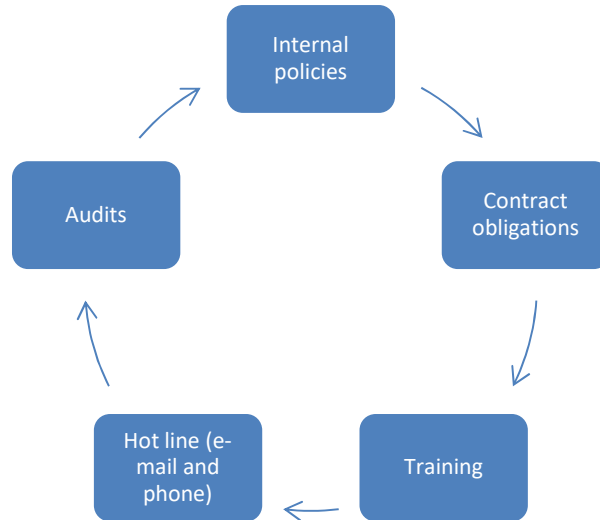
Harley-Davidson enterprise has established the following due diligence processes:

- embedding responsible business conduct into policies and management systems;
- identifying and assessing adverse impacts in operations, supply chains and business relationships;
- ceasing, preventing or mitigating adverse impacts;
- tracking implementation and results;
- communicating how impacts are addressed;
- requiring supplier cooperation in remediation when appropriate.

Suppliers that fail to comply with remediation measures will not qualify as eligible suppliers.

4. Risk Assessment Methodology and Results of Assessment

Forced labour and child labour risks in our supply chain are identified through our responsible purchasing program, which includes the following components:



This risk assessment process helps to identify either poor management policies or gaps in our policy program which can be indicators of a risk of forced labour and child labour within our supply chain. On-site audits performed as part of the evaluation may also reveal indicators of forced labour or child labour or identify a risk of exploitation.

Suppliers deemed to have a high risk through our risk assessment process will be invited to undertake an assessment through our dedicated assessment tool which produces ratings and detailed scorecards through an evidence-based assessment to understand a supplier's performance. This assessment is adapted to reflect business categories and takes into account relevant industry certifications in several countries and is aligned with global standards like the United Nations Global Compact. The areas assessed through this digital audit include the presence of and efforts to eliminate or reduce occurrences of forced labour and child labour.

We engage specialized consultants to perform digital due diligence and background check. We utilize our own trained internal audit resources to perform audits adapted to the specific circumstances of the suppliers being audited.

After completion of this assessment, we may categorize our suppliers as low, medium or high-risk, using audit and due diligence information. Depending on the level of risk identified, the validity period of the assessment is determined and where required a corrective action plan is implemented, and if necessary an on-site audit may be carried out by our specialized consultants to work with the supplier to improve their performance.

We recognize that our risk assessment process is subject to ongoing refinement and improvement. Each year we review our risk assessment process and try to eliminate possible gaps in the process.

5. Risks of forced labour and child labour in our operations and supply chains

To the best of our knowledge, we have not identified risks of forced labour or child labour in our operations and supply chains. As noted above, our risk assessment process is reviewed annually with the goal of identifying possible gaps in our assessment.

6. Our remediation processes

Our Code of Business Conduct requires all employees and contract workers to report actual or possible instances of forced labour or child labour. Employees and contract workers are

encouraged to speak to their manager, senior management, or human resources or compliance staff, or report through our whistleblower system.

Our Confidential Hotline (1-855-318-5389 and www.h-dcodehelpline.com) allows all of Harley-Davidson's stakeholders (i.e., customers, suppliers, trade unions, regulatory authorities, etc.) to report in confidence any breaches of the law, our Code of Business Conduct, or other internal policies. All reports through this system are processed and investigated as applicable, and appropriate measures are taken when justified.

Remedial Action Taken during the Reporting Period

Since we have not identified any forced labour or child labour in our activities and supply chains, we have not taken any remediation measures.

Since remediation measures have not been required, we have not identified any loss of income to vulnerable families resulting from remediation measures.

7. Our training

Understanding and complying with the Code of Business Conduct is a condition of working at any Reporting Entity, and employees and contract workers must complete the Code of Business Conduct training course and acknowledgment annually. We leverage this mandatory annual course to train all employees and applicable contract workers to look for indicators of possible violations of human rights. Each Reporting Entity works to identify, investigate and report potential cases of forced labour and child labour as a predicate offence.

8. Assessing our effectiveness

We intend to continue our assessment and refine key performance indicators to measure our success in operationalizing the commitments we have made concerning having operations free of unsafe and unfair work practices including, forced labour and child labour. The effectiveness of a Reporting Entity's industry-specific due diligence process is regularly evaluated to confirm it remains current and aligned with business activities, regulatory developments, industry standards and best practices. By doing so, each Reporting Entity adheres to all applicable laws and regulatory requirements in the jurisdictions in which we operate, including guidance on risk related to forced labour and child labour.

We conduct ongoing screening of all suppliers, which allows us to baseline a supplier's risk profile and subsequently flag and assess any activities that would violate our Supplier Code of Conduct. We discuss any instances where corrective actions are required with the supplier and track these issues from beginning to completion. No instances were raised for review during the Reporting Period, and there were no forced labour or child labour incidents related to our suppliers identified through our supplier monitoring procedures.

To assess the effectiveness of our approach to forced labour and child labour risks, we consider input from relevant internal and external stakeholders, including investors, customers, civil society and community representatives.

9. Our consultation and governance process

In preparing this Annual Report, the Reporting Entities have engaged other entities it is affiliated with. They have also consulted with key areas of our organization to prepare this Annual Report, including Procurement, Human Resources, Legal and our external legal counsel. These teams operate across our enterprise, including across the Reporting Entities to which this Annual Report

applies. This consultation process has supported our enterprise-wide approach to forced labour and child labour.

10. Approval

This Annual Report was approved by the board of directors of each Reporting Entity on May 22, 2025.

Conclusion

Each Reporting Entity remains committed to preventing forced labour and child labour from taking place in our business and in our supply chains. We will continue to review our policies, procedures and practices periodically to determine any enhancements we can make to help prevent forced labour and child labour and any other forms of human rights abuse.

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11. 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 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.

Dated this 22th day of May, 2025.

**HARLEY-DAVIDSON CANADA LP. by its
general partner HARLEY-DAVIDSON
CANADA GP INC.**

Per:

Director

I have the authority to bind the limited
partnership and the corporation

HARLEY-DAVIDSON CANADA INC.

Per:

Director

I have the authority to bind the corporation

**HARLEY-DAVIDSON RETAIL CANADA
INC.**

Per:

Director

I have the authority to bind the corporation