



## **Bill S-211, the Supply Chains Act to fight against forced labour and child labour**

### **Excell Stamping Inc. Modern Slavery Statement for the Financial Year ended April 30, 2024**

This report is made pursuant to Bill S-211, the Supply Chains Act to fight against forced labour and child labour. This report outlines the approach and initiatives by Excell Stamping Inc. to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing May 1, 2023 and ending April 30, 2024. Excell Stamping Inc. takes pride in having established policies that outline our corporate commitment and support of established Workplace Violence and Harassment Policy as well as a Health and Safety Policy that is intended to ensure the health and safety of all of our employees. These policies are reviewed annually for any necessary revisions and signed off by Senior Management as well as our Health and Safety Coordinator. These policies are also reviewed annually with all employees as well as new Employees.

### **Group Structure**

Excell Stamping Inc. was established in 1977 and operates under the business name "Excell Stamping Inc." in Riverston Industrial Park, Kenilworth, Ontario N0G-2E0.

Excell Stamping Inc. is a Tier 2 supplier of medium to heavy gauge stampings to the transportation industry. Our primary products support the Class 6, 7 & 8 truck market as well as the automotive market.

### **Supply Chain**

Raw Materials are sourced from Canadian steel mills and service centers exclusively via direct purchase programs or customer directed programs and converted to semi-finished products that are then shipped to customer locations.

Majority of material purchases are made through Canadian Steel Mills and prepared for use by Canadian Steel Processors.

All products shipped from our facility are produced in one facility in Kenilworth, Ontario.

### **Risks in Supply Chain**

Any sub supplier that supplies services or is otherwise utilized by Excell Stamping Inc. in completion of products is vetted by Senior Management as well as our Quality Manager to ensure full compliance in support of designated health and safety and safe work environments. Excell Stamping Inc. also renews on an annual basis a certification to ISO 9001:2015. Sub-Suppliers utilized in the completion of any outsourced work must meet similar designations or controls as deemed appropriate by our Quality Manager. A survey has been sent to the top 20 suppliers by value chain to ensure and attest that adequate controls are in place to support all objectives of Bill S-211.

### **Actions Taken**

Excell Stamping Inc. has in place a Workplace Violence and Harassment Policy as well a Health and Safety Policy that has been put in place to ensure that all employees are aware of what is considered acceptable behaviour in the company. These policies are reviewed and revised on an annual basis to ensure adequate support exists for all employees and anyone visiting our facility. Excel Stamping Inc. also follows and adheres to any Customer Supplier code of conduct that is presented to us. Excell Stamping Inc. is CTPAT certified and reviewed periodically by a US customer.

### **Risk Assessment**

Excell Stamping's geographic location of its operations are solely based in Ontario Canada. As a result of this it could reasonably be assumed that the likelihood of child or slave labour being utilized by any of its suppliers would be extremely low. This assumption is based on the existing workplace laws and random inspections from Ministry officials that would ensure appropriate adherence to legal requirements. In support of this thought process an internal review was performed to discuss our current supply base which concluded that a risk assessment of the supply base was necessary.

Overall Excell Stamping utilizes sub suppliers that are local Canadian based operations with the exception of a small portion (less than 1%) operating in the United States. As US suppliers operate in a low risk jurisdiction and have high standards of protection for employees and make a very small contribution to the supply base they were deemed immaterial contributors to the overall risk to the operation. The goods, equipment or services purchased from the Canadian supply base are made from reputable and long term sources. The majority of Canadian suppliers have been utilized for at least 10 years.

A supplier survey was produced that was intended to capture all aspects of Bill S-211 and to require our supply base to review their internal suppliers and ensure controls were present that would support the requirements of the Bill. All surveys received at time of this report show zero risk in our immediate supply base.

### **Remediation**

The supply base currently utilized illustrates a very low risk of child or forced labour and as such any remediation was considered to be non-applicable.

### **Loss of income**

The supply base currently utilized illustrates a very low risk of child or forced labour and as such any loss of income to the most vulnerable families was considered to be non-applicable.

### **Training**

Excell Stamping Inc. has not provided training to employees in regards to the fight against forced and child labour as we considered our existing workplace violence and harassment policy and hiring practices to satisfy the requirements of the bill. We have an open door policy for the employees that adequately addresses any concerns raised immediately. Annual reviews of this policy are performed with all employees and it is integrated into orientations for new employees.

## **Effectiveness Assessment**

All workplace employment policies are reviewed annually by Senior Management and the company Health and Safety team. Completion of "Know Your Vendor" (KYV) supplier surveys have been sent to the top 20 suppliers providing an annual spend exceeding \$5,000 which resulted in no identified areas of concern within our supplier network.

Excell Stamping as part of required due diligence in support of Bill S-211 requirements will continue to monitor our existing supply base as well as require all new suppliers meet all aspects of the KVN supplier survey.

Future revisions and improvements to policy will be implemented as necessary to ensure continued compliance to Bill S-211.

## **Approval and Attestation**

This report was approved by the Directors and Senior Management of the Corporation May 17, 2024.

*This report is signed in accordance with 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; Excell Stamping Inc. 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.*



Rod Hodder, President and CEO  
Excell Stamping Inc.  
Date May 17, 2024

I have the authority to bind Excell Stamping Inc.