

**Posner Metals Limited**

610 Beach Road, Hamilton, ON L8H 3L1

Tel# 905-544-1881; Fax# 905-549-6044



**The Supply Chains Act Report 2023-2024**

**Introduction**

Forced labour can be found in every country and every sector. The International Labour Organization estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through the global supply chains of businesses. There is a risk that goods imported and distributed in Canada were produced with forced labour or child labour. Entities and government institutions doing business in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

The measures introduced in the *Supply Chains Act* aim to increase industry awareness and transparency and drive businesses to improve practices.

2311178 Ontario Inc. is defined as an "entity" under the *Supply Chains Act* and, therefore, must submit an annual report to the Minister of Public Safety by May 31 of each year. Reports must detail the steps taken during the previous financial year to prevent and reduce the risk that forced labour or child labour is used by 2311178 Ontario Inc. in its supply chains.

The following information uses the Minister's online questionnaire as the template for the report.

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#	Question	Response
1	This report is for...	An entity
2	Legal name	2311178 Ontario Inc.
3	Financial reporting year	01/01/2023 to 12/31/2023
4	Is this a revised version?	No
5	Business number	83425 7487
6	Is this a joint report?	No
7	Is the entity subject to reporting in another jurisdiction?	No
8	Which categorizations apply to the entity?	<p>Canadian business presence:</p> <ul style="list-style-type: none"> <li>• Has a place of business in Canada</li> <li>• Does business in Canada</li> <li>• Has assets in Canada</li> </ul> <p>Meets size-related thresholds:</p> <ul style="list-style-type: none"> <li>• Has at least \$20 million in assets for at least one of its two most recent financial years</li> <li>• Has generated at least \$40 million in revenue for at least one of its two most recent financial years</li> </ul>
9	Which sectors or industries does the entity operate in?	Other – Recyclable metal merchant wholesaler
10	In which country is the entity headquartered or principally located?	Canada
10.1	In which province or territory is the entity headquartered or principally located?	Ontario
11	What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity?	Other – The company sources goods strictly from the United States and Canada. Each country has existing laws and regulations that prohibit the use of forced and child labour. Therefore, the Company asserts that the risk of forced, or child labour is virtually non-existent within its supply chain.
12	Which of the following accurately describes the entity's structure?	Corporation
12.1	Which of the following accurately describes the entity's activities?	Controlling an entity engaged in producing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada.
13	Has the organization identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?	Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

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14	Does the organization currently have policies and due diligence processes in place related to forced labour and/or child labour	Yes, <ul style="list-style-type: none"><li>• Embedding responsible business conduct into policies and management systems</li></ul>
14.1	Has the organization identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains?	No such risks exist.
14.2	Has the organization identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries?	No such risks exist related to the entity's activities or supply chains.
15	Has the organization taken any measures to remediate any forced labour or child labour in its activities and supply chains?	Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.
16	Has the organization taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?	Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.
17	Does the organization currently provide training to employees on forced labour and/or child labour?	No
18	Does the organization currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?	No

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**Attestation:**

This report has been approved by the director of 2311178 Ontario Inc. on May 29, 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 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.

X

A handwritten signature in black ink, appearing to read "Michael Kam", is written over a horizontal line. The signature is stylized and extends upwards and to the right.

Michael Kam  
Director