

# GREAT LAKES SLAG INC.

## ANNUAL REPORT

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT  
MAY 29, 2024

### Introduction

*The Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023, c 9 (the “Act”)* requires that businesses state actions they have taken during the fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This is a report for Great Lakes Slag Inc. (“GLS”). This report refers to the 2023 fiscal year end, being December 31, 2023, and describes steps taken by GLS in 2023.

GLS is committed to acting with integrity and ethically in all of its business transactions. Included in that commitment, is working with its suppliers and contractors to identify and reduce the risk of forced or child labour occurring within its supply chain network. GLS expects its business partners and suppliers (as well as their respective contractors, agents, subcontractors and sub-agents) to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

### GLS Structure, Activities and Supply Chains

#### **Structure**

GLS is a corporation formed under the laws of the Province of Ontario. GLS’s shareholders are St. Marys Cement Inc. (Canada) and CRH Canada Group Inc., each of whom have submitted a report pursuant to Section 11(a) of the Act. Neither St. Marys Cement Inc. (Canada) or CRH Canada Group Inc.’s report covers the activities of GLS. GLS’s head office is located at 2300 Steeles Avenue West, 4<sup>th</sup> Floor, Concord, Ontario L4K 5X6.

#### **Activities**

The business of GLS is:

- (a) owning and operating granulators;
- (b) purchasing molten blast furnace slag for manufacture into granulated slag;
- (c) purchasing granulated slag from third parties; and,
- (d) selling granulated slag to its shareholders.

GLS does not have any employees.

#### **Supply Chains**

GLS is committed to respecting human rights and upholding ethical business practices in its operations, including its relationships with its suppliers. GLS’s suppliers provide a variety of goods

(including but not limited to granulated slag and steel) and services (including but not limited to various professional and highly-skilled services (such as legal services, auditing services, engineering services, insurance services, environmental consulting services, geotechnical services) and other services (such as repair services, storage services, surveying services, general contractor services, operational/transportation/loading services)) to facilitate its business dealings. GLS aims to work with reputable, well-established suppliers and has less than 30 direct suppliers, a number of which are service providers as aforementioned or are primarily based in Canada and the United States. The shareholders of GLS, either on their own or through their affiliates, also supply GLS, and they employ due diligence processes with respect to forced labour and child labour as described in their own annual report.

### **GLS Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour**

GLS does not have any employees. GLS utilizes a supplier code of conduct, described in more detail below, to address the risk of modern slavery and to protect human rights.

#### ***Supplier Code of Conduct***

GLS has adopted a Supplier Code of Conduct (the “**Supplier Code of Conduct**”) that applies to all GLS suppliers. It embodies GLS’s commitment to conducting its business to the highest levels of legal, ethical and moral standards, in compliance with all applicable laws. The Supplier Code of Conduct sets out GLS’s expectations of its suppliers, including a commitment to good ethical practices and respect of human rights. More specifically, the GLS Supplier Code of Conduct requires GLS suppliers to prohibit all forms of modern slavery, including forced labour, bonded labour, compulsory labour and child labour, and to comply with all applicable legislation relevant thereto. It is a requirement that all GLS supplier become familiar with the Supplier Code of Conduct and apply its principles in the provision of their goods or services. GLS expects its suppliers to have similar requirements in place for their upstream supply chains and exercise due diligence in verifying their suppliers’ compliance.

### **Steps Taken to Prevent and Reduce the Risk of Forced Labour and Child Labour**

GLS has taken the following steps to prevent and reduce the risk of forced labour or child labour in its supply chains:

- GLS continues to require its suppliers to comply with the Supplier Code of Conduct, which requires suppliers to comply with applicable laws, including, but not limited to those respecting the prohibition of modern slavery, including forced labour, bonded labour, compulsory labour and child labour.
- The Supplier Code of Conduct has assurance procedures, which allows GLS to conduct audits of suppliers for compliance with the Supplier Code of Conduct and to terminate a supply contract with a supplier who violates the Supplier Code of Conduct or refuses if asked to take part in a remediation plan.

## **Risk of Forced Labour and Child Labour in GLS's Business and Supply Chains and Remediation**

GLS has reviewed its supply chains and concluded that they carry a low risk of forced labour or child labour. GLS has not identified (a) any forced or child labour in its supply chains or (b) any loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its supply chains. Accordingly, GLS did not take any corresponding remedial measures in 2023.

## **Assessing GLS's Effectiveness**

As GLS did not identify any forced labour or child labour or material risks of forced labour or child labour in its activities and supply chains in 2023, a formal assessment process with regards to GLS's effectiveness in ensuring that forced labour and child labour was not being used in GLS's business and supply chains was not implemented.

## **Approval**

This report has been approved by the Board of Directors of Great Lakes Slag Inc.

## **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.

DocuSigned by:

*Resha Watkins*

E9CEADE779D1498...

Resha Watkins, President

May 29, 2024

I have authority to bind Great Lakes Slag Inc.