

CONTINUOUS COLOUR COAT LIMITED

REPORT FOR THE FINANCIAL YEAR ENDED DECEMBER 31, 2023

Continuous Colour Coat Limited (“CCCL”) is committed to supporting the goals of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) to eradicate forced labour and child labour in their supply chains. CCCL takes seriously its responsibility to address the requirements of the Act by promoting sustainable business and labour practices.

STEPS TO PREVENT AND REDUCE RISKS OF FORCED LABOUR AND CHILD LABOUR

The Act requires reporting entities to describe what steps they have 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 produced or imported into Canada by the entity. As described in greater detail below, CCCL has established various corporate policies and due diligence processes to reduce the risk of forced labour and child labour in its supply chains.

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

CCCL is a Canadian corporation wholly owned by New Star Metals Inc. (incorporated in Delaware, USA) with a single operating location in Toronto, Ontario.

CCCL is a leader in producing specialized coated metal products for customers primarily in Canada and the USA. The company emphasizes innovation and excellent customer service, utilizing advanced technologies for printing, painting, and laminating metal coils. For over 50 years, CCCL has produced high-quality, custom coated metal products, using materials such as carbon steel, stainless steel, and aluminum.

CCCL has established mature supply chains for manufacturing raw materials and MRO services and materials. CCCL suppliers are sourced within North America limiting exposure to risk of noncompliant human rights and labour practices.

POLICIES AND DUE DILIGENCE PROCESSES

CCCL’s corporate policy and processes support ethical business conduct and preclude the use of forced labour and child labour within its business and in its supply chains.

CCCL regularly conducts questionnaires with key vendors to assess and manage risks of forced and child labour involved in their supply chains. Vendors are notified of the requirement to comply with the Code in contractual terms governing CCCL purchases.

The Code requirement is also made public on our website.

IDENTIFYING FORCED LABOUR AND CHILD LABOUR RISKS

CCCL acknowledges that no industry can be assumed to be entirely free of forced labour and child labour risks and is aware of the need to identify risks in its supply chains. Through internal assessments, procurement strategies and supply chain reviews, CCCL has developed a risk assessment framework to mitigate compliance risks.

REMEDIATION MEASURES (INCLUDING REMEDIATION OF LOSS OF INCOME)

CCCL has not identified any instances of forced labour or child labour in its supply chains and therefore remediation is not applicable.

TRAINING

Employees involved in the supply chain process are trained in policies and processes related to the Act.

ASSESSING EFFECTIVENESS

To assess the effectiveness of the foregoing measures, CCCL engages in a process of continuous improvement which includes, but is not limited to, periodic reviews of its corporate policies to determine whether updates are warranted.

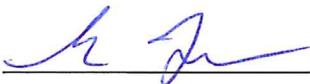
ATTESTATION:

In accordance with the requirements of the Act, 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.

Full name: Eric Fossen

Title: Executive VP and General Manager

Date: May 30, 2024

Signature: 

I have the authority to bind Continuous Colour Coat Limited.