

# BELLEMARE

## 2024 ANNUAL REPORT ON FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

May 2025

## 1. INTRODUCTION

The report for fiscal year 2024 is presented by 9451-5939 Canada Inc. (hereinafter the "**Groupe Bellemare**" or the "**Company**"). It is the second report prepared by the Company in accordance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

SDF Abrasif Inc, a subsidiary of Groupe Bellemare, is the only entity required by law to prepare an annual report. However, Groupe Bellemare's policies apply to all its subsidiaries, and respect for human rights is important to the entire company, which is why this report covers Groupe Bellemare as a whole.

## 2. MEASURES TAKEN TO PREVENT AND REDUCE THE RISK OF FORCED LABOUR AND CHILD LABOUR

Groupe Bellemare is firmly committed to protecting human rights and providing a fair and ethical workplace. The Company expects the same commitment from its stakeholders.

During fiscal 2024, Groupe Bellemare maintained its policies on forced labour and child labour in accordance with the legislation in force for all its business sectors.

In addition, the Company has sent SDF Abrasif Inc. suppliers a questionnaire to audit their level of commitment to fundamental rights, working conditions, the fight against forced labour, child labour, human resources and occupational health and safety.

With the questionnaire, we also enclosed our *Supplier Code of Conduct*. This statement is a list of values and expectations that the Company has towards its stakeholders. This document was to be signed and returned to us.

After analyzing the questionnaires received, Groupe Bellemare has not identified any forced labour or child labour. In addition, the Company has noted that some companies are pushing their policies beyond the requirements of the law.

## 3. COMPANY REPRESENTATION

Groupe Bellemare is a joint-stock company with 450 to 500 employees, depending on the season. The head office is located at 8750, boulevard Industriel in Trois-Rivières, Québec.

The Company has several business segments, including:

- Specialized and non-standard trucking;
- Manufacture and transport of concrete and concrete products;
- Roller-compacted concrete paving;
- Heavy haul & rigging;
- Container rental;
- Sales and transportation of sand and aggregate products;

- Processing, distribution and sale of abrasives and specialty minerals.

SDF Abrasif Inc. specializes in the processing, distribution and sale of a range of specialty minerals for industrial, commercial and residential use. The main applications for these products are for sandblasting, waterjet cutting, filtration, grouting and foundry sands. A list of SDF Abrasif Inc. products and services is provided on the following page.

<b>SDF ABRASIF INC. LIST OF SERVICES AND PRODUCTS</b>	
<ul style="list-style-type: none"> <li>• Sandblasting <ul style="list-style-type: none"> <li>○ Bellemare Pro-Grit <ul style="list-style-type: none"> <li>▪ Iron Silicate</li> </ul> </li> <li>○ Natural Sand</li> <li>○ Bellemare Eco-Grit <ul style="list-style-type: none"> <li>▪ Recycled Glass</li> </ul> </li> <li>○ Primeblast <ul style="list-style-type: none"> <li>▪ Specular hematite</li> </ul> </li> <li>○ Steel Beads</li> <li>○ Steel Grit</li> <li>○ Glass Beads</li> <li>○ Aluminum Oxide</li> <li>○ Garnet</li> <li>○ Traprock</li> </ul> </li> <li>• Filtration and Pool Salt <ul style="list-style-type: none"> <li>○ Filtration Glass</li> <li>○ Filtration Sand</li> <li>○ Pool Salt</li> </ul> </li> <li>• Waterjet Cutting <ul style="list-style-type: none"> <li>○ Garnet</li> </ul> </li> </ul>	<p>List of products:</p> <ul style="list-style-type: none"> <li>• De-icing and Anti-skid <ul style="list-style-type: none"> <li>○ Sand and Salt Mix</li> <li>○ Anti-skid Stone</li> <li>○ De-icing Salt</li> </ul> </li> <li>• Premix Concrete and Ciment <ul style="list-style-type: none"> <li>○ Premix Concrete</li> <li>○ High-Strength Premixed Concrete</li> <li>○ Cement-Sand Mix</li> <li>○ GU TYPE 10 Portland Ciment</li> </ul> </li> <li>• Sandpits and Aggregates <ul style="list-style-type: none"> <li>○ Natural and Sieved Sand</li> <li>○ Natural Stone</li> <li>○ Crushed Stone</li> <li>○ Sieved Topsoil</li> <li>○ Recycled Aggregates</li> <li>○ Recycled Glass Mulch</li> <li>○ Stone Dust</li> <li>○ Bulk Products Transport</li> </ul> </li> <li>• Bagging Service</li> </ul>

#### **4. SUPPLIER CODE OF CONDUCT**

This document lists the expectations Groupe Bellemare has of its supply chain partners and other stakeholders.

The statements summarize a number of values that are important to the Company in ensuring a healthy, fair and equitable working environment for all. Compliance with the legislative framework for child labour and/or, in the absence of legislation, supervision to ensure that their education and physical and moral development are not affected. Forced labour and modern slavery must be banned outright.

## 5. SUPPLY CHAINS

Our production is entirely based in the Mauricie region of Quebec, Canada. However, the Company imports raw materials from many regions, including North America, Central and South Asia, Southeast Asia and the Middle East.

We are not knowingly complicit in human rights abuses or severe breaches of ethics and respect in the workplace. We recognize that our supply chains involve risks of forced and child labour. As part of our business activities, we have to import raw materials from all over the world. Certain regions may represent a risk.

We carried out virtual audits with our suppliers. We sent out 27 questionnaires. The response rate was 41%. Among the respondents were companies located in areas where forced labour and child labour are medium to high rates according to the *Walk Free, Global Slavery Index* ([walkfree.org](http://walkfree.org)).

The 40-question questionnaire covers the following topics: workers' social aspect, forced labour, child labour, human resources, health & safety, and the drafting of an annual report on the fight against forced labour and child labour.

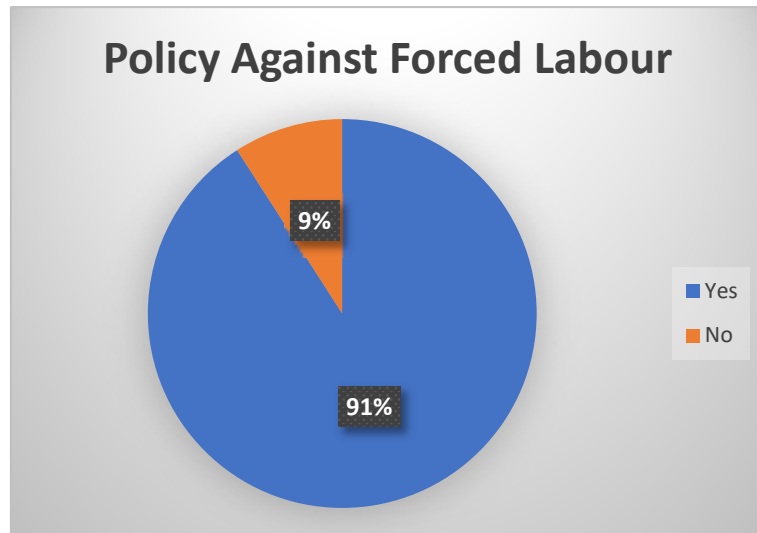
An overall analysis of the responses allows us to conclude that the companies who replied to the questionnaire have put in place either policies or procedures to combat forced labour and child labour. We perceive a real desire to perpetuate this fight.

The questionnaire includes 2 questions directly related to the fight against forced labour and child labour. A number of questions indirectly related to forced labour and child labour give us the opportunity to obtain a more global view and cross-check that the answers directly related to forced labour and child labour are realistic.

### Policy on Fighting Against Forced Labour

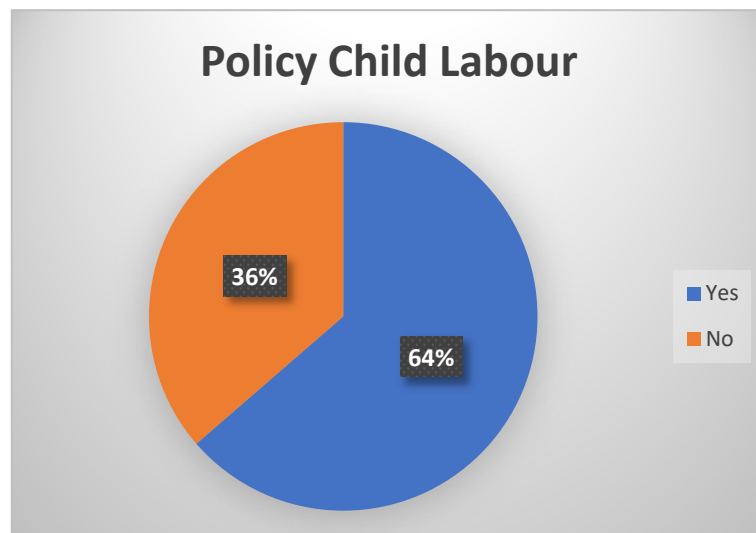
Only one company confirmed that it does not have such a policy. However, answers to questions indirectly related to forced labour led us to understand that it does not adhere to forced labour.

It is located in North America, where legislation against forced labour is well known and respected.



### Policy Against Child Labour

Four companies have no policy against child labour. Three of these are located in North America, where child labour is legalized. North America, according to the Walkfree website, is a low-risk region. Furthermore, two of these companies use indirect questions to confirm that they do not employ children. Finally, the last company confirms that it does not hire children.



For companies that have not yet completed the questionnaire or signed the *Supplier Code of Conduct*, we will be sending it out again, specifying the importance of completing it and signing the code.

In conclusion,

- All the answers lead us to the conclusion that our suppliers do not use forced or child labour.
- Several of our suppliers are geographically located in areas where the risk of forced and child labour is low.
- As for those in medium- and high-risk areas, the responses obtained indicate that forced labour and child labour are absent.

The companies that responded to our questionnaire showed us that they had policies in place to ensure a healthy, safe environment for their employees. What's more, the vast majority have policies in place to fight against forced and child labour.

As for those that do not have policies against forced labour and child labour, we'll need to keep a watchful eye to ensure that forced labour and child labour are not practised. Despite the absence of policies, these companies treat their employees equally, grant them the right to resign, and the country in which they are located has legislated against forced and child labour.

We'll follow up with companies that haven't filled in the questionnaire, demonstrating the importance of doing so.

## **6. CORRECTIVE MEASURES**

No situations of forced labour or child labour were identified. Consequently, Groupe Bellemare has not had to take any action to remedy the situation of forced labour or child labour, or to compensate for any loss of income for families affected by such measures.

In the event that a situation of forced labour or child labour is identified, Groupe Bellemare undertakes to implement a plan to effectively correct the situation. In particular, the company undertakes to work with any supplier who uses such practices to eradicate them.

## **7. EVALUATING THE EFFECTIVENESS OF MEASURES**

The virtual audits carried out by Groupe Bellemare using questionnaires enabled us to obtain a positive picture of the fight against forced and child labour among nearly half of our suppliers.

## **8. TRAINING**

In fiscal 2025, training will be provided for the sales team and selected managers. This training will cover the importance of combating forced and child labour, human rights,

the questionnaire and responses obtained for fiscal 2024, and the 2023–2024 annual reports.

## 9. APPROVAL AND CERTIFICATION

This statement applies to Groupe Bellemare as a whole. It has been approved by the Board of Directors of Groupe Bellemare and is signed by the President of Groupe Bellemare and a member of its Board of Directors.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), only SDF Abrasif Inc. is obliged to publish a report on its activities.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada), and in particular section 11 thereof, I, the undersigned, certify that I have examined the information contained in this report for the entity listed above. To the best of my knowledge and having exercised due diligence, I confirm that the information contained in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reference year mentioned above.

I have the power to bind 9451-5939 Québec Inc. and SDF Abrasif Inc.



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Serge Bellemare  
President

21 February 2025

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Date