



ANNUAL REPORT

Purpose

This annual report for the 2023 financial reporting year has been created by Windsor Metal Technologies Inc. (“WMT”) and JNM Tool & Manufacture Inc. (“JNM”) for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “Act”). This is a joint report on behalf of WMT and JNM.

Organizational Structure, Activities, and Supply Chains

WMT and JNM are manufacturing businesses that focuses on designing and manufacturing special dies, transfer tooling, high strength steel/dual phase frame component, deep draw aluminized heat shields, and a wide assortment of metal stampings and welded assemblies in the automotive industry. WMT and JNM are principally located in Windsor, Ontario, Canada.

The following organizations are subsidiaries wholly owned by WMT and collectively they form the JNM Group of Companies: JNM, JNM Kentucky LLC, JNM de Mexico S.A. de C.V., Toolserv Arteaga S.A. de C.V., JNM de Mexico SLP S.A. de C.V.

Pursuant to this, WMT and JNM import steel and steel components from Canada, United States of America, Mexico, and China. These suppliers in some instances have their own supply chains, including overseas supply chains.

The Mexican subsidiaries, JNM de Mexico S.A. de C.V., Toolserv Arteaga S.A. de C.V., JNM de Mexico SLP S.A. de C.V., do not import into Canada. They primarily work in the United States and Mexican markets, and import into the United States.

WMT also sells goods inside and outside Canada, with most sales directed to customers located in the United States of America. Programs and jobs for manufacturing work are normally procured through a bidding process. Work programs are usually customer directed, where customers will direct WMT on where or who goods must be procured from to fulfill the requirements of the work. WMT primarily sells stampings and welded assemblies.

Policies and Due Diligence Processes

WMT and JNM maintain general due diligence processes that promote responsible, ethical and legal procurement practices, including with respect to labour practices within the supply chain.

WMT and JNM maintain a Code of Conduct that states each will comply with all applicable laws and regulations, including local and provincial codes, rules and regulations, applicable treaties and industry standards. WMT and JNM are also subject to several supplier codes of conduct as requested by their customers. Some of these supplier codes of conduct contain prohibitions and controls specific to forced labour and child labour, that WMT and JNM abide by.



In addition, WMT and JNM maintain employee policies that prescribe duties, responsibilities, and expectations of employment. This includes workplace policies and procedures to operate in compliance with provincial employment standards, human rights, and occupational health and safety legislation.

WMT and JNM also provide access to a hotline where workers may report any incident they believe to be an illegal action or violation of company policy.

Steps Taken in Prior Financial Year

The above due diligence processes and policies were in place in the prior financial year. No other steps were taken in the 2023 financial year aside from the above.

Forced Labour and Child Labour Risks

Moving forward, WMT and JNM will be working to identify specific risks of forced labour and child labour that may exist in its supply chain. It is aware that there may be higher risks associated with certain regions, goods, and industries.

In the 2024 financial year, the leadership of WMT and JNM started the process of reviewing and evaluating their internal policies and procedures with respect to the issues of child labour and forced labour. WMT and JNM have also undertaken an initial review of their policies, processes, and standard purchasing agreements to determine how they may be revised with respect to the Act and child labour and forced labour.

Remediation Measures

WMT and JNM have not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

Remediation of Loss of Income

WMT and JNM have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, it has not undertaken any income remediation measures.

Training Provided to Employees

WMT and JNM provide employee training both as part of its onboarding process and training is refreshed for employees annually. This includes training with respect to safe, ethical, and legally-compliant workplace practices and policies. Currently, WMT and JNM do not provide training specific to forced and child labour. However, they are assessing what training may be appropriate in the future.

Effectiveness Assessment

WMT and JNM do not currently have specific policies and procedures in place to assess its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its supply chain. However, it will be assessing what measures may be appropriate in the future.



Approval and 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 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.

IN WITNESS WHEREOF the authorized signing officer(s) of Windsor Metal Technologies Inc. and JNM Tool & Manufacture Inc. have executed this report as of the effective date of the signature set out below.

SIGNED)
)
)
31/05/2024)
_____)
Date)

WINDSOR METAL TECHNOLOGIES INC.

Per: 

Name: John Spidalieri
Title: President

) I have authority to bind Windsor Metal Technologies Inc.

SIGNED)
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31/05/2024)
_____)
Date)

JNM TOOL & MANUFACTURE INC.

Per: 

Name: John Spidalieri
Title: President

) I have authority to bind JNM Tool & Manufacture Inc.