



CCMA, LLC

**Fighting Against Forced Labour and Child Labour in Supply Chains Act Report
for Fiscal Year 2024**

Approved by the board of directors on May 29, 2025

A. Introduction

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) requires certain entities that do business in Canada to report on actions they have taken during the previous fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This report was prepared by CCMA, LLC (“**CCMA**” or the “**Company**”) and describes the steps taken by CCMA for the fiscal period of January 1, 2024 to December 31, 2024 (“**reporting period**”) to prevent and reduce the risk of forced labour and child labour in its own business operations and in its supply chains.

B. Structure, activities, and supply chains

CCMA is an independent, knowledgeable and innovative trading house focused on metals, alloys, and other raw materials. CCMA is privately owned and headquartered in Getzville, New York, USA.

CCMA is a trading company engaged in the sourcing, transportation, importing, trading and distribution of ores and concentrates, alloys, aluminum additives, base metals, minor and special metals, and other raw materials globally, including in Canada. Our Company sources products from suppliers located in North America, Asia, Europe, Africa and South America and acts as the importer of record into Canada.

We are proud of our long-term partnerships with world-class producers of critical materials and commodities across the globe. As a commodity trading company, CCMA’s supply chains are vital to our operation. We are focused on efficient sourcing and distribution rather than manufacturing or raw material production/extraction.

C. Policies and due diligence processes in relation to forced labour and child labour

1. Human Rights Policy

Our Human Rights Policy sets out our Company’s commitment to upholding the highest level of integrity with respect to human rights, social responsibility, the environmental and workplace health and safety in the conduct of our business and across our supply chain operations, in alignment with the United Nations’ Universal Declaration of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work. Regarding human rights, the Human Rights Policy specifies the following:

- CCMA takes a zero-tolerance approach to violations of human rights and expects that those in its supply chain to be similarly intolerant of child labor, forced labor, modern slavery, human trafficking or violation of any human rights law.
- CCMA is committed to meeting its responsibility in respecting and seeking to uphold all applicable internationally recognized human rights standards and laws.
- CCMA does not engage in, and expects its customers, suppliers and producers not to engage in, child labor, forced labor, indentured labor, slavery, human trafficking or exploitative work or environments.

- CCMA seeks to avoid sourcing conflict minerals (tin, tungsten, tantalum and gold) that contributed to armed conflict or human rights abuses in Conflict Affected and High-Risk Areas (“CAHRAs”), including the Democratic Republic of the Congo (“DRC”) and DRC-adjointing countries. CCMA also seeks to avoid harming communities in CAHRA through *de facto* embargoes of minerals responsibly sourced from those areas.
- CCMA seeks to take affirmative actions and conduct appropriate due diligence across its supply chain to uphold applicable internationally recognized human rights standards and laws, particularly with respect to the sourcing of materials that are at higher risk for having been mined or otherwise produced in violation of human rights, such as conflict minerals (tin, tungsten, tantalum and gold) or cobalt.

We seek to hold our customers, suppliers and producers to the same level of accountability, integrity and commitment to social business practices as we do ourselves. CCMA expects its business partners and other parties whose own impacts may be directly linked to CCMA’s operations to respect and not infringe upon human rights and will respond appropriately where they are not respecting human rights.

2. Employee Handbook

The Employee Handbook delineates specific practices and standards of ethical behaviour expected from employees, which include but are not limited to workplace conduct and behaviour, health, safety, and security. During the 2023 reporting period, CCMA implemented a whistleblower hotline and the employee handbook was updated to reflect these details. The whistleblower hotline continued in place throughout 2024. Employees are required to acknowledge that they will follow the guidelines and policies set out in the handbook. No complaints or allegations were made since inception of the hotline regarding any topics covered in this report.

3. Conflict Mineral and Responsible Sourcing Policy

CCMA developed the Conflict Mineral and Responsible Sourcing Policy (“CMRSP”) in 2023 which policy continued in effect throughout 2024. CCMA recognizes that it is involved in trade of certain minerals (tin, tantalum, and tungsten) that present a higher risk of forced labour and child labour. Although CCMA is not directly involved with mining or production operations, the CMRSP reflects CCMA’s commitment to taking affirmative actions and to conduct appropriate due diligence across its supply chain to uphold applicable internationally recognized human rights standards, laws and guidelines. The CMRSP was implemented in 2024 and we are not aware of any violations of our policy by CCMA personnel.

D. Risks of forced labour and child labour and the steps taken to assess and manage the risks

CCMA assesses risk on an ongoing basis in relation to its sourcing networks for all materials to prevent any associated materials linked to conflict or unethical practices. We have engaged a third party service provider to assess the Company across various sustainability criteria, in four themes: Environment, Labour and Human Rights, Ethics, and Sustainable Procurement.

CCMA conducts due diligence on its suppliers to ensure compliance with applicable laws and to manage third party risks. As part of the supplier pre-qualification and ongoing due diligence process, we leverage third party services providers to screen and monitor our suppliers and collect and assess information relating to risks, including risks associated with human rights (e.g., forced labour or child labour).

CCMA recognizes that due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas is an on-going process. CCMA therefore focuses on building transparent relationships with our suppliers and producers of conflict free tin, tantalum and tungsten that demonstrate ethical and transparent supply chain initiatives. We only procure conflict-free tin, tantalum and tungsten which is sourced from smelters that are approved by the Responsible Minerals Initiative (“RMI”) and/or produced from recycled sources. RMI defines standards for smelters and refiners that participate in the Responsible Minerals Assurance Process (“RMAP”). CCMA ensures that suppliers have successfully completed RMI’s RMAP within each assessment cycle or are in the process of reassessment by checking the current list published by RMI prior to each purchase. As part of the RMAP assessment, risks such as forced labour and child labour are identified and assessed.

E. Remediation measures

CCMA did not identify any instances of forced labour and child labour in our supply chains, and accordingly there were no measures taken in the reporting period to remediate the adverse impacts of forced labour or child labour. There were no identified instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in the Company’s activities and supply chains.

F. Training

All employees are required to acknowledge that they have reviewed the Employee Handbook and the Human Rights Policy. They also receive online training that addresses mechanisms for reporting workplace concerns.


G. Assessing effectiveness

During the reporting period, CCMA did not have formal policies or procedures in place to specifically assess its effectiveness in ensuring that forced labour and child labour are not used in its activities and supply chains. CCMA evaluates and updates its corporate policies and procedures periodically and is committed to continuous improvement.

H. Approval and attestation

This report was approved by CCMA, LLC's board of directors on May 29, 2025.

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.



Brian Dempsey
Chief Financial Officer and Chief Risk Officer

May 29, 2025

I have the authority to bind CCMA, LLC.