

DCR Systems Group Inc.

Financial reporting year: November 22, 2024 to January 31, 2025

Business number: 892966706

Sector/industry: Administrative and support, waste management and remediation services

Headquartered in: Ontario, Canada

Meeting Bill S-211 – Fighting Against Forced Labour and Child Labour in Canadian Supply Chains

The following document includes information on how [DCR Systems Group Inc.](#) addresses each of the legal requirements in subsections 11(1) and 11(3) of Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (“the Act”).

11(1) A description of the steps taken to prevent and reduce risks of forced labour and child labour, as per subsection 11(1)

DCR Systems Group Inc. has certifications for [R2v3](#) (responsible recycling), [ISO9001](#) (quality management), [ISO14001](#) (environmental management system), and [ISO45001](#) (health and safety).

DCR is compliant to the [Responsible Business Alliance](#) (RBA) and is required to adhere to and be accountable for a set of requirements for responsible business conduct in global supply chains.

Specifically, the [RBA Code of Conduct](#) requires DCR to commit to the following: forced labour, including slavery and human trafficking, is strictly prohibited; workers should have freedom of movement within the workplace and access to facilities; work must be voluntary; child labor is strictly prohibited in all manufacturing stages; workers must not face harsh, inhumane treatment or discrimination; and more.

All new employees are asked to show proof of eligibility to work in the country. DCR will confirm a worker’s age and does not employ any persons under the age of 18.

DCR performs internal audits and is audited by external organizations annually to ensure compliance with our standards and commitments (see 11(3)-g).

Finally, to ensure compliance within our supply chain, DCR has a downstream survey and approval process for new vendors. Vendors must sign they are not using forced or child labour. Moreover, downstream partners must be certified to the first R2 facility if they are accepting focus materials.

11(3) Supplementary information addressing each of the seven requirements in subsection

a) Its structure, activities and supply chains

DCR Systems Group is an IT asset disposition (ITAD) company offering end to end asset management services on top of in house storage and distribution. DCR was purchased by 1001042449 Ontario Inc. on November 22, 2024. This is a holding company related to Quantum Lifecycle Partners LP. Quantum is a Limited Partnership with two groups of shareholders with expertise in the metal recycling industry: [Combined Metal Industries](#) and the [Giampaolo Group](#).

DCR has 1 location with 60 employees. The company primarily receives electronics for reuse and recycling from small to large sized companies, government, individual drop-off locations, OEM returns and more.

DCR sells repaired and refurbished electronics for reuse to consumers and companies in Canada, the United States and, to a lesser extent, internationally. All other material is sent to approved downstreams.

b) Its policies and its due diligence processes in relation to forced labour and child labour

As part of DCR's R2v3, ISO9001, ISO14001, ISO45001, and RBA certifications and commitments, the company has several policies that relate to forced labour and child labour.

At DCR, all employees are trained on their rights and freedoms of their provincial ministries of labour. This training happens annually as part of our health and safety policy fulfillment. DCR has the RBA Code of Conduct which all supervisors must follow. This Code of Conduct covers freely chosen employment, no child labour, fair wages, humane treatment and more. Other policies including: an environmental policy, quality policy, health and safety processes; an Unsafe Work policy; a Civil and Respectful Workplace policy; a Purchasing policy for employees responsible for purchasing materials, services and equipment to ensure health and safety risks are considered as well as meeting relevant standards and legislation; a communication policy which outlines internal and external communications; and more.

c) The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk

DCR's own internal controls and processes identify there are no activities we participate in where there is a significant risk of forced or child labour.

International supply chains may have more inherent risk due to DCR having less direct control and oversight.

However, our R2v3 certification, which requires downstream vendors be approved, and our compliance with the Basel Convention – which protects human health and the environment against the adverse effects of hazardous wastes – are the mechanisms we use to minimize supply chain risks internationally.

d) Any measures taken to remediate any forced labour or child labour

Not applicable. No forced labour or child labour has been identified.

e) Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains

Not applicable. No forced labour or child labour has been identified.

f) The training provided to employees on forced labour and child labour

At DCR, all employees are trained on their rights and freedoms of their provincial ministries of labour. This happens annually.

All supervisors receive RBA training annually on forced labour and child labour. This training is mandatory. These supervisors are responsible for hiring and managing employees, as well as purchasing and other decisions relating to the supply chain.

g) How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

The compliance team audits the company's policies and processes annually to verify compliance to all of our standards.

DCR is audited annually by a third-party certification body for R2v3, ISO9001, ISO14001, and ISO45001 certifications. This includes onsite visits from the auditors.

Finally, customers also audit our facility on a regular basis.

Signed 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 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.

I have the authority to bind DCR Systems Group Inc.



Michael Dunwoody, VP Finance

Date : May 30, 2025