



This report is made pursuant to the Canadian *Fighting Against Forced Labour and Child Labour in small to medium sized companies* for the entity "Global Stainless Steel Inc."

This Report covers the financial year ended July 31, 2023

### **Structure:**

An international stockist and trading company founded in 2005, Global Stainless Steel Inc. sells stainless steel products worldwide, including key markets in China, India, the European Union and North America. Sales and purchasing offices are located on three continents in order to effectively take advantage of market place fluctuations.

### **Activities:**

Our 4,000 ton inventory includes 409, 430, 304 and 316 master coils and slit coils, as well as some sheet stock. Our turnover in the past 12 months consisted of approximately 25,000 MT of stainless steel products. We currently have available our inventory listed live on this site and will be expanding this to include large packages and lists for our overseas customers.

Our greatest resource is our people, displayed through their creativity and knowledge network. With mutual respect for suppliers, customers and employees, we aim to create a better business and work environment.

## **Policies and due diligence processes**

### **Internal Processes**

Global Stainless strives to be a responsible business enterprise and corporate citizen, with strong and shared commitments to our stakeholders. Global Stainless fosters a safe and healthy work environment where employees have opportunities for professional development, are treated with dignity and respect, and are recognized for their contributions. As per the Code of Business Conduct and the Whistleblower Procedure, Global Stainless does not tolerate discrimination of any form or harassment, including sexual harassment, or violence, and compulsory labour or child labour.

Global Stainless complies with all applicable provincial and federal laws and regulations as a minimum standard. All employees acting on behalf of Global Stainless are expected to comply with this commitment and all related Company policies, including:

- Employment Standards Act 2000;
- Labour Relations Act, 1995;
- Personal Information Protection and Electronic Documents Act (Canada), 2000;

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<sup>1</sup> In scope: Service and Material Vendors (Jan 2023 to Dec 2023). Out-of-scope: non-discretionary government entities

- Ontario Human Rights Code, R.S.O. 1990; and
- Occupational Health and Safety Act as amended, R.S.O. 1990 (“OHSA”).
- Internal Codes, Policies and Guidelines

**The Code Business Conduct and Whistleblower Procedure (“the Code”):** sets forth the basic principles of business conduct that all employees, officers, and directors are to follow – to exercise honesty and integrity in all duties and live up to the commitments to society and to stakeholders.

**Workplace Anti-Discrimination Policy:** affirms Global Stainless’s commitment to creating and maintaining respect for human rights, and fostering equality and inclusion.

**Workplace Harassment Policy and Program:** affirms Global Stainless commitment to the maintenance and promotion of a safe and respectful Workplace environment free from any and all forms of harassment, including sexual harassment

**Occupational Health and Safety Policy:** intended to assist in achieving the following: prevent injury and ill health of employees, contractors and visitors, continual improvement of OH&S management and performance, compliance with internal health and safety requirements and applicable legislation.

**Sustainable Procurement Guideline:** Provide direction and guidance in the evaluation of potential new suppliers and the performance of existing suppliers. This includes the consideration of social factors such as: human rights policies; fair operating practices; corporate governance; anti-corruption policies; code of conduct; support of the local economy.

**Work Standards Policy:** outlines how hours and location of work are managed and administered for employees. This includes, but is not limited to requirements and/or principles of: hours of work, such as core hours, shift work, and disconnection periods; overtime; standby; and location of work.

**Recruitment and Selection Policy:** Global Stainless is committed to promoting and enforcing recruitment, selection, and promotion processes that are based on principles of equality, diversity, and inclusion, as well as its obligations under Ontario’s Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005. Global Stainless’s recruitment, selection and promotion processes Ontario Law, the collective agreements, and the processes outlined in the Work Standards Policy.

As of May 11, 2023, the Government of Canada has enacted the Fighting Against Forced Labor and Child Labour in Supply Chains Act (hereinafter referred to as the "Act").

GLOBAL STAINLESS-STEEL INCORPORATION (GSSI) is committed to complying with all applicable laws and operating in a manner that always supports social responsibility. We aim to establish partnerships with all suppliers both locally and internationally to ensure that all related stakeholders embrace these fundamental principles.

## **POLICIES & DUE DILIGENCE PROCESSES WITH SUPPLIERS / VENDORS:**

According to the Act, for compliance GSSI must exercise due diligence to manage our supply chain and prevent the use of forced and child labour at any stage of the production of our products and services. Considering that our supply partners are an integral part of the conformance process we require our vendors to ensure the absence of forced or child labour in their own supply chains and in the production of the products they sell. In this certification, the definitions of "forced labour" and "child labour" are as follows:

**1. Child Labour:** means labour or services provided or offered to be provided by persons under the age of 18 years and that.

- a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada.
- b) are provided or offered to be provided under circumstances that are mentally, physically, socially, or morally dangerous to them.
- c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
- d) constitute the worst forms of child labour as defined in article 3 of the *Worst Forms of Child Labour Convention*, 1999, adopted at Geneva on June 17, 1999.

**2. Forced Labour** means labour or service provided or offered to be provided by a person under circumstances that.

- a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or
- b) constitute forced or compulsory labour as defined in article 2 of the *Forced Labour Convention*, 1930, adopted in Geneva on June 28, 1930.

## **SUPPLIER CERTIFICATION:**

By signing this certification, you attest and confirm the following as of this day and for all subsequent orders:

### **1. Agreement**

- You have read, understood, and agree to comply with the terms and conditions of this certification.
- You commit to adhering to all laws related to child labour and forced labour in all countries where your operations and those of your supply chain are conducted.

### **2. Monitoring and Control**

- You confirm having detected no use of child or forced labour in your operations or your supply chain.
- You have implemented and will maintain an effective monitoring and control system to regularly review your operations and your supply chain to identify risks and to prevent the use of forced labour or child labour.

### **3. Transparency**

- You will, as soon as possible, inform us if a situation contrary to the principles of this certification is discovered.

- You commit to providing us, upon request, with any document or information relating to forced labour or child labour in your supply chain.

**4. Remediation Measures**

- In case of violation, you commit to taking necessary corrective actions, including, but not limited to, establishing a detailed remediation plan, and modifying or terminating concerned supply relationships.

**5. Consequences in Case of Non-Compliance**

- We reserve the right to terminate any business relationship with you, including any purchase contract, in the event of a false declaration or non-compliance with this certification.
- This supplier certification creates no rights for third parties. This certification supplements the provisions of legal agreements between you and us and does not replace them.

**CERTIFICATION:**

I declare that I have the authority to bind the company named below and confirm the accuracy and truthfulness of the information provided.

Company Name: \_\_\_\_\_

Authorized company representative: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Khursheed Khan  
Controller , Global Stainless Steel Inc.  
May 31, 2024



I have authority to bind Global Stainless Steel Inc.