



**Polaris Industries Inc. (Importing under BN 899453682 RM0001)**  
**Polaris Industries Ltd. (Importing under BN 121833024 RM0001)**  
**Polaris Industries Ltd. dba Teton Outfitters (Importing under BN 121833024 RM0002)**

## **Modern Slavery Statement**

**2023**

### **Reporting Year**

1. This joint modern slavery statement ("**Statement**") is submitted by Polaris Industries Inc. and Polaris Industries Ltd., also doing business as Teton Outfitters (collectively, "**Polaris**", "**we**", or "**our**") in accordance with section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") for the most recently completed fiscal year, which ended on December 31, 2023 (the "**Reporting Period**").
2. This Statement sets out the steps that we have taken and will be taking to verify that business practices that compromise fundamental human rights, such as forced labor, trafficking in persons and child labor ("**modern slavery**") are not taking place in our own business or in our supply chains.

### **Introduction**

3. We are committed to a program of continuous improvement in our business practices to combat modern slavery in our supply chains and in our business. It is our policy to conduct business ethically and in accordance with the Act, as amended from time to time.
4. We are committed to acting ethically in our business dealings and relationships wherever we operate and use effective systems to counter modern slavery practices. We will uphold the laws relevant to countering modern slavery in the jurisdictions in which we operate.

### **Structure, Business and Supply Chains**

5. Polaris Inc., a Delaware corporation, was formed in 1994. The terms "Polaris," the "Company," "we," "us," and "our" as used herein refer to the business and operations of Polaris Inc., its subsidiaries and its predecessors, which began doing business in 1954.
6. Polaris Inc. owns Polaris Industries Inc., which indirectly owns Polaris Industries Ltd., either sells or distributes goods in Canada, and imports into Canada goods produced outside of Canada, and will be covered collectively by this report.
7. Polaris is headquartered in Medina, Minnesota, USA. The Company employs approximately 18,000 employees and serves 90+ countries.
8. Polaris Industries Ltd. is principally located in Winnipeg, Manitoba, Canada, and during the Reporting Period, employed approximately 36 people.
9. For 70 years, Polaris has been making high-quality, breakthrough products as the global leader in powersports. We design, engineer, manufacture and market powersports vehicles which

include: off-road vehicles (“ORV”), including all terrain vehicles (“ATV”) and side-by-side vehicles; military and commercial ORVs; snowmobiles; motorcycles; motoroadsters; quadricycles; and boats. We also design and manufacture or source parts, garments and accessories (“PG&A”), which includes aftermarket accessories and apparel. Our products are sold online and through dealers and distributors principally located in the United States, Canada, Western Europe, Australia, and Mexico.

10. We operate in three core business segments; Off Road, On Road, and Marine. Our products are sold through a network of approximately 2,500 independent dealers in North America, approximately 1,500 independent international dealers through over 25 subsidiaries, and approximately 70 independent distributors in nearly 90 countries outside of North America. A majority of our dealers and distributors are multi-line and also carry competitor products, however some dealers carry our full line of products and, while relatively consistent, the actual number of dealers carrying our products can vary from time to time.
11. Polaris’s businesses:
  - (a) Off-Road Vehicles (ORV) and Snowmobiles;
  - (b) On-road and Motorcycles;
  - (c) Marine; and
  - (d) Part, Garments and Accessories
12. Polaris business activities include the importation, distribution, sales and marketing of Polaris vehicles and parts, garments and accessories, into Canada. We do not manufacture any of the Polaris products in Canada.
13. Polaris Industries Ltd. suppliers are Polaris Industries Inc. and its subsidiaries, which operate globally. In a small number of cases, parts and accessories are purchased from other local suppliers which are based in Canada.
14. We also engage other service providers who assist with our business operations including contractors, recruitment agencies and third party commercial real estate, cleaning and office services. These third parties are based in Canada.

#### **Risks of Modern Slavery**

15. The risks of modern slavery in our operations and supply chain in Canada are low. Our suppliers and service providers located in Canada are in an overall low modern slavery geographic risk.
16. We have identified general forced or child labor risks related to the types of products we source, produce, sell, distribute or import, and the raw materials or commodities used in our supply chain. Polaris has processes and controls (that are consistent with similarly situated companies) in our supply chain and business operations to identify and address modern slavery risks.

## Assessing and Addressing Modern Slavery Risks

### Our Policies on Modern Slavery

17. We have policies in place that mitigate the risk of modern slavery in our operations and supply chains.
18. Our employees are required to comply with the Polaris Code of Conduct (the “**Code**”), which is a global document issued by the Legal, Ethics and Compliance Department. The Code informs employees that if they encounter a situation that might have ethical implications, the employee has an obligation to alert someone immediately. This would include modern slavery violations. Under the Code, employees have multiple avenues to raise concerns, including: speaking with a manager or leader, contacting Human Resources, the Legal department, or the Global Head of Ethics and Compliance. Code Violations may result in disciplinary action.
19. Specific contact details are provided within the Code for:
  - (a) Sr. Director, Internal Audit;
  - (b) Chief Financial Officer;
  - (c) Chair of the Audit Committee;
  - (d) General Counsel; and
  - (e) Global Head of Ethics & Compliance.
20. In addition, employees can:
  - (a) Call the Polaris Business Ethics Hotline which is available 24 hours a day, 365 days a year. The Hotline is managed by an independent third-party provider (Ethicspoint) whose trained representatives will ask specific questions about the situation and submit a report to the compliance team. Each call is assigned a reference number so the employee can provide additional information or check on the status at any time; or
  - (b) Complete an Online Report by visiting our external, secure server managed by Ethicspoint. Employees can submit an online report by accessing the “Reporting Violations” link on our company intranet or [www.ethicspoint.com](http://www.ethicspoint.com). Employees complete a form that enables the compliance team to investigate and take appropriate actions; or
  - (c) Contact Polaris Human Resources.
21. If an employee reports in good faith a potential breach of the law or Code and if they cooperate in a company investigation, they are expressly protected against retaliation, harassment, or discrimination.
22. All of our suppliers are expected to adhere to our Supplier Code of Conduct and Human Rights Policy. Suppliers are also expected to complete a compliance survey twice a year and sign off on their commitment to these policies.
23. Respecting human rights in the workplace and across our global supply chain is important to Polaris. Our Human Rights Policy requires that Polaris and each supplier maintain a workplace free from harassment, discrimination, child labor, forced labor and any other forms of

compulsory labor. It also requires safeguards against human trafficking anywhere within our operations and supply chain. The Policy outlines our expectation that we and our suppliers comply with all applicable labor, wage and hour laws, as well as all applicable health, safety and environmental laws and regulations to provide a safe and healthy work environment.

24. Polaris is committed to respecting the privacy and rights of employees and third parties, and we require our suppliers to do the same. In the United States, we also require our suppliers of a certain size to develop an affirmative action plan in accordance with Polaris' commitment to diversity and inclusion.
25. We are not aware of any report either internally or to Ethicspoint during the Reporting Period relating to modern slavery. Additionally, we have not identified any instances of forced or child labor in our activities or supply chain and therefore have not taken any measures to remediate such forced or child labor or the loss of income that results from measures taken to eliminate the use of forced or child labor.

### **Assessing Effectiveness of Actions**

26. Confirming that modern slavery practices are not taking place in our business and supply chains is and will always be a work in progress since we will regularly conduct due diligence exercises and risk assessments of our suppliers in relation to modern slavery prevention practices. Where such exercises and assessments suggest a risk of modern slavery, we will request the relevant supplier to investigate and redress where necessary, and to update us accordingly. Where a supplier fails to satisfactorily redress a risk area, we may decide to cease using the supplier.

### Supplier Screening Process

27. We remain focused on maintaining our rigorous supply chain management processes. We built upon the compliance assessment we completed in 2022 around specific risk indicators, including due diligence reviews in partnership with Diligent (formerly Steele Compliance) to check our current known supplier list against third-party databases, screening for reputational and business risks.
28. Polaris Industries Inc. worked with Assent Compliance and Sayari to enhance our supplier screening and due diligence programs to uncover potential risks related to human trafficking, forced, and child labor. Additionally, for the majority of our cotton products imported by Polaris Industries Ltd. into Canada we perform traceability reviews and collect supporting documentation.
29. Partnering with external insight and expertise, Polaris worked with Assent to conduct surveys of its entire supply base in 2023 to collect data on their understanding of and compliance with Environmental, Social, and Governance (ESG) measures and protocols. These surveys covered topics ranging from bribery and corruption, labor rights, business continuity, environmental policies and health and safety, and responses are followed up with as needed to gain additional information.
30. When bringing on a new supplier, Polaris facilitates a thorough review of key metrics including manufacturing processes and finances during the onboarding process to check for any potential issues at the start of the relationship. In 2023, we refined this audit process based on previous learnings to help further our continuous improvement efforts.

### Mapping Supply Chain Activities

31. Polaris Industries Inc. partners with Sayari, because of its intuitive risk intelligence platform and collaboration with US Customs and Border Protection to support mitigation of ongoing global supply chain risks. Sayari's differentiated combination of global corporate ownership data with global trade flow data and counterparty relationships has unlocked new transparency for Polaris Industries Inc., at a time of increasing regulatory concern around the effectiveness of due diligence and trade controls.
32. Polaris Industries Inc. has leveraged the Sayari Graph to map its supply chain and identify beneficial owners and related companies that potentially employ forced labor. Utilizing the graphing tool, Polaris Industries Inc. has the ability to surface these indicators and proactively identify forced labor risks in the supply chain.
33. With the partnership of Sayari, we take a risk-based approach, screening and mapping direct suppliers located in China and the neighboring Asia Pacific region. To date, Polaris Industries Inc. has screened 400+ suppliers and has yet to uncover any actionable risk indicators.
34. We will monitor the effectiveness of our modern slavery practices and controls under the supervision of Vice President, Global Trade and the Corporate Legal and Ethics Team and the Global Head of Ethics and Compliance.

### **Future Actions**

35. In 2024, we intend to launch an updated supplier relations management tool that will centralize supplier onboarding, supplier profile management, supplier risk management, sourcing event management and contract lifecycle management in one platform, while also adding critical new capabilities to help us continue improving our processes and procedures.
36. We intend in the coming years to take the following steps in order to improve our modern slavery control framework:
  - (a) To review all relevant policies to confirm they address modern slavery issues in accordance with the Act; and
  - (b) To review our standard contracts and terms and conditions of purchase to confirm they address modern slavery in our supply chain.
37. We are committed to verifying that there are no modern slavery violations in our supply chains or in any part of our business operations.

### Due Diligence Processes for Modern Slavery Prevention

38. Within the coming financial years, we will review our due diligence exercises that are conducted in the process of selecting suppliers to cover the question of modern slavery, in order to assess how suppliers manage the risk of modern slavery in their operations and supply chains.

### Steps Taken to Assess and Manage Any Risks

39. We regularly assess the risk of modern slavery in our business and supply chains, determine steps necessary to manage that risk, and implement remediation actions as needed.

Training

- 40. In 2023, Polaris Industries Inc. required training for certain employees on how to identify and prevent business practices that can lead to forced labor in supply chains.
- 41. In furtherance of our commitment to compliance with laws that address modern slavery, we will work to continuously improve training for relevant employees.
- 42. The Directors named below received a briefing on modern slavery requirements of the Act prior to approving this Statement.

**Attestation and Approval**

This statement is made pursuant to the Act and has been approved by the Directors for Polaris Industries Inc. on 30 May 2024.

Signed on Behalf of the Directors of Polaris Industries Inc.

DocuSigned by:  
*Sarah Maveus*  
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Sarah M. Maveus  
VP Legal - Assistant Secretary and Total Rewards

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