

## PinAcle Stainless Steel Child Labor Principles

PinAcle Stainless Steel is a distributor of stainless-steel pipe and fittings. We import products from all over the world to the ASTM and ASME standards from- USA, Spain, France, India, Taiwan, China, Malaysia, Korea.

PinAcle Stainless Steel will contact all suppliers who have supplied product in 2023. Suppliers will be contacted in a tiered level based on the amount purchase orders issued to provide a response to the questionnaire below. All responses will be reviewed and kept on file. In the event there is cause for concern PinAcle management will have a meeting to address the concern with the supplier. Any open purchase orders will be canceled.

PinAcle Stainless Steel

- will not tolerate the use of Child and Forced Labour from our suppliers and sub-suppliers. For the purpose of this document, a "Child" is anyone who is less than 15 years of age.
- will not purchase or use any products, goods, services or raw materials anywhere in the world made or provided by a supplier who knowingly uses forced or involuntary prison labor.

In accordance with our principles, younger persons, as described above, may be employed under certain conditions. This employment should be documented and reviewed annually by local management under the following guidelines:

1. The employment is a temporary internship, apprenticeship, or is a seasonal common and customary practice in the industry;
2. The employment does not interfere with compulsory schooling;
3. The young person is working with the permission of his or her parent or legal guardian;
4. The employment does not violate any pertinent labor law or regulation;
5. The employment will be directly supervised;
6. The young person's safety, health and morals will be a primary concern.

An email will be sent to all suppliers to complete and confirm that they do not use any illegal child or forced labour in their manufacturing plants. They will also be asked to confirm with their raw material suppliers.

**Montréal**

4665 Rue Cousens  
St. Laurent, Québec  
H4S 1X5  
Tel: (514) 745-0360  
Fax: (514) 745-0387

**Edmonton**

5303 42nd Street NW  
Edmonton, Alberta  
T6B 3P2  
Tel: (780) 440-2811  
Fax: (780) 465-8937

**Moncton**

484 Boul. Adélarde-Savoie  
Dieppe, New Brunswick  
E1A 7T4  
Tel.: (888) 384-3875  
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**Saskatoon**

3603 Millar Avenue,  
Saskatoon, SK  
S7P 0B2  
Tel: (877)-664-2811  
Fax: (306)-374-8937

## Illegal use of Child Labor and Forced Labor

"[Supplier] hereby certifies that it is fully aware of the **Illegal use of Child and Forced Labor** regarding the employment of children under 15 years of age pursuant to PinAcle's Child Labour Principles and on the use of involuntary labor, human trafficked or slave labor pursuant to the PinAcle Forced Labor Principles (hereinafter referred to collectively as "PinAcle Principles").

[Supplier] certifies that it does not currently employ, and will not in the future employ, directly or indirectly, or through any sub-Supplier, any child to perform work for who is under 15 years of age, or 18 years of age in the case of hazardous work, in any of its operations or activities in a manner contravening PinAcle Principles or in violation of relevant laws and regulations.

[Supplier] certifies that it, and its suppliers of goods and services, will not utilize persons under the age of 15, or 18 years of age for hazardous work, in contravention of the PinAcle Principles or in violation of relevant laws and regulations.

[Supplier] certifies that the workers it uses, and will use, to produce and supply the goods offered are in all cases present voluntarily.

[Supplier] understands that this is essential to all purchase orders. [Supplier] also agrees that, in the event that PinAcle determines that a violation or contravention of relevant laws or regulations or the PinAcle Principles has occurred, PinAcle shall notify [Supplier] and [Supplier] shall immediately remedy the violation or contravention. In the event that PinAcle determines that [Supplier] has not remedied the violation or contravention and complied with the law and/or the PinAcle Principles, then PinAcle may terminate this purchase order immediately, and such termination shall be with cause."

PinAcle Stainless Steel reserved the right of access to perform a site audit at any of our suppliers and their sub-supplier to ensure that our they are in conformance to the **Illegal use of Child and Forced Labor laws**

### Employee Training

This policy will be posted in all locations to make employees aware of the PinAcle Stainless Steel Child Labor Principles. Any employee who wishes to learn more can talk ask questions to management. PinAcle has an open-door policy to discuss this policy or any others.

**Rob Davidson**

Quality Manager

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