



## Report under S-211: Addressing Forced Labour in Supply Chains

### 1. Introduction

This report constitutes the second modern slavery report for Alliance Steel Corporation for the fiscal year ended September 30, 2023. The objective of this report is to outline our efforts in identifying, addressing, and mitigating risks associated with forced labour and child labour within our supply chains.

### 2. Structure, Activities, and Supply Chains

Alliance Steel Corporation is a privately owned Quebec corporation with one location which is at 1060, boul. des Laurentides, Laval (Québec, Canada) H7G 2W1. Alliance Steel Corporation is a metals service center specializing in the processing and distribution of flat roller carbon steel, Aluminum and stainless steel coils, sheets and plates which we then sell primarily to the Quebec and Ontario markets. Our customers are predominantly manufacturers that operates across various sectors including but not limited to HVAC, transportation and construction. This involves selling large quantities of carbon steel, Aluminum and stainless steel that are custom cut to customer specification.

Our supply chain differs according to the type of metal. Steel is produced by Canadian mills in Ontario and is therefore purchased mostly domestically. Aluminum and stainless steel, which are not produced in Canada, are imported by us from the USA or purchased by us from import brokers that import primarily from Asia.

### 3. Policies and Procedures

As of the reporting period, Alliance Steel Corporation does not have specific policies directly addressing forced labour and child labour. However, we have initiated steps to develop and implement policies which will directly address forced labour and child labour.

- **Due Diligence Processes:** We have a centralized supplier approval process to ensure all new suppliers adhere to our standards. We do business with reputable companies or with individuals that we dealt with or known for many years. This process will involve assessments against our Supplier Certification Statement.

- **Supplier certification:** We are requesting our top suppliers to provide a *Supplier Certificate Statement* regarding forced and child labour, which includes the following compliance points:

- a) **Modern Slavery and Child Labour Policy:** Suppliers must agree to comply with the terms and conditions of the *Supplier Certificate Statement* or establish formal policies explicitly addressing modern slavery and human trafficking.

- b) **Communication:** Effective communication of policies and information on forced and child labour to their supply chain.
- c) **Supply Chain Due Diligence:** Processes for identifying, assessing, mitigating and attempting to eliminate risks of forced and child labour.
- d) **Compliance with Legislation:** Adherence to relevant forced labour and child labour legislation and regulations.
- e) **Continuous Improvement:** Ongoing monitoring and enhancement of efforts to combat forced and child labour. The *Supplier Certificate Statement* can be accessed on demand.

#### 4. Risk Assessment

We do business with reputable companies and/or individuals that we have known for many years. Metal material which we purchase has traceability and can be reviewed for adherence to regulations. We conduct internal assessments and engage in dialogue with our suppliers to evaluate and address potential risks. However, we do not identified all risks within our supply chain.

#### 5. Actions to be Taken

To date, no instances of forced or child labour have been reported within our supply chains. There has been no identification of loss of income for vulnerable families resulting from measures taken to eliminate forced and child labour. However, recognizing that there may be potential risks, we shall take the following proactive measures:

- a) **Enhanced Supplier Screening:** Implement screening processes for major current and new suppliers, such as the *Supplier Certificate Statement*.
- b) **Risk Assessment Tools:** Develop and implement a risk assessment procedure to identify, mitigate and attempt to eliminate risks in the supply chain, including geographic specific risk factors.
- c) **Ethical Sourcing Policies:** Update and enforce strict ethical sourcing policies that clearly outline expectations and consequences for non-compliance with labour standards, such as specified in the *Supplier Certificate Statement*.
- d) **Zero-Tolerance Policy:** Implement a zero-tolerance policy for forced labour and child labour, with clear consequences for violations, including termination of contracts, such as specified in the *Supplier Certificate Statement*.

#### 6. Training

We intend to implement an awareness and prevention of forced and child labour training program for key employees.

## 7. Monitoring and Effectiveness

Periodic reviews shall be done to monitor the effectiveness of the policies and procedures to be implemented to ensure compliance with established standards.

### Approval and Attestation

In compliance with the requirements of the Act, specifically section 11, I hereby attest that I have thoroughly reviewed the information contained in this report. Exercising reasonable diligence, I confirm that the information presented is true, accurate, and complete in all material respects for the purposes of the Act for the reporting year specified above. I have the authority to bind Alliance Steel Corporation.

We reserve the right to amend this report upon receipt of additional information.

**Full Name:** Glenda Susser

**Title:** President

**Date:** July 31, 2024

**Signature:** **GLENDASUSSER**  
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