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ANNUAL REPORT Bill S-211

This report is made pursuant to Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"). The report outlines the approach and initiatives taken by Janco Steel Ltd. ("Janco Steel") to identify and address the risks of forced labour and child labour in its business operations and supply chains in the 2024 financial reporting year.

Our Commitment

Janco Steel is committed to preventing and reducing the risk that forced labour or child labour is used in the production of the goods it sells to its customers, who are located exclusively in Canada and the United States. The company relies on ethical business practices and operates in compliance with national and international labour standards.

Organizational Structure, Activities, and Supply Chains

Janco Steel is a steel processing company operating in the manufacturing sector, with locations in Stoney Creek and Wellesley Township, Ontario. The company currently employs 300 workers.

Janco Steel buys steel coils from steel mills and other suppliers that are primarily located in Canada. The company has suppliers that are located in other countries, including the United States, Taiwan, Turkey, Sweden, South Korea, and Egypt. It then processes these materials into steel products that are sold in Canada and the United States.

Janco Steel is also aware that the origins of some of the material bought from vendors includes Belgium, China, France, Germany, and India.

Policies and Due Diligence Processes

Janco Steel maintains workplace policies to help ensure there is no forced or child labour in its supply chain. This includes procedures that prohibit hiring local employees who are below the legal working age.

The company also maintains an hours-of-work policy and a recruitment policy that are consistent with the Ontario *Employment Standards Act, 2000*. In addition, Janco Steel requires any onsite contractors to attest to their compliance with all applicable employment laws.

Steps Taken

Although Janco Steel has not taken other steps specific to the prevention of forced or child labour, the company is exploring what additional steps may be appropriate for its operations.

Forced Labour and Child Labour Risks

Moving forward, Janco Steel will be working to identify specific risks of forced labour and child labour that may exist in its supply chain.

Remediation Measures

Janco Steel has not identified any forced labour or child labour in its activities or supply chains. As such, the company has not undertaken any remediation measures.

