



Mercedes-Benz Canada Inc.

Forced and Child Labour in Canadian Supply Chains Report

26 May 2026

Mercedes-Benz



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A message from our Directors



Mercedes-Benz Canada Inc. (“**MB Canada**”), a company incorporated under the Canada Business Corporations Act, is pleased to provide our annual Forced and Child Labour in Canadian Supply Chains Report (“**Statement**”) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“**Act**”).

MB Canada is part of the wider Mercedes-Benz Group of companies (“**Mercedes-Benz Group**”) and has locally incorporated and enacted global initiatives.

People are at the core of our business. Our aim is to ensure that their fundamental human rights are respected in our own business, as well as by our business partners and suppliers. To assist us in upholding these values and reducing the risk that forced labour and child labour is used at any stage in our supply chains, we set out our standards and expectations with our suppliers, including in our Integrity Code, Supplier Sustainability Standards, Responsible Sourcing Standards, and Supplier Agreements.

MB Canada is committed to continually improving and developing best practices in identifying, monitoring, managing, and reporting on forced labour and child labour in our operations and supply chains.



Susann Mayhead
Chief Executive Officer,
Mercedes-Benz Canada Inc.



Susan Sinclair
Vice President & Chief Financial Officer,
Mercedes-Benz Canada Inc.

Section 1

Introduction

This Statement covers MB Canada's activities over the financial year ending 31 December 2025 and has been prepared to comply with the requirements of the Act, in order to meet the mandatory criteria as outlined in the Act's Guidance for Reporting Entities, accessed March 2026.

The Mercedes-Benz Group is aware of its responsibility to uphold human rights and has policies and due diligence processes in place related to forced labour and child labour.

Comprehensive measures have been implemented to ensure production materials and services are procured worldwide in alignment with sustainability standards to ensure that responsible business practices are embedded into policies and management systems. Furthermore, experts from various specialist internal departments at a global level, such as Procurement and Supplier Quality, Compliance and Legal, work very closely together to support and progress this topic from a variety of perspectives.

We are focused on identifying and assessing adverse impacts in operations, supply chains and business relationships and we cease, prevent, and mitigate adverse impacts, track implementation and results, and communicate how such impacts are addressed. These strategies, both globally and locally, put us on the right path towards ensuring respect for human rights in our supply chains.

Overview of the Corporate Structure in Canada

MB Canada operates in the Canadian market and is responsible for the distribution, marketing and customer service of Mercedes-Benz, Mercedes-AMG, Mercedes-Maybach, all-electric vehicles from Mercedes-Benz, Mercedes-Benz Vans, as well as the wholesaling of parts.

Locally, MB Canada also operates alongside Mercedes-Benz Financial Services Canada Corporation (MBFSC). The ultimate parent company of these entities is Mercedes-Benz Group AG.

The Mercedes-Benz Group AG is the parent company of the Mercedes-Benz Group and has its registered office in Stuttgart, Germany. Effective February 1, 2022, Daimler AG changed its name to Mercedes-Benz Group AG. As well as Mercedes-Benz Group AG, the Mercedes-Benz Group is made up of all subsidiary companies over which the Mercedes-Benz Group AG can exert a direct or indirect controlling influence. The Mercedes-Benz Group AG determines the strategy of the Mercedes-Benz Group, is its controlling body and, as the Group parent company, is responsible for legal, regulatory and compliance functions worldwide. The Mercedes-Benz Group markets and sells vehicles and services in almost all countries of the world and has some 30 production sites in Europe, North and Latin America, Asia, and Africa.

Section 2

Definitions

For the purposes of this statement, the following definitions apply, which are consistent with the definitions in the Act.

child labour means labour or services provided or offered to be provided by persons under the age of 18 years and that:

- a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;
- c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
- d) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999. (*travail des enfants*)

forced labour means labour or service provided or offered to be provided by a person under circumstances that:

- a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or
- b) constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930. (*travail forcé*)

Section 3

Sustainable Business Strategy

MB Canada is committed to upholding respect for human rights; it is a central aspect of our sustainable business strategy. MB Canada endeavours to ensure these fundamental rights are respected and implements measures to address forced labour and child labour within our own business and throughout our supply chain.

Following a risk-based approach, MB Canada has taken the below measures in the previous financial year to prevent and reduce the risk that forced labour and/or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada.

- Mapping activities
- Mapping supply chains
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Developing and implementing an action plan for addressing forced labour and/or child labour
- Addressing practices in the organization's activities and supply chains that may cause or contribute to the risk of forced labour and/or child labour
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- Requiring suppliers to have policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- Developing and implementing child protection policies and processes
- Developing and implementing anti-forced labour and/or -child labour contractual clauses
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Auditing suppliers
- Monitoring suppliers
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
- Developing and implementing grievance mechanisms to address complaints in the workplace
- Developing and implementing training and awareness materials on forced labour and/or child labour
- Developing and implementing procedures to track effectiveness in addressing forced labour and/or child labour
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour

Global Risk Analysis

The Mercedes-Benz Group is exposed to different risks that are directly linked with the business activities of Mercedes-Benz Group AG and its subsidiaries or that result from external influences. The Mercedes-Benz Group Annual Report 2025¹ (“**Report**”) highlights the effective risk management system currently implemented to systematically and continually identify, assess, control, monitor and report emerging risks threatening the Mercedes-Benz Group and its sustainable business strategy. This approach is locally adopted by MB Canada.

One of the identified risks linked with the business activities and supply chain of the Mercedes-Benz Group AG is the use of forced labour and/or child labour. To the best of our knowledge, forced labour and/or child labour risks have been identified in relation to the following aspects of our business activities and supply chain:

- Sector/Industry related risk factors
- The product types produced or imported
- The locations of the Mercedes-Benz Group activities, operations, or factories
- The product types sourced
- The raw materials or commodities used in the supply chains
- Suppliers further down the supply chain than tier three
- The use of forced labour
- Tier one (direct) suppliers
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour
- The use of child labour

Furthermore, forced labour and/or child labour risks have been identified in relation to the following sectors and industries:

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Manufacturing
- Transportation and warehousing

MB Canada has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour and/or child labour in our activities and supply chains.

¹ Mercedes-Benz Group AG, Annual Report 2025, accessed March 2026, <https://group.mercedes-benz.com/documents/investors/reports/annual-report/mercedes-benz/mercedes-benz-annual-report-2025-incl-combined-management-report-mbg-ag.pdf>

Risk Mitigation Measures

The Mercedes-Benz Group's risk-based system to exercise human rights due diligence comprises of various initiatives and risk mitigation measures.

Respect for Human Rights

The Mercedes-Benz Group respects internationally recognized human rights and is committed to the following standards, among others:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights
- Ten principles of the UN Global Compact (UNGC)
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

These standards are included in the Mercedes-Benz Group's Integrity Code² and the Principles of Social Responsibility and Human Rights³, both of which are binding for all managers and employees of the Mercedes-Benz Group AG and the consolidated Group companies worldwide.

Integrity Code

The Mercedes-Benz Group-wide Integrity Code provides appropriate guidance, serving as a common standard of values, defining the guidelines for conduct, and helping employees make the right decisions. The Integrity Code is binding on all employees of Mercedes-Benz Group AG and all the Mercedes-Benz Group companies worldwide. It includes, among other things, regulations for preventing corruption, respecting human rights, handling data, and complying with technical product requirements.

The Integrity Code is summarized in five key corporate principles. They provide orientation and are to be actively applied by all employees:

- 1) The Mercedes-Benz Group strives to create sustainable value – economically, ecologically and socially
- 2) The Mercedes-Benz Group acts responsibly and respects the rules
- 3) The Mercedes-Benz Group addresses issues openly and stands for transparency
- 4) Fairness and respect provide the foundation of collaboration
- 5) The Mercedes-Benz Group practices diversity

Principles of Social Responsibility & Human Rights

The Principles of Social Responsibility and Human Rights is an expression of the Mercedes-Benz Group's commitment to ensuring that human rights are respected in all Group companies and by its partners along the supply chain. The policy statement describes the procedure for implementing human rights due diligence obligations and identifies the material human rights risks for the Mercedes-Benz Group.

² Mercedes-Benz Group AG, Integrity Code, accessed March 2026, <https://group.mercedes-benz.com/responsibility/compliance/integrity-code.html>

³ Mercedes-Benz Group AG, Principles of Social Responsibility and Human Rights, accessed March 2026, <https://group.mercedes-benz.com/responsibility/society/human-rights/principles-of-social-responsibility-and-human-rights.html>

With these principles, the Mercedes-Benz Group is committed to preventing and mitigating potential negative impacts on human rights within the scope of our business activities, and to minimizing or, where possible, ending actual negative impacts.

With input from all relevant specialist units of the Mercedes-Benz Group, in-house human rights experts, and external stakeholders, on a regular and ad-hoc basis, the Mercedes-Benz Group continues to develop and adapt the principles in accordance with the results of the risk assessment within the framework of the Human Rights Respect System (“HRRS”).

Requirements for Suppliers

The Mercedes-Benz Group is committed to responsible procurement of production and non-production materials and services. The Mercedes-Benz Group has defined guidelines for sustainable supply chain management in the Responsible Sourcing Standards (“RSS”)⁴. These RSS apply globally, are addressed to all Mercedes-Benz Group Partners and an integral part of individual supply contracts. In scope is the Protection of Human Rights, including:

- protecting children from economic and social exploitation,
- ban on forced labour and slavery,
- freedom of association and right to collective bargaining,
- non-discrimination and equal opportunities,
- health and safety at work,
- fair working conditions (remuneration and working hours),
- use of public and private security personnel,
- protection of human rights defenders and environmental activists,
- protection of local communities and indigenous peoples and,
- responsible sourcing of raw materials, particularly from conflict-affected and high-risk areas.

As the basis for the responsible procurement of materials and services, the aim of the RSS is to prevent, minimize or, as far as possible, eliminate negative impacts on people and the environment worldwide.

Human Rights Respect System (“HRRS”)⁵

The HRRS is the human rights due diligence approach of the Mercedes-Benz Group. It provides protection of the Mercedes-Benz Group’s own employees through the Group-wide Social Compliance Management System (“**Social CMS**”), as well as processes for human rights due diligence in supply chains as part of Supplier Compliance Risk Management – Human Rights (“**SCRM**”) for direct suppliers and, on a risk basis, indirect suppliers (beyond Tier 1).

The HRRS is a cycle that consists of four steps:

- 1) Risk assessment
- 2) Program implementation
- 3) Monitoring
- 4) Reporting

⁴ Mercedes-Benz Group AG, Responsible Sourcing Standards, accessed March 2026, <https://supplier.mercedes-benz.com/docs/DOC-2672>

⁵ Mercedes-Benz Group AG, Human Rights Respect System, accessed March 2026, <https://group.mercedes-benz.com/responsibility/society/human-rights/human-rights-respect-system.html>

It is designed to systematically identify risks, as well as potential and actual adverse impacts of business operations on the upholding of human rights at an early stage, to prevent them and to initiate countermeasures, if required.

In the implementation and further development of the HRSS, the Mercedes-Benz Group consults with experts, employees, and other stakeholders who may be affected by Mercedes-Benz economic activities concerning its human rights principles.

Social Compliance Management System (“Social CMS”)

With the Social CMS⁶, the Mercedes-Benz Group has integrated the topic of human rights for the Mercedes-Benz Group companies into the Group-wide, systematic compliance risk management process.

Each Group company is assigned to a risk category based on this assessment. Following this abstract risk assessment, the specific human rights risks are identified and evaluated in direct consultation with the responsible compliance units.

The results of the risk assessment form the basis for deriving and allocating risk-specific preventive measures. Additionally, general preventive measures for employees in the Group companies are implemented within our own business operations.

These include, among others:

- Communication and implementation of our Integrity Code and these Principles
- Training to raise awareness of human rights and to implement human rights due diligence
- Monitoring of the Group companies regarding the implementation of risk-specific preventive measures within the framework of the Social CMS

The responsibility for implementing the measures lies with the respective Group companies. In the event of actual negative impacts in the Group companies, appropriate remedial measures are promptly taken.

Supplier Compliance Risk Management – Human Rights (“SCRM”)

As part of Supplier Compliance Risk Management – Human Rights (“SCRM”)⁷, the Mercedes-Benz Group subjects all the Tier 1 suppliers of its procurement units for production materials as well as for non-production materials and services to a risk assessment at least once a year.

Following an initial overarching risk assessment, the specific risks are determined using specific questionnaires. In addition, the procurement departments continuously check production materials as well as non-production materials and services for all Tier 1 suppliers for both human rights and environmental risks using artificial intelligence.

The Mercedes-Benz Group follows up on all internal and external reports of potential human rights violations from Tier 1 suppliers and substantiated knowledge from Tier N suppliers in accordance with the SCRM – Human Rights.

Identification of Risk Raw Materials and Services

In order to examine further risks in procurement that go beyond Tier-1-suppliers, the Mercedes-Benz Group first analysed the raw materials present in a Mercedes-Benz vehicle and prioritized them based on various factors. The methodology provides for raw materials to be evaluated and prioritized based on country risk, the criticality of the raw material and internal expert assessments. External data sources are used for the evaluation, e.g. RMI’s Global Risk Map. The Group plans to gradually examine the 24 critical raw materials identified in more detail targeted for the year 2028 and define appropriate actions.

⁶ Mercedes-Benz Group AG, Social CMS, accessed March 2026, <https://group.mercedes-benz.com/sustainability/human-rights/>

⁷ Mercedes-Benz Supplier Portal, accessed March 2026, <https://supplier.mercedes-benz.com/portal/en>

This review consists of three steps:

1. Increase transparency along the raw material supply chains – especially for certain components, such as the battery cell. To this end, Mercedes-Benz Group contacts among others the suppliers of the relevant components and asks them to disclose their supplier structure in a self-disclosure.
2. Identify risk hotspots in the raw material supply chains – for example, based on country risks.
3. Define and implement actions for risk hotspots and check whether they are effective over the long term.

When assessing risks, the Mercedes-Benz Group is guided by the severity approach of the UN Guiding Principles, among other things. The Group first assesses which human rights risks generally occur in connection with a specific raw material. The severity of the risk and the number of people affected are then assessed. In a further step, the Mercedes-Benz Group uses supplier dialogues, supplier self-disclosures and audits to assess whether the risk also occurs in its own production material supply chain. If this is the case, the Mercedes-Benz Group defines suitable actions to minimize the relevant human rights risks. When selecting actions, the principle of not categorically excluding high-risk areas as sources of critical raw materials is followed. The Mercedes-Benz Group follows the principle of “Empowerment before withdrawal”.

The ambition is to improve the local situation for the people and to strengthen their rights and protect the environment. In the reporting year, the Mercedes-Benz Group was able to complete 72% of the process for reviewing all 24 critical raw materials (2024: 65%), thereby achieving its target for the year 2025. The target achievement describes the progress in the process for reviewing all 24 raw materials, including fully completed and partially completed assessments. During the reporting period, it completed the review of leather. The identified risk areas include child labour, inadequate occupational health and safety, environmental risks related to human rights and forced labour. During the reporting period, the Mercedes-Benz Group recorded progress with respect to the 24 critical raw materials still subject to final assessments: it has collected important data that is necessary for the review – on deposits, production volumes, mining and processing of the raw materials, as well as on trade in them.

Grievance Mechanism

Complaints Management – The Business & People Protection Office (“BPO”)

The Whistleblower System BPO⁸ enables employees and external whistleblowers worldwide to report legal and rule violations. By reporting to the Whistleblower System BPO, the Mercedes-Benz Group is made aware of possible risks. This allows it to avert damage to the Group, its employees and third parties, as well as protect people harmed by misconduct.

With regard to the supply chains, complainants’ non-compliance with the Responsible Sourcing Standards (“RSS”) can also be reported via the BPO. Insofar as the misconduct or grievance lies within the supplier’s sphere of responsibility, the supplier is instructed to remedy it immediately. The supplier is furthermore obligated to make known the available opportunities to lodge a complaint within its supply chain. In addition, it must ensure that the information is also passed on to the deeper supply chain.

⁸ Mercedes-Benz Group AG, BPO, accessed March 2026, <https://group.mercedes-benz.com/responsibility/compliance/bpo/>

Concurrently, the Mercedes-Benz Group requires its suppliers to establish an equivalent complaint format for their own supply chains. In doing so, they are to work towards incorporating similar reporting obligations in contracts with their sub-suppliers in order that relevant information and reports of violations are shared by the sub-suppliers.

Training on the Topic of Human Rights

Training for All Employees of the Mercedes-Benz Group and Mercedes-Benz Canada

Employees receive training courses on compliance topics tailored to their specific tasks and roles.

For example, administrative employees (full- and part-time) of the Mercedes-Benz Group AG and consolidated companies have access to a web-based, target-group specific training programme. This includes a mandatory basic training that covers integrity as well as compliance topics such as corruption prevention. This training is assigned to all administrative employees, including members of the Board of Management. In addition, there are specific modules for managers and modules on particular compliance topics. The respective modules are automatically assigned to employees upon hiring, promotion, or transfer to a specific role. Employees are required to complete the web-based training programme regularly every three years; participation is voluntary for employees in production and production related operations.

The Integrity Code and the Declaration of Principles for Social Responsibility and Human Rights are binding for all employees of the Mercedes-Benz Group as well as the consolidated Group companies and are therefore an integral part of its training concepts.

Training for Management of the Mercedes-Benz Group and Mercedes-Benz Canada

In 2023, human rights compliance training was also introduced for all managers worldwide to familiarize them with the requirements of human rights due diligence in line with their role.

Training for Employees in Procurement

Mercedes-Benz AG gives specific training to its employees in Procurement: corresponding sustainability training courses were also held in the reporting year. Employees of the Mercedes-Benz AG procurement unit for production materials were trained in the key requirements that suppliers must accept when awarding contracts.

The Mercedes-Benz Group's procurement unit for non-production materials and services also organised further training sessions in the reporting year. The training courses focused on the requirements of the German Supply Chain Due Diligence Act.

Compliance Awareness Module ("CAM")

Based on its sustainability standards for suppliers and its Integrity Code, the Mercedes-Benz Group has also developed the Compliance Awareness Module ("CAM")⁹. This publicly available training module helps suppliers to handle possible integrity and compliance-related risks in a responsible manner. All suppliers can access the module via the Supplier Portal at any time.

⁹ Mercedes-Benz Group AG, Compliance Awareness Module (CAM), accessed March 2026, <https://www.compliance-awareness-module.com/>

Section 4

Assessing the Effectiveness of Measures Taken

MB Canada and the Mercedes-Benz Group are taking a multifaceted approach to mitigating the risks of forced labour and child labour within our supply chains. There are currently no agreed units of measurement or international standards to measure the efficacy of our approach effectively and credibly, the UN Guiding Principles on Business and Human Rights states that the efficacy of such an approach should:

- a) be based on qualitative and quantitative indicators, and
- b) draw on feedback from both internal and external sources, including affected stakeholders.

Alongside the aforementioned risk mitigation measures, below are additional methods of assessing the effectiveness of measures taken to mitigate the risk of forced labour and child labour in the Mercedes-Benz Group and MB Canada supply chains.

Corporate Audit

Mercedes-Benz Corporate Audit regularly conducts audits in various Mercedes-Benz entities worldwide. Corporate Audit works in accordance with the professional standards and the code of ethics of the Institute of Internal Auditors (“**IIA**”). Accordingly, the audits of Corporate Audit also take integrity aspects into account.

The Compliance Management System (“**CMS**”)

The Compliance Management System (“**CMS**”)¹⁰ at Mercedes-Benz Group AG consists of basic principles and measures that promote compliant behaviour. It is based on national and international standards and is applied on a global scale in the Mercedes-Benz Group. The CMS consists of seven elements that build on one another: compliance values, compliance objectives, compliance organization, compliance risks, compliance program, communication and training and monitoring and improvement.

The Mercedes-Benz Group monitors the processes and measures of the CMS annually and performs analyses to establish whether these measures are appropriate and effective. To this end, it draws on information from the Mercedes-Benz Group companies and other locally collected information. It also monitors its processes using performance indicators. To determine this, the Mercedes-Benz Group checks, among other things, compliance with formal requirements and the completeness of the content. In doing so, the Mercedes-Benz Group also takes into account the findings from internal audits as well as independent external audits.

Where necessary owing to new legal requirements or findings from risk analyses, the Mercedes-Benz Group adapts the CMS. The Mercedes-Benz Group companies are required to implement the resulting improvement measures. In addition, the effectiveness of the measures is regularly reviewed, and the responsible management bodies are informed of the monitoring results.

¹⁰ Mercedes-Benz Group AG, Compliance Management System, accessed March 2026, <https://group.mercedes-benz.com/responsibility/compliance/compliance-management-system.html>

Section 5

Process of Consultation with Affiliate and Holding Entities in Preparing the Statement

MB Canada has consulted with representatives from Mercedes-Benz Group in preparing this statement.

MB Canada and Mercedes-Benz Group recognize the need for a coordinated approach to addressing the risk of forced labour and child labour in its distinct and shared work force and supply chains.

Section 6

Attestation for Mercedes-Benz Canada Inc. Reporting year 2025

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 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.

Per: *Susann Mayhead*

Signed by: Susann Mayhead
E-Mail: susann.mayhead@mercedes-benz.com
Signing time: 28-05-2026 09:27:41 (-04:00)
IP address: 163.116.130.114

Susann Mayhead Chief Executive Officer, Mercedes-Benz Canada Inc.
May 26, 2026

Per: *Susan Sinclair*

Signed by: Susan Sinclair
E-Mail: susan.sinclair@mercedes-benz.com
Signing time: 26-05-2026 15:06:14 (-04:00)
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Susan Sinclair Vice President & Chief Financial Officer, Mercedes-Benz Canada Inc.
May 26, 2026

We have the authority to bind Mercedes-Benz Canada Inc.



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