

May 2024

Supply Chains Act – 2023 Report

1. Introduction

This report is made on behalf of the corporations Earl Horst Systems Ltd., Jade Initiatives Inc., and 2551682 Ontario Inc. and describes the actions taken by the Companies during the financial year ending December 31, 2023 to assess, prevent and reduce the risk that forced labour or child labour is used at any step in operations and supply chains pursuant to the requirements of section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“Act”). This Report constitutes the first report prepared by the Companies under the Act.

2. Structure, Activities and Supply Chains

Each of the Companies is a corporation based in Elmira, Ontario. Earl Horst Systems Ltd. is a subsidiary of Jade Initiatives Inc. which is a subsidiary of 2551682 Ontario Inc. As a consolidated entity, these Companies meet the criteria for being a reporting entity.

Jade Initiatives Inc. and 2551682 Ontario Inc. do not produce, purchase, or distribute goods. Earl Horst Systems Ltd. specializes in the design and construction of Grain Systems for customers located in Ontario and will be the focus of this report.

As a manufacturing and construction company, our supply chain is primarily based on the supply chain of material-handling, storage, and drying equipment. The majority of the Company’s procurement spend is for grain bins and accessories, elevator equipment, concrete and rebar, and raw steel. All suppliers of these goods are based in Canada or the United States. A preliminary review of these revealed no high-risk suppliers or industries.

We also purchase goods and services from other third-party suppliers including equipment rentals, shop supplies, repairs and maintenance for buildings, equipment, and vehicles, training services, professional services and office supplies. These goods and services are all sourced from suppliers based in Canada or the United States.

3. Policies and Due Diligence Processes

Our largest supplier is GSI. They are part of the AGCO group whose [supply chain due diligence](#) is detailed on their website. Other vendors of goods procured include supplier codes of conduct on their websites.

4. Assessment of Forced Labour and Child Labour Risks

In the first year of reporting, the Company has not independently engaged in its own risk assessment with regards to forced labour or child labour in its supply chain. As the majority of the Company’s supply chain is based on the supply chain of GSI, it relies on the assessment undertaken by them with regards to the extent of this risk.

5. Remediation Measures

The Company has not identified any instances of forced labour or child labour in its supply chain, and so no remediation measures have been taken.

6. Remediation of Loss of Income

The Company has not identified any instances where the measures it has implemented to eliminate forced labour or child labour from its supply chain has led to the loss of income, and so no remediation measures have been taken to address this issue.

7. Training

The company is investigating available training programs for the senior accountant and select members of the Accounting team. Upon completion, these employees will collaborate with the HR team to determine in-house training needs for employees responsible for procurement.

8. Assessing Effectiveness

The Company has not taken any action to assess its effectiveness in addressing risks of forced labour and child labour in its activities and supply chains.

9. Approval and Attestation

This report has been approved by the Owner of 2551682 Ontario Inc. in accordance with section "11(4)(b)(ii)".

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.

Full name: Glenn Horst

Title: Owner

Date: May 31, 2024

Signature:

A handwritten signature in black ink, appearing to read 'G. Horst', written in a cursive style.

I have the authority to bind 2551682 Ontario Inc.