

Fighting Against Forced Labour and Child Labour in Supply Chains Act (Supply Chains Act)

2024 Annual Report

Purpose

This report has been developed as a response to the reporting obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Supply Chains Act).

Reporting under the Supply Chains Act is an annual exercise that requires companies whose activities include producing, purchasing or distributing goods in Canada or elsewhere to publish a report on or before May 31 of each year.

The purpose of the legislation is to contribute to the implementation of Canada's international commitment to fight against forced labour and child labour through the imposition of reporting obligations.

506165 Ontario Limited (operating as Trillium Metal Stampings) is subject to reporting requirements of the *Supply Chains Act* and therefore must report on steps taken during its previous calendar year to prevent and reduce the risk that forced labour or child labour was used at any step of the production of goods produced, purchased or distributed by the entity.

Scope

The 2024 report covers the steps Trillium has taken during 2023. This report reflects the measures undertaken by Trillium only, not its customers or suppliers. Trillium's customers/suppliers are responsible for developing and submitting their respective reports.

Given that the Supply Chains Act came into force on January 1, 2024, Trillium's ability to collect detailed information on risks of forced labour and child labour in supply chains for goods purchased during the reporting period, as well as on measures to address those risks, was limited. The information presented in this report is not comprehensive but is intended to provide a high-level overview of the measures taken by Trillium with the intention of providing more detailed information in future reports.

Structure, activities and supply chains

Company Overview

Trillium is a manufacturer of metal stampings, weld assemblies and electro/mechanical assemblies. The company is privately owned and is located in Kitchener, Ontario. Trillium employs approximately 80 employees.

Supply Chain

Our primary supply chain is the purchase of steel from steel processing companies. The steel is purchased primarily from Canadian companies (95%) and some American companies (5%). In addition to steel, Trillium purchases components for assemblies. Approximately 95% are purchased from Canadian companies and 5% from American suppliers,

Trillium will work to map out its supply chain in more detail in the upcoming years.

Policies and Due Diligence

Trillium maintains workplace policies to help ensure there is no forced or child labour in its own workforce. This includes only hiring employees consistent with the Ontario Employment Standards Act. Trillium has also developed our *Ethical Recruitment, Freedom of Association, and Forced Labour Policy*.

Trillium will initiate a supplier code of conduct in the upcoming year. Trillium will investigate options for due diligence in the upcoming year.

Risk of Forced Labour

Trillium has not identified any forced labour or child labour in its activities or supply chains. As such, it has not taken any remediation measures. Trillium will continue to assess risk as we map our supply chain in the upcoming years.

Remediation Measures

Trillium has not and would not knowingly engage with any supplier who is in violation of fundamental human rights. The company has not taken any remediation measures at this time.

Training

Employees at Trillium will receive training in 2024.

Assessing Effectiveness

The Company does not have policies in place to assess the effectiveness. Although not yet in place, Trillium is committed to exploring mechanisms to assess effectiveness, which will further inform prevention measures to address risks of forced and child labour in our supply chains.

Approval and Attestation

In accordance with the requirements of the Act, pursuant to paragraph (4)(a), I attest that I have reviewed the information contained in the report for 506165 Ontario Limited (o/a Trillium Metal Stampings). 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 2023.

Sarah Tebbutt

Chief Executive Officer

May 31, 2024



I have authority to bind 506165 Ontario Limited.