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Report on Bill S-211 Fighting Against Forced Labour and Child
Labour in Supply Chains Act (the "Act")

Part 1 – Submission Information

1. This report is for which of the following?

- Entity
 Government institution

2. Legal name of reporting entity or government institution

Ingot Metal Company Limited

3. Reporting year

May 31, 2025

4. Financial year covered by report

July 1, 2023 to June 3, 2024

5. Is this a revised version of a report already submitted this reporting year?

- Yes
 No

6. For entities only: Business number(s):

102488533

7. For entities only: Is this a joint report?

- Yes
 No

8. For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?

- Yes



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No

9. For entities only: Which of the following categorizations applies to the entity? Select all that apply.

Listed on a stock exchange in Canada

Canadian business presence (select all that apply):

Has a place of business in Canada

Does business in Canada

Has assets in Canada

Meets size-related thresholds (select all that apply):

Has at least \$20 million in assets for at least one of its two most recent financial years

Has generated at least \$40 million in revenue for at least one of its two most recent financial years

Employs an average of at least 250 employees for at least one of its two most recent financial years

10. For entities only: Which of the following sectors or industries does the entity operate in? Select all that apply.

Agriculture, forestry, fishing and hunting

Mining, quarrying, and oil and gas extraction

Utilities

Construction

Manufacturing

Wholesale trade

Retail trade



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- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- Other, please specify: Brass and Bronze Ingot Manufacturer

11. For entities only: In which country is the entity headquartered or principally located?

Canada

11.1 If in Canada: In which province or territory is the entity headquartered or principally located?

Ontario



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Part 2 - Annual Report

Reporting for Entities

1. Which of the following accurately describes the entity's structure?

- Corporation
- Trust
- Partnership
- Other unincorporated organization

2. Which of the following accurately describes the entity's activities?

- Producing goods (includes manufacturing, extracting, growing and processing), in Canada
- Producing goods (includes manufacturing, extracting, growing and processing), outside Canada
- Importing into Canada goods produced outside Canada
- Controlling an entity engaged in producing goods, in Canada
- Controlling an entity engaged in producing goods, outside Canada
- Controlling an entity engaged in importing into Canada goods produced outside Canada

3. What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply.

- Mapping activities
- Mapping supply chains
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Conducting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains



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- Developing and implementing an action plan for addressing forced labour and/or child labour
- Gathering information on workers recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains.
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains.
- Developing and implementing child protection policies and processes
- Developing and implementing anti-forced labour and/or -child labour contractual Clauses
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Auditing suppliers
- Monitoring suppliers
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
- Developing and implementing grievance mechanisms
- Developing and implementing training and awareness materials on forced labour and/or child labour
- Developing and implementing procedures to track performance in addressing forced labour and/or



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Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour

Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks

Information not available for this reporting period

Other, please specify:

4. Please provide additional information describing the steps taken.

Ingot Metal Company Limited, maintains a strong commitment to upholding fair and ethical labour practices. The company has established recruitment policies and procedures that are designed to prevent the occurrence of forced or compulsory labour within its workforce. These measures include transparent hiring standards, the prohibition of recruitment fees charged to workers, and ongoing oversight of third-party recruitment agencies to ensure compliance with ethical employment practices.

In alignment with Canadian labour and human rights legislation, Ingot Metal's recruitment processes adhere to the Canada Labour Code, the Employment Standards Act, 2000 (Ontario), and the Human Rights Code (Ontario). These laws collectively prohibit exploitative employment practices, guarantee minimum working standards, and protect individuals from discrimination or coercion in the workplace. Furthermore, the company acknowledges the reporting and due diligence obligations under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (2024), which requires Canadian businesses to demonstrate efforts taken to prevent forced labour in their operations and supply chains.

Through these measures, Ingot Metal affirms its responsibility to conduct business in a manner consistent with both Canadian legal requirements and international labour standards. By maintaining transparent recruitment processes, conducting ongoing risk assessments, and engaging in continuous improvement, the company demonstrates its commitment to ensuring that forced labour has no place in its hiring practices or broader operations.



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5. Does the entity currently have policies and/or due diligence processes in place related to force labour and/or child labour?

Yes

No

5.1. If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply.

Embedding responsible business conduct into policies and management systems

Identifying and assessing adverse impacts in operations, supply chains and business relationships

Ceasing, preventing or mitigating adverse impacts

Tracking implementation and results

Communicating how impacts are addressed

Providing for or cooperating in remediation when appropriate

6. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?

Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

Yes, we have started the process of identifying risks, but there are still gaps in our assessments.

No, we have not started the process of identifying risks.

6.1. If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.

The sector or industry it operates in

The types of products it produces, sells, distributes or imports

The locations of its activities, operations or factories

The types of products it sources



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- The raw materials or commodities used in its supply chains
- Tier one (direct) suppliers
- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour
- The use of forced labour
- The use of child labour
- None of the above
- Other, please specify:

7. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply.

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance



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- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- None of the above
- Other, please specify: Brass and Bronze Ingot Manufacturer

8. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk.

The majority of our metal sourcing is conducted within the United States and Canada, both of which maintain well-established and robust employment law frameworks. As a result, we assess the risk of child labor or forced labor within our operations to be very low. All employees are provided with an employment handbook that references the Employment Standards Act and outlines the comprehensive benefits, training opportunities, and services offered by Ingot Metal Company (IMCL). Based on our due diligence and research to date, we have found no evidence of forced labor or child labor within our supply chains.

9. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?

- Yes, we have taken measures
- No, we have not taken remediation measures.



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Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

10. Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?

Yes, we have taken measures.

No, we have not taken remediation measures.

Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains

11. Does the entity currently provide training to employees on forced labour and/or child labour?

Yes

No

12. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?

Yes

No

Attestation

This statement was approved by the Board of Directors of Ingot Metal Company Limited on August 02, 2025.

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this 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 Canadian Act, for the reporting year listed above.



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I have the authority to bind Ingot Metal Company Limited



Marty Schwarz, CEO