



## **S-211 Joint Report**

**Amalgamated Trading Ltd. | NSD Warehouse & Distribution Inc. | 259842 Ontario Ltd. (dba Amalgamated East) |  
NSD Warehouse & Distribution East Inc. | Reliable Tube Inc. | Western Checker Plate Inc.**

### **Structure**

The listed companies are engaged in various sectors of the Canadian steel industry. All share common ownership as part of the WT Miller group.

- Amalgamated Trading Ltd. (ATL) and Amalgamated East (ATE) source and import steel product from countries in Asia, Europe, and the UAE.
- NSD Warehouse & Distribution Inc. (NSD) and NSD Warehouse & Distribution East Inc. (NSDE) store the products that are imported
- Reliable Tube Inc. (Reliable) and Western Checker Plate Inc. (WCP) take delivery of the imported steel products and then process them for sale to their customers

### **Policies**

As part of its regular supplier review, Amalgamated Trading and Amalgamated East routinely travel to the source countries for high level meetings and inspections of their suppliers.

Meetings include conversations with the mill owners, chairman, presidents, etc. and assurances are given at the highest level there is no forced labour being used in the mill(s). We select suppliers who have received verification from global standard agencies, like SGS and ISO. As part of maintaining these standards, the mills must ensure there is no forced labour in their supply chain.

Supplier inspections consist of visual, on-site, tours of production facilities. During these inspections we can see the working conditions and talk with production staff about their overall treatment, which at times can include employer supplied living accommodations. Many of our suppliers provide a high standard of living on-site along with schools and medical facilities for workers and their families.

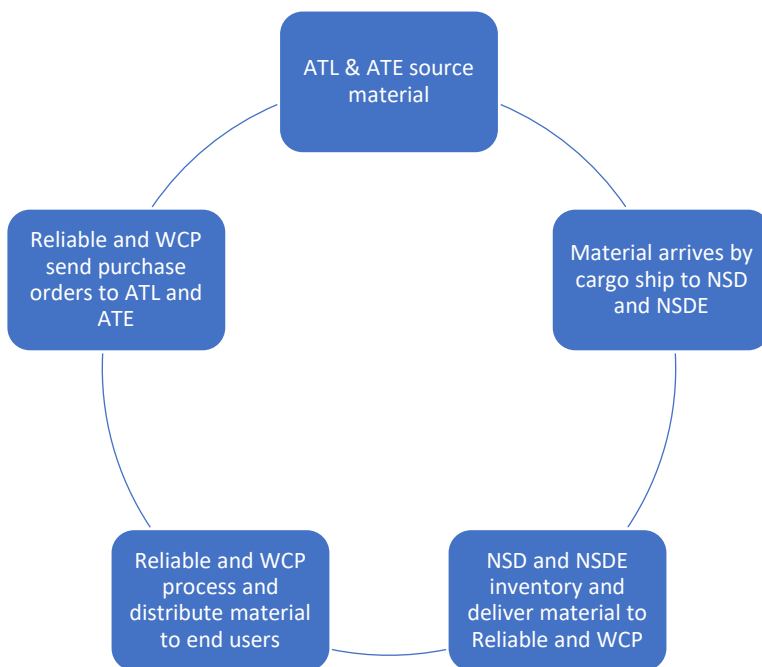
Generally, all suppliers of steel products are producers we've been dealing with for upwards of 20 years. The relationships between us and them are strong, open, and transparent. There is no question we cannot ask or information that is not shared. As a rule, we do not engage with a new supplier without first visiting their facilities to conduct management meetings and visual inspections of the working conditions.

### **WT Miller Holdings Ltd.**

Reliable Tube | Amalgamated Trading | Amalgamated Trading East |  
Western Checker Plate | NSD Warehouse & Distribution | NSD Warehouse & Distribution East  
**Office Address: Unit 110 – 30477 Gladys Avenue, Abbotsford BC, V2S 2E8**



## Supply Chain



## Internal Education & Training

The procurement teams at all companies are instructed to only deal with suppliers that have been vetted by the executive team and are approved as a vendor. Approved vendor lists are available through our ERP systems.

## Risk Assessment

The largest risk in the supply chain is in dealing with overseas suppliers, namely Asia. By adhering to our policies of dealing with approved vendors, conducting regular visual inspections, and confirming employment standards with upper management, we're able to mitigate the risk of modern slavery being present in our supply chain. We do not see any gaps in our risk mediation measures and are confident modern slavery is not being practiced at any of our suppliers.

### WT Miller Holdings Ltd.

Reliable Tube | Amalgamated Trading | Amalgamated Trading East |  
Western Checker Plate | NSD Warehouse & Distribution | NSD Warehouse & Distribution East  
**Office Address: Unit 110 – 30477 Gladys Avenue, Abbotsford BC, V2S 2E8**



WT Miller Holdings Ltd., the parent company of the entities noted in this report, is committed to keeping its supply chain free of modern slavery in all aspects. One of the core values at WT Miller is to ensure we are operating all businesses in a conscious manner and that any supplier we deal with, on any level, shares that same ideology.

Approved by the Chairman of WT Miller Holdings Ltd. on May 23, 2024

A handwritten signature in black ink, appearing to read 'William Miller'.

William Miller  
Chairman

**WT Miller Holdings Ltd.**

Reliable Tube | Amalgamated Trading | Amalgamated Trading East |  
Western Checker Plate | NSD Warehouse & Distribution | NSD Warehouse & Distribution East  
**Office Address: Unit 110 – 30477 Gladys Avenue, Abbotsford BC, V2S 2E8**