

**Company Name: LMS Reinforcing Steel Group**

**Reporting Year: 2023**

**Report Title: Fighting Against Forced Labour and Child Labour in Supply Chains: Annual Report 2023**

This report (“Report”) is made in compliance with Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) by LMS Reinforcing Steel Group (“LMS”), a leading provider in the reinforcing steel industry.

This report has been prepared for the calendar year ended December 31, 2023. LMS's board of directors, as the principal governing body, approved the report on May 29, 2024.

**Company Structure and Supply Chains**

Company Overview

LMS Reinforcing Steel Group (LMS) supplies and installs reinforcing steel and post-tensioning for projects of all sizes in the residential, commercial, institutional, and infrastructure construction sectors. We have the comprehensive capabilities to service projects of all sizes throughout Western Canada and California

We collaborate closely with developers and general contractors to ensure seamless and efficient rebar installation, demonstrating our commitment to excellence in every aspect of our work.

Our dedication to customer service and productivity sets us apart in the construction industry. By setting high industry standards and fostering teamwork and communication on job sites, we consistently deliver exceptional results that exceed expectations. This formula has been integral to our success since our inception in 1987, driving our continuous growth and evolution as a company.

We have 3 rebar fabrication yards and 2 post-tensioning fabrication facilities in Western North America.

### Supply Chain Overview

To meet the needs of our diverse customer base, LMS sources reinforcing steel (rebar), prestressed concrete (PC) strand and concrete accessories, both globally and from suppliers in Canada and the USA. Our extensive supply chain network ensures we can provide high-quality materials for our projects, maintaining a reliable and consistent supply to support our operations and fulfill our commitments to clients.

While LMS's exposure to forced labour and child labour risks is considered low, our business necessitates procuring a significant number of supplies and materials from international manufacturers. These products are typically sourced directly from suppliers.

### **RISKS OF FORCED LABOUR OR CHILD LABOUR IN OUR SUPPLY CHAIN**

LMS is committed to the safety and health of its employees and conducts its operations in compliance with applicable laws and regulations. Suppliers are expected to provide a safe working environment. Suppliers are expected to remain in material compliance with all health and safety laws applicable to the operation and use of the facilities at which products are manufactured or stored on our behalf. Like with many global businesses, risks in our supply chain arise because of our limited visibility into our own suppliers' upstream supply chains.

Our current ability to trace the origin of specific products or inputs remains constrained due to our role as a downstream purchaser. Our limited visibility into the full supply chain of upstream suppliers underscores the need for enhanced due diligence and transparency within our supply chains.

### **HOW WE WORK TO ENSURE OUR SUPPLY CHAINS ARE FREE OF FORCED LABOUR AND CHILD LABOUR**

LMS is committed to supporting responsible sourcing of its materials from suppliers that share our values around human rights and ethics.

### **COMPANY POLICIES**

LMS is dedicated to ethical business practices and is in the process of implementing strict policies against forced labor and child labor.

These policies will be communicated to all employees, suppliers, and stakeholders to ensure adherence and accountability.

LMS is in the process of developing a Supplier Code of Conduct to lay out the obligations of its suppliers. The Code of Conduct will formalize LMS's expectation that suppliers be good corporate citizens and comply with all applicable laws and regulations, including those governing the manufacture of our products, safety, child labour, employment, labour, and the environment. Suppliers will be expected to be familiar with the business practices of their sub-suppliers and contractors and to operate within the guidelines of LMS's Code of Conduct. LMS takes its values seriously and its Code of Conduct will be viewed as its foundation and a critical element of any supplier relationship.

### **EMPLOYEE TRAINING ON FORCED LABOUR AND CHILD LABOUR**

LMS is working on developing relevant policies and evaluating the appropriate training programs for our employees, which will emphasize the importance of human rights and ethical sourcing practices.

### **HOW WE MONITOR OURSELVES AND OUR SUPPLIERS**

LMS is working to implement internal accountability standards and procedures to address employees, contractors, or suppliers who fail to meet company standards regarding slavery and human trafficking.

Credible information regarding a potential violation of the Global Anti-Human Trafficking Policy and the Human Rights Policy, whether discovered by LMS, employees and agents, or suppliers, and their employees and agents, will be promptly reported to the LMS Human Resources Department or Legal Department. Concerns can also be reported confidentially. LMS will prohibit retaliation against anyone who reports a concern in good faith.

### **HOW WE HAVE ADDRESSED REPORTED RISKS OR USE OF FORCED LABOUR OR CHILD LABOUR IN OUR SUPPLY CHAINS**

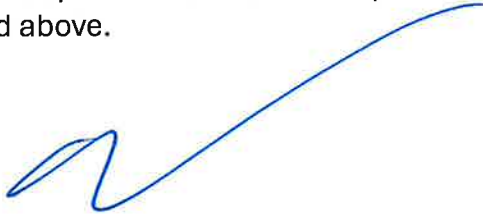
As of December 31, 2023, LMS has not faced situations of forced labour or child labour and has therefore not had to remedy and rectify such situations.

### **CONCLUSION**

LMS Reinforcing Steel Group is dedicated to eliminating forced labor and child labor from our supply chains. Through rigorous policies, diligent risk assessment, and proactive measures being implemented in 2024, we will strive to ensure ethical practices throughout our operations.

## **APPROVAL AND SIGN-OFF**

In accordance with the requirements of the Act, I attest that I have reviewed the information contained in the report for the entity 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.



Ron McNeil  
Chief Executive Officer and Co-Founder  
LMS Reinforcing Steel Group  
Date: May 28, 2024

*This comprehensive report reflects LMS Reinforcing Steel Group's commitment to addressing forced labor and child labor in its supply chains and respecting human rights, in alignment with the requirements of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act. Adjustments will be made based on specific company details and additional actions taken.*