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May 27, 2024

Northern Cables Inc.
Bill S211 Compliance Report
First Publication – Revision 0

Under the Canadian Governments newly introduced Bill S211, Northern Cables Inc. meets the reporting requirement threshold for a Canadian company:

- Northern Cables is located in Canada
- Northern Cables does business in Canada
- Northern Cables has more than \$20 Million in assets
- Northern Cables has more than \$40 Million in revenue
- Northern Cables has more than 250 employees

This report is for the 2024 reporting year.

Northern Cables Inc. is a privately held Canadian corporation (CRA# 893508689) based in Brockville, Ontario. Northern Cables manufactures power cable used in industrial and commercial construction and operation in both the US and Canadian markets (NAICS #335920).

There are 3 production facilities, two in Brockville Ontario and one nearby in Prescott Ontario. Northern Cables employs 280 people, all in Canada (meeting the reporting requirements of Bill S-211). Our production employees are covered by a Collective Agreement with Ontario Public Service Employees Union and we maintain employment standards that exceed the Province of Ontario's Employment Standards Act. Northern Cables pays membership fees and supports the activities of our national industry association – Electro Federation Canada (ElectroFed) as well as the US based National Electrical Manufacturers Association (NEMA).

Northern Cables completes tax filings for each jurisdiction that it conducts business in as is current in all regulatory reporting in the province of Ontario. The financial year is from February 01 to January 31.

Northern Cables core operations consist of the transformation of copper and aluminum rod into solid or stranded electrical conductors, insulation the conductors with a plastic insulation, twisting multiple insulated conductors into a cable, optionally covering the cable with a plastic protective jacket, covering the cable assembly with an overall interlocked aluminum armour and then optionally covering the armoured assembly with a plastic protective jacket. The product is wound on reels, spools or bound coils for shipment to customers.

Risk Assessment

2023 purchases and mapping:

MATERIAL	CONTENT	% OF TOTAL PURCHASE
Aluminum	86% Canadian content, 14% USA content	26%
Copper	40% Canadian content, 60% USA content	59%
Polyethylene	100% USA content (no Canadian supply)	4%
PVC plastic	100% USA content (no Canadian supply)	6%
Nylon Plastic	23% Canadian content, 77% USA content	1%
Mylar Tapes	100% Canadian content (no Canadian supply)	2%
Wooden Reels	100% Canadian content	2%
Wood/Metal	96% Canadian content 4% USA content	1%
Wooden Pallets	100% Canadian content	<1%

Northern Cables' products are highly regulated and materials must be approved and certified to Canadian standards (CSA) and USA standards (UL). As a company our culture is to only source materials made in North America and we incur additional costs in production in the avoidance of imported materials. Many of our competitors import lower cost materials to enhance their competitiveness. As part of our CSA and UL Certifications, we are not permitted to substitute raw materials without re-qualifying our product licenses. As part of our ongoing CSA and UL licensing audits, our purchasing documentation and incoming inspection practices are regularly audited by external auditors and inspectors to confirm that no substitutions have occurred. New material suppliers are only considered if their materials meet our internal and external requirements and criteria. This reduces the risk of introducing materials from high risk areas or unvetted suppliers.

Northern Cables uses primary raw materials such as aluminum or copper which is mainly purchased in rod or strip form, plastics that are purchased in pellet form. Peripheral materials such as binding tapes are purchased by the roll and wood shipping reels/spools are purchased for shipping product to customers. As our products are exported to the USA and we must conform to USMCA (formerly NAFTA), our metals are certified as "CONFLICT MINERAL FREE" and we have a Conflict Mineral Policy posted on our website. These purchases are monitored by the Canada Border Services Agency (CBSA) to ensure adherence to international trade policies.

Northern Cables has reviewed the US Department of Labor's "List of Good Produced by Child Labor or Forced Labor" <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods> as well as The Global Slavery Index 2023 produced by Walkfree.org <https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf> for materials relevant to Northern Cables.

We have confirmed from both sources that both Canada and the United States are not countries of concern relevant to the Northern Cables’ material, as well as that none of the core raw materials purchased are included as materials of concern other than copper from the DRC which is already excluded by the USMCA / NAFTA as being a “Conflict Mineral”.

Northern Cables remediates the risk of forced labour / child labour through the due diligence procedures and processes below:



USMCA Certificate Blanket Filing

Accepted by A.N. Deringer Inc.

Certifier
 NORTHERN CABLES INC
 PO BOX 1564
 50 CALIFORNIA AVE
 BROCKVILLE ON CA
 K6V 6E6
 (613)345-1594
 cludlow@northerncables.com

Producer
 SAME AS EXPORTER

Importer
 VARIOUS

Exporter
 NORTHERN CABLES INC
 PO BOX 1564
 50 CALIFORNIA AVE
 BROCKVILLE ON CA
 K6V 6E6
 (613)345-1594
 cludlow@northerncables.com

I certify that the good(s) described in this document qualify as originating under the United States-Mexico-Canada Agreement, and the information provided is true and accurate. I assume responsibility for providing such representations and agree to maintain and present upon request, or to make available during a verification visit, documentation necessary to support this certification.
 There has been no further production or any other operation outside the territories of the parties other than the unloading, reloading, or any other operation necessary to preserve it in good condition or to transport the good(s) into the territory of the importing party. The good(s) did not leave the custody of the customs authorities while outside the territories of the parties.

Submitter
 Digitally Signed By: *Chris Ludlow*
 Signature Date: November 27th, 2023 at 9:13:04 AM
 Name/Signature: Chris Ludlow
 Title: Controller
 Northern Cables Inc
 (613)345-1594
 cludlow@northerncables.com

Blanket Period
 Start: January 1, 2024
 End: December 31, 2024

Certification Indicator Key: A - Certifier is not the Producer, but has a certification or statement from the Producer.
 B - Certifier is the Importer, C - Certifier is the Exporter, D - Certifier is the Producer.

#	Part Number	Description	HTS	Certification Indicator	Origin Criterion	Country of Origin
1	VARIOUS	ARMOURD ELECTRICAL CABLE (COPPER CONDUCTORS)	8544.49.3080	C	B	CA
2	VARIOUS	ARMOURD ELECTRICAL CABLE (ALUMINUM CONDUCTORS)	8544.49.9000	C	B	CA
3	VARIOUS	SCRAP PVC OF POLYMERS OF VINYL CHLORIDE	3915.30.0000	C	B	CA
4	VARIOUS	SAME COPPER	7409.29	C	B	CA

Northern Cables focuses on sourcing materials within North America and declines offers of supply that are sourced overseas. We adhere to the USMCA (formerly NAFTA) purchasing requirements of “conflict free minerals”, we are a CTPAT Certified exporter and we support cleaner raw material supply chains with our own website “ www.cleanaluminum.com “

see policy: <https://northerncables.com/wp-content/uploads/2020/04/Northern-Cables-Conflict-Minerals-Statement.pdf>

Excerpts:

Northern Cables Inc. policy on Conflict Minerals:

1. Northern Cables Inc. is committed to take actions to avoid illegal and unethical metal sourcing from DRC and adjoining countries (*).
2. Northern Cables Inc. requests its suppliers to comply with the Dodd-Frank regulation, and in this regard, that the said suppliers have processes in place aimed to ensure that 3GT contained in products do not originate from mines within the DRC and the surrounding region.
3. Suppliers are requested by Northern Cables Inc. to determine the source of specified minerals and for that purpose to pass this requirement through their own supply chain.
4. If Northern Cables Inc. becomes aware of a supplier whose supply chain includes metals from a conflict source; the Company will take appropriate actions to remedy the situation.

* Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia

RISK ASSESSMENT FOR FORCED/CHILD LABOUR

Aluminum	Very Low Risk
Copper	Very Low Risk
Polyethylene	Very Low Risk
PVC plastic	Very Low Risk
Nylon Plastic	Very Low Risk
Mylar Tapes	Very Low Risk
Wooden Reels	Very Low Risk
Wood/Metal Spools	Very Low Risk
Wooden Pallets	Very Low Risk

Our corporate purchasing statement is posted on our website here:

<https://northerncables.com/wp-content/uploads/2022/10/Made-in-North-America.pdf>. Northern Cables also advocates for environmental considerations in our supply chain. We host www.cleanaluminum.com to support some of our actions. Northern Cables also maintains a deposit/return network across Canada for the return for re-use of our large shipping reels (which are all made in Canada). See link: <https://northerncables.com/reel-return-locations/>

Our employees are briefed on our corporate values at staff meetings, and we discuss our values in the areas of national security in relation to our CTPAT Certification and in ethical purchasing annually when reviewing our “Made In North America” beliefs and in the area of ethical labour sourcing with our Conflict Mineral Policy. We will now include the areas specific to Bill S211 in our employee onboarding and be reviewed annually.

The effectiveness of our policy will be tested by employee feedback at annual reviews as well as at initial and annual supplier reviews that also include Conflict Mineral Policy review.

After reviewing our supply chain, we believe that we have a very low risk that forced labour or child labour have any material input into our activities or supply chain. By excluding the production of non-USMCA products, the introduction of new supply chain risks is limited.

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.

Todd Stafford President April 25, 2024



I have the authority to bind Northern Cables Incorporated.