

# Fighting Against Forced Labour and Child Labour in Supply Chains Act (Supply Chains Act)

## 2025 Annual Report

### Purpose

This report has been developed as a response to the reporting obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Supply Chains Act).

Reporting under the Supply Chains Act is an annual exercise that requires companies whose activities include producing, purchasing or distributing goods in Canada or elsewhere to publish a report on or before May 31 of each year.

The purpose of the legislation is to contribute to the implementation of Canada's international commitment to fight against forced labour and child labour through the imposition of reporting obligations.

506165 Ontario Limited (operating as Trillium Metal Stampings) is subject to reporting requirements of the *Supply Chains Act* and therefore must report on steps taken during its previous calendar year to prevent and reduce the risk that forced labour or child labour was used at any step of the production of goods produced, purchased or distributed by the entity.

### Scope

The 2025 report covers the steps Trillium has taken during 2024. This report reflects the measures undertaken by Trillium only, not its customers or suppliers. Trillium's customers/suppliers are responsible for developing and submitting their respective reports.

The information presented in this report is not comprehensive but is intended to provide a high-level overview of the measures taken by Trillium with the intention of providing more detailed information in future reports.

## Structure, activities and supply chains

### Company Overview

Trillium is a manufacturer of metal stampings, weld assemblies and electro/mechanical assemblies. The company is privately owned and is located in Kitchener, Ontario. Trillium employs approximately 80 employees.

## Supply Chain

Our primary supply chain is the purchase of steel from steel processing companies. The steel is purchased primarily from Canadian companies (95%) and some American companies (5%). In addition to steel, Trillium purchases components for assemblies. Approximately 95% are purchased from Canadian companies and 5% from American suppliers.

2024 saw Trillium begin to holistically map out its supply chain by categorizing its supplier list into various industries and by identifying inactive suppliers. Trillium will take steps to classify suppliers as high/low risk based on the industry, country of origin, and current controls in place by each individual supplier, among other relevant criteria, to combat forced labour in the 2025 calendar year.

Trillium developed a Supplier Code of Conduct with respect to Bill-S211 and will implement the policy in 2025.

## Policies and Due Diligence

Trillium maintains workplace policies to help ensure there is no forced or child labour in its own workforce. This includes only hiring employees consistent with the Ontario Employment Standards Act. Trillium has also developed our *Ethical Recruitment, Freedom of Association, and Forced Labour Policy*.

In 2024, Trillium initiated a supplier code of conduct to establish clear expectations regarding ethical labour practices, condemning the use of forced or child labour, as part of its commitment to mitigate risks along its supply chain as outlined by the Act. Trillium is exploring creating a due diligence survey that will be distributed to all active vendors to ensure compliance with the Supply Chains Act.

## Risk of Forced Labour

Trillium has not identified any forced labour or child labour in its activities or supply chains. As such, it has not taken any remediation measures. Trillium will continue to assess risk as we map our supply chain in the upcoming years.

## Remediation Measures

Trillium has not and would not knowingly engage with any supplier who is in violation of fundamental human rights. The company has not taken any remediation measures at this time.

## Training

All employees at Trillium received awareness raising training regarding the Supply Chains Act in 2024. Staff participated in a training session (30-mins) consisting of a high-level presentation regarding forced labour and Bill S-211. The 2024 training was developed internally. Further training is being developed to provide information on child labour and risky goods.

## Assessing Effectiveness

The Company does not have policies in place to assess the effectiveness. Although not yet in place, Trillium is committed to exploring mechanisms to assess effectiveness, which will further inform prevention measures to address risks of forced and child labour in our supply chains.

## Approval and Attestation

In accordance with the requirements of the Act, pursuant to paragraph (4)(a), I attest that I have reviewed the information contained in the report for 506165 Ontario Limited (o/a Trillium Metal Stampings). 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 2025.

Sarah Tebbutt

Chief Executive Officer

April 3, 2025



I have authority to bind 506165 Ontario Limited.