



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

A. INTRODUCTION

This report was prepared by Green Metals Canada, Inc. (“GMCI”, “Company”, “we”, “us”), in accordance with the requirements of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”).

At GMCI, we are committed to conducting our business ethically and responsibly. We recognize the significance of protecting human rights and are dedicated to combating forced and child labour throughout our operations and supply chains.

This report describes GMCI's activities during its most recent financial year, April 1, 2024, to March 31, 2025 (“reporting period”) to prevent and mitigate the risk that forced labour or child labour is used at any step in GMCI's supply chains and provides additional information set out in the Act.

B. OUR COMPANY – STRUCTURE, ACTIVITIES, AND SUPPLY CHAIN

GMCI is an environmentally responsible company specializing in recycling ferrous, non-ferrous, and post-industrial plastic scrap materials. Our recycling processes, which utilize environmentally safe technologies, are carried out at our facilities in Woodstock and Cambridge, Ontario.

All activities are conducted in adherence to ISO 14001 guidelines, ensuring standardized and sustainable practices. We manage a broad supply chain, with most of our suppliers based in North America.

C. POLICIES AND DUE DILIGENCE PROCESSES ON FORCED AND CHILD LABOUR

1. Global Code of Conduct and Ethics

Our Global Code of Conduct and Ethics (COCE) reflects GMCI’s corporate philosophy of “living and prospering together with people, society, and the globe” and serves as a guide for ethical business conduct.

The COCE expresses our commitment to respecting human rights and prohibits forced labour, child labour, and any form of discrimination or harassment. All employees must comply with the COCE and are encouraged to report violations through established channels.

2. Statement of Commitment

During the reporting year, GMCI’s president reaffirmed our commitment to eliminating forced and child labour within our supply chains. As part of this pledge, we reviewed our structure, operations, and suppliers and implemented policies, including the Ethical Trading Policy and the Supplier Sustainability Code of Conduct (outlined below). This Statement is prominently displayed at all GMCI facilities.

3. Ethical Trading Policy

Our Ethical Trading Policy, implemented during the reporting period, formalizes GMCI's ethical standards for employees, customers, suppliers, and the community. The ETP commits GMCI to monitor labour and environmental practices across our supply chain and to decline partnerships with companies that fail to meet ethical standards.

The ETP outlines requirements concerning labour practices, including the prohibition of forced and child labour, fair working conditions, non-discrimination, and a commitment to health, safety, and environmental responsibility.

4. Illegal Labour Policy

To further reinforce our stance, GMCI developed an Illegal Labour Policy during the reporting period. The ILP explicitly prohibits illegal labour practices, including forced labour, child labour, human trafficking, and slavery. All employees are required to uphold this policy.

Under the ILP, GMCI monitors both internal and supplier labour practices. We commit to discontinuing business with organizations that do not meet our ethical standards or violate labour laws and will take swift corrective action when necessary.

5. Supplier Sustainability Code of Conduct

We updated our Supplier Sustainability Code of Conduct to clearly communicate expectations for personnel, suppliers, and service providers. The SSCOC addresses human rights, health and safety, environmental protection, and ethical business practices, in alignment with global standards such as the Universal Declaration of Human Rights and ILO conventions.

GMCI expects our suppliers to:

- Respect the fundamental labour standards set forth in the conventions of the ILO about the abolition of forced labour, child labour and slavery.
- Not use any form of forced labour; this includes prison labour, bonded labour, indentured labour, slave labour, and/or labour derived from human trafficking.
- Be responsible for payment of all recruitment fees and expenses and not charge any such fees to their workers.
- Maintain workplaces free from physical abuse, sexual harassment, threats, intimidation, and verbal or psychological harassment.
- Commit to providing and maintaining a safe and healthy workplace for visitors and workers.
- Respect the right to freely associate, organize, and bargain collectively in accordance with local laws and ILO conventions.

The SSCOC also states that GMCI can verify supplier compliance with the SSCOC, including, through site visits and inspections. The SSCOC further states that if a supplier fails to comply with any aspect of the SSCOC, immediate notice of violation shall be provided, and suppliers will be subject to corrective action and potentially termination of the business relationship.

The SSCOC requires suppliers to immediately report any instances of illegal or unethical behavior or breaches of the SSCOC and to prohibit retaliation against any person for reporting, in good faith, contraventions of the SSCOC.

D. DUE DILIGENCE PROCESSES

GMCI performs due diligence on suppliers to ensure legal compliance and manage third-party risks. Our risk-based approach considers regional and commodity-specific risks related to forced and child labour.

Due diligence covers both direct and indirect suppliers and may include supply chain mapping and documentation for traceability. This targeted approach allows GMCI to focus efforts where risks are highest.

E. ASSESSING AND MANAGING FORCED AND CHILD LABOUR RISKS

GMCI acknowledges that there is risk that forced labour and child labour can occur at any stage of the supply chain, with risk levels varying based on factors such as type of product or the country/region of manufacture or raw material sourcing.

During the reporting period, GMCI developed a due diligence standard operating procedure that describes the processes necessary to identify and mitigate a variety of risks in our supply chain, including forced labour and child labour risks. The processes include but are not limited to: supply chain mapping, due diligence of suppliers, compliance verification, etc.

The Company is identifying the primary forced labour and child labour risks that exist within its supply chains which will inform focused diligence and compliance activities. Our suppliers are aware that they may be required to undergo heightened due diligence and we look forward to working with them to ensure that they and their suppliers do not employ forced or child labour and have themselves put measures into place to manage these risks in their own supply chains.

F. TRAINING

GMCI employees must complete annual online training on the COCE, which includes content on compliance and human rights. A knowledge assessment is part of this training.

Additionally, employees involved with direct suppliers, including executives and managers, participated in specialized training on forced and child labour, the SSCOC, and relevant GMCI policies.

G. REMEDIATION MEASURES

No instances or significant risks of forced or child labour were identified in GMCI's operations or supply chains during the reporting period. Therefore, no remediation or income restoration measures were required. GMCI remains committed to assessing and mitigating risks in collaboration with its suppliers.

H. ASSESSING EFFECTIVENESS

GMCI introduced and updated several measures during the reporting period to mitigate forced and child labour risks. We are in the process of developing frameworks to evaluate the effectiveness of these measures and will review them annually to identify potential improvements.

I. APPROVAL AND ATTESTATION

This report was approved by the Green Metals Canada, Inc.'s board of directors on May 23, 2025.

In accordance with Section 11 of the Act, I hereby attest that I have reviewed the contents of this report. To the best of my knowledge, and having exercised reasonable diligence, I confirm that the information is true, accurate, and complete in all material respects for the stated reporting period.



Grant Town

Director and President

05/25/2025

Date: _____

I have the authority to bind Green Metals Canada, Inc.



Document History

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