

# Forced Labour and Child Labour in Supply Chains Report

## Fiscal Year 2024

### 1. ABOUT THIS REPORT

This report relates to the financial year ending December 31, 2024. It is published by GMR, Globe Metal Recycling Services Inc. (the “**Company**”) in compliance with Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

References in this report to “Globe Metal”, “Company”, “we”, “our” and similar terms are to GMR, Globe Metal Recycling Services Inc. and to those who work for it.

### 2. PREVENTING AND REDUCING RISKS OF FORCED LABOUR AND CHILD LABOUR

At Globe Metal, we strongly believe in shaping a more sustainable world by promoting a circular economy, as our core business lies in the transformative process of converting waste into valuable assets that can be used locally, and globally, through our vast network of international partners.

In line with those principles, Globe Metal is also committed to sourcing materials from companies that share our values around human rights, ethics and environmental responsibility.

During the last financial year, we continued our efforts to prevent and reduce risks that forced labour or child labour be used at any step of our supply chain, including the following:

- we have continued to apply responsible sourcing due diligence measures regarding the purchase of metals;
- we have been gathering information on worker recruitment and maintaining internal controls to ensure that all workers at Globe Metal are recruited voluntarily and treated fairly;
- through our whistleblower policy, we have maintained access to grievance mechanisms which enable employees to report any concerns or complaints they may have regarding illegal or unethical practices they may witness through their employment with Globe Metal, which may include any forced labour or child labour issues.

This report further describes the above actions, amongst others.

### 3. ABOUT US & OUR SUPPLY CHAIN

Globe Metal is an ISO 9001-certified and a recognized metal recycler and metal supplier that helps environmentally-minded companies keep metal-bearing waste material out of landfills, and recycle it for reuse in new production processes.

Our business is two-fold: (i) processing and recycling industrial metals from nearly every industry to supply manufacturing companies, and (ii) supplying high quality minor and primary metals, ferroalloys, high temperature alloys and specialty steels to mills and foundries. Our customers include manufacturers in a variety of industries, including oil and gas, aerospace, electronics, original equipment, special stainless steel alloys, and foundry industries,

Globe Metal operates out of two plants located in Chateauguy and Sainte-Catherine, in the province of Québec, Canada.

Our experienced sourcing team follows strict procedures to foster responsible procurement and the Company has developed excellent global sourcing capabilities by working with an international network of suppliers. Approximately 70% of our top 25 suppliers are based in the US and Canada, while we also have important suppliers in foreign countries such as China, India, Peru, Hong Kong and different European nations. These suppliers have their own supply chains that extend across multiple countries in Asia, South America and Europe, over which we have limited visibility.

#### **4. POLICIES AND DUE DILIGENCE PROCESSES**

Globe Metal is committed to acting ethically and responsibly in all our business relationships. Although we have not yet implemented our own policies and processes regarding the prevention of forced and child labour in our activities and supply chains, we apply a zero-tolerance policy for human rights abuses.

##### ***Employee Handbook***

Our recruitment procedures allow us to ensure that all workers at Globe Metal are recruited voluntarily and treated fairly. When hiring an employee, we require the completion of an application form, we conduct interviews under the supervision of the human resources department, we require reference and background checks and we send conditional offers to successful applicants. We have a zero-tolerance policy regarding any employment practices and procedures that are contrary to the Québec Charter of Human Rights and Freedoms, which prohibits discrimination and harassment based on race, colour, sex, pregnancy, sexual orientation, marital status, age (except as provided by law), religion, political convictions, language, ethnic or national origin, social condition, disability or the use of any means to palliate a disability.

As part of their onboarding, new employees receive a copy of our employee handbook, which contains an employee code of conduct and various policies, including on human rights, harassment and discrimination and violence in the workplace. Their employment is conditional upon their acknowledgement and signature of such policies.

Globe Metal expects all employees to act with honesty, integrity and respect. For this reason, our employee handbook includes a whistleblower policy pursuant to which employees are encouraged to report any act of misconduct or non-compliance which they believe involves, among others, failure to comply with legal or regulatory obligations to which Globe Metal is subject (including human rights laws and regulations) and improper conduct, such as psychological and/or sexual harassment or unethical behavior. The handbook provides for protection against disciplinary or retaliatory action for whistleblowers acting in good faith and indicates that complaints are treated confidentially and with the seriousness and due process it demands, all things considered.

##### ***Due Diligence Processes***

Globe Metal is a member of the Responsible Minerals Initiative, which provides companies with tools and resources to support responsible sourcing of minerals from conflict-affected and high-

risk areas. In the context this initiative, we implemented the following responsible sourcing due diligence measures regarding the purchase of metals:

- establishing a responsible minerals sourcing policy;
- requiring our direct suppliers to source conflict minerals from smelters whose due diligence practices have been validated by an independent third party audit program;
- implementing due diligence measures for responsible sourcing, including occasional on-site visits of our suppliers;
- conducting conflict minerals surveys of our relevant suppliers; and
- reviewing due diligence information received from our suppliers against Globe Metal's expectations.

In implementing these actions, we hope to achieve a sustainable and resilient minerals supply chain, and prevent the risk that forced or child labour be used to produce the metals we recycle.

## **5. RISK ASSESSMENT & REMEDIATION MEASURES**

Globe Metal believes that the likelihood of encountering forced labour or child labour in our direct operations in Canada is low, as we strictly adhere to applicable laws and regulations during the recruitment process, employing a workforce primarily composed of skilled production workers and office personnel.

As for our procurement practices, we are conscious that there is no such thing as a risk-free supply chain and although we have not conducted a formal risk assessment, we know that one of the potential risk areas for our organization is the challenge of effectively tracing the origin of recycled metals we procure due to the inherent complexities involved in the process.

We also recognize that global supply chains that extend into foreign countries may be exposed to higher human rights risks and that we do not have complete visibility on our suppliers' sourcing. However, we strongly believe that we can mitigate such risks through our continuous efforts to conduct our business in an ethical and socially-responsible manner, by favouring sourcing our raw and recycled materials from reputable suppliers in the industry and by fostering long-lasting relationships with repeat suppliers that adhere to responsible business conduct.

That said, no instances of forced labour and child labour have been identified in our activities and supply chains. Consequently, no measures were taken to remediate such instances or to remediate the loss of income to the most vulnerable families that may result from measures taken to eliminate the use of forced labour and child labour. Globe Metal has not and would not knowingly engage with any supplier who is in violation of fundamental human rights, including through the use of forced labour and child labour.

## **6. ASSESSING THE EFFECTIVENESS OF OUR APPROACH**

We acknowledge the importance of evaluating and disclosing our progress in mitigating human rights risks. Therefore, we plan to continue to review our statements, policies, procedures, and practices periodically to determine whether any enhancements should be made to reinforce our commitment to preventing forced labour and child labour from taking place in our business and in


any of our supply chains, including by considering, where appropriate, implementing measures to assess the effectiveness of any of our processes.

## 7. APPROVAL AND ATTESTATION

This report was approved by the Board of Directors of GMR, Globe Metal Recycling Services Inc. on May 30, 2025 pursuant to subparagraph 11 (4)(a) of the Act and constitutes the Company's report for the financial year ending December 31, 2024.

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 GMR, Globe Metal Recycling Services Inc. 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 indicated above.

I have the authority to bind GMR, Globe Metal Recycling Services Inc.

DocuSigned by:  
  
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Full name: Jeffrey Solomon

Title: Director

Date: May 30, 2025