

Child and Forced Labour Policy

High Strength Plates & Profiles Inc. ("HSPP") prohibits the use, directly or indirectly, of child labour or forced labour in its operations, and the use or supply of goods mined, manufactured or produced wholly or in part by forced labour or child labour. HSPP requires the same from its suppliers and contractors. The purpose of this policy is to outline the scope of that prohibition.

Definitions

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), the following definitions apply:

"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.

"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.

Prohibition

HSPP prohibits the use, directly or indirectly, of child labour and forced labour in its operations, including the use or supply of goods mined, manufactured or produced wholly or in part by forced labour or child labour.

HSPP requires its suppliers and contractors not to use, directly or indirectly, child labour or forced labour in their operations, and not to use or supply goods mined, manufactured or produced wholly or in part by forced labour and/or child labour.



Condition of Supply

It is a fundamental condition of HSPP's purchase orders and contracts that suppliers and contractors comply with the requirements of this policy.

Suppliers and contractors are advised that the following provision applies to all HSPP purchase orders and contracts:

HSPP requires its suppliers and contractors to comply with HSPP's Child and Forced Labour Policy as a fundamental condition of all purchase orders and contracts. A contravention of this policy is a fundamental breach of contract that may result in the termination of any outstanding purchase orders and/or contracts without liability to HSPP. HSPP's Child and Forced Labour Policy is available on request and on our website.

Non-Compliance

If HSPP determines that non-compliance with this policy has occurred, HSPP will notify the applicable supplier or contractor, and the supplier or contractor must immediately remedy the violation. If HSPP determines that the supplier or contractor has not remedied the violation, HSPP may terminate the applicable purchase order or contract on the basis that a fundamental breach of contract has occurred.



May 6, 2024

High Strength Plates and Profiles Inc. (hereinafter referred to “HSPP”), business number 893082297RC0001 is reporting for the year 2023 on their Forced Labour in Canadian Supply Chains. HSPP is a Canadian business with at least \$20 million in assets for at least one of its two most recent financial years, and has generated at least \$40 million in revenue for at least one of its two most recent financial years.

HSPP is in the manufacturing sector of Ontario, Canada, and have conducted an internal risk assessment of their major vendors and suppliers. HSPP requires all their vendors and suppliers have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains. HSPP’s own policies on forced labour and/or child labour, as well as their code of conduct is posted on their website www.highstrengthplates.com.

At the time of this report, HSPP has not identified any parts of its activities and supply chains that carry a risk of forced labour or child labour.

Training is mandatory for a select group of employees at HSPP. The training includes reading and understanding our forced labour or child labour policy.

Each year, HSPP will review their internal risk assessment, and add or remove vendors and suppliers who they deem to be a major vendor or supplier.

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