

Report: Forced Labour in Canadian Supply Chains

Bill S-211 or Fighting Against Forced Labour and Child Labour in Supply Chains Act

Effective Date: January 1, 2024

Reporting Entity:	Crawford Metal Corporation/Corporation Acier Crawford
Reporting Year:	January 1, 2023 to December 31, 2023
Report Version:	1
Joint Report Including:	Crawford Acquisitions Corporation
Entity Type:	Corporation
Sector/Industry:	Wholesale Trade, Steel Industry
Location:	Ontario, Canada
Reporting Required in Other Jurisdictions:	None required



Crawford Metal Corporation

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Report: Forced Labour in Canadian Supply Chains

Structure, activities and supply chains

Crawford Metal Corporation, hereafter referred to as “Crawford Metal” or “the Company”, is a Corporation incorporated in Ontario, Canada which is engaged in Wholesale Trade activities in the Steel Industry. The Company purchases finished goods steel products from third party suppliers, some of which are produced outside of and imported into Canada. The Company distributes and sells the finished goods steel primarily in Ontario and Quebec.

Crawford Metal is not listed on a stock exchange in Canada. It has a business presence in Canada by virtue of: 1. having a place of business in Canada; 2. doing business in Canada; and 3. having assets in Canada. In 2023, Crawford Metal met the size-related threshold for reporting under Bill S-211.

Crawford Acquisitions Corporation, the holding company that wholly owns Crawford Metal, meets the same business presence and size-related reporting thresholds as Crawford Metal.

Policies and due diligence processes

Regarding the steps taken by Crawford Metal and Crawford Acquisitions Corp. in the reporting period to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity, the Company considers the following three components of its supply chain:

Upstream: Suppliers

The Company only purchases from reputable suppliers with whom it has a long history of conducting business. As it has commenced its review activities, the Company has identified that many of these suppliers have existing, publicly available Codes of Conduct in place pertaining to this matter.

Direct Control

Crawford Metal only hires adult employees with valid and qualifying Social Insurance Numbers (SINs). All of the Company’s employees earn more than minimum wage.

Upstream: Customers

Crawford Metal only sells goods to reputable, legitimate Canadian businesses. Forced and child labour is illegal in Canada, therefore the Company relies on the enforcement mechanisms present in the Canadian jurisdiction to further strengthen its own due diligence efforts.

At this time, no written policy or formal procedures are in place regarding the matter of forced labour and Child labour in the Company’s supply chain, but this is something the joint entities will be looking at and working on in the near term.

Forced labour and child labour risks

The Company recognizes that steel industry is at risk for forced labor and child labor at various stages in its supply chain. The complexity and global nature of the steel supply chain increase the likelihood of these labor issues, particularly in the upstream stages involving raw material extraction and initial processing. However, at this time, the Company has not identified any instances of forced labour or child labour in its own activities or in its supply chain.

Remediation measures

At this time, because the Company has not identified any instances of forced labour or child labour in its own activities or in its supply chain, there are no active remediation measures in progress.

Remediation of loss of income

At this time, the Company has not identified any instances of loss of income to vulnerable families resulting from forced labour or child labour within its supply chain, therefore, there are currently no remediation measures in progress. In the event such instances were identified, the Company would investigate and initiate the appropriate measures to be taken on a go forward basis.

Training

At this time, the Company does not provide training to employees on forced labour and child labour. As it undertakes additional due diligence to identify and remediate such activities going forward, the Company will also be undertaking efforts to educate its employees accordingly.

Assessing effectiveness

Given the timeline in which the Act took effect and the deadline for the Company's first report of this nature, no further information is available at this time. On a go forward basis, the Company will be increasing its focus in the areas of forced labor and child labor at various stages in its supply chain, including remediation and internal training opportunities. These assessment and planning activities will be conducted by following the guidance of the Act, and may include activities such as:

- Creating a roadmap and timeline for increased compliance with the Act
- Conducting supply chain mapping activities
- Developing written policies and procedures to formalize current practices to ensure no forced or child labour is present within the Company's direct control
- Engaging with supply chain partners on the issue of addressing forced labour and child labour
- Monitoring suppliers



Crawford Metal Corporation

Approval and attestation

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 or entities 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.

I have the authority to bind the entities Crawford Metal Corporation/Corporation Acier Crawford and Crawford Acquisitions Corporation.

A handwritten signature in purple ink, appearing to read 'Gary Stern', written over a horizontal line.

Gary Stern

President

May 30, 2024