



ANNUAL REPORT

This report is made pursuant to *Fighting Against Forced Labour and Child Labour in Supply Chains Act* S.C. 2023, c. 9 (the “Act”). The report outlines the approach and initiatives taken by Kimco Steel Sales Limited (“**Kimco Steel**”) to identify and address the risks of forced labour and child labour in its business operations and supply chains in its 2024 financial reporting year.

OUR COMMITMENT

Kimco 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 in Canada and globally.

CATEGORIZATION, SECTOR, AND INDUSTRY

Kimco Steel is an entity under the Act

Kimco Steel operates a steel service centre, scrap metal, and recycling facility in Kingston, Ontario. Kimco Steel also meets the minimum asset and revenue thresholds as defined in the Act.

Our Operations

Kimco Steel’s steel service centre, scrap metal, and recycling facility is one of the largest steel warehousing facilities in Eastern Ontario. Located in Kingston’s Industrial Park, Kimco Steel has 240,000 square feet of steel warehousing and over 35,000 tons of steel inventory.

As both a scrap recycler and a new steel distribution centre, Kimco Steel sells its processed scrap to steel mills and then buys finished products back from mills for distribution. The company also provides cut-to-size customizations for oversized structural steel. Finally, Kimco Steel provides containerized refuse, construction, and demolition pickup service to parts of Kingston and offers disposal containers service to its customers in other parts of Canada and the United States.

STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Our Structure

Kimco Steel is a corporation incorporated pursuant to the *Business Corporations Act* (Ontario). Its key activities are the manufacturing and wholesale trade of steel products for its local and

international consumers. The company is engaged in producing, selling, and importing goods in and/or outside of Canada, as well as importing into Canada goods that are produced outside of the country.

Our Supply Chain

Visit our WEB SITE @ www.kimcosteel.com
Our E-MAIL ADDRESS is sales@kimcosteel.com



Kimco Steel sources and procures structural steel materials from various approved vendors who are located in Canada and internationally. Most of its scrap metal vendors are located in North America. Additionally, the company works with suppliers of structural steel materials from outside of North America, including the United Kingdom, mainland Europe, and Asia. The finished goods produced by Kimco Steel are primarily sold across Canada and the United States.

POLICIES AND DUE DILIGENCE PROCESSES

Kimco Steel has due diligence processes in relation to forced and/or child labour, including embedding responsible business conduct into policies and management systems. In its previous financial year, Kimco Steel maintained several policies and processes to help identify and manage potential forced labour and child labour risks within the business and its supply chain, including:

1. A Roles and Responsibilities of All Workplace Parties Policy, which requires that only workers over the prescribed age are employed by Kimco Steel. In addition, no party may knowingly permit anyone under the prescribed age in or about the workplace;
2. An Employee Code of Conduct, which sets out how employees can report a potential or actual breach of the Employee Code of Conduct on a confidential and anonymous basis; and
3. An Internal Auditing Policy, which sets out the process and scope of Kimco's internal audit. The scope of internal audit includes reviewing the systems established to ensure compliance with policies, procedures, statutory requirements, and regulations and to report significant risk exposure.
4. Kimco used a 3rd party firm to analyze its CBSA import information to identify any imports which would be considered from an area which would be at a higher risk for Forced and/or Child Labour.
5. Kimco developed a standalone employee training module on our Child Labour and Forced Labour Policy. This was deployed to all new hires and added to the annual refresher training for existing employees.
6. Kimco developed a Supplier Code of Conduct Questionnaire which was sent out to our most significant suppliers.

In the subsequent reporting years, Kimco Steel intends to continue to educate our staff on this matter and send the Supplier Code of Conduct Questionnaire to a wider group of suppliers. Kimco Steel also intends on adding language to all Purchase Orders addressing Forced and Child Labour.

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FORCED LABOUR AND CHILD LABOUR RISKS

1. The analysis of our import information identified one specific vendor whose products were imported by Kimco from an area that was considered at a higher risk of Forced and/or Child Labour. Kimco reached out directly to that vendor who assured us that they made routine visits to their location and found no issues of Forced and/or Child Labour.

REMEDIATION MEASURES

Kimco 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.

REMEDIATION OF LOSS OF INCOME

Kimco Steel has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, the company has not undertaken any income remediation measures.

TRAINING PROVIDED TO EMPLOYEES

Kimco Steel provides general training to its employees, including with respect to safe and legally compliant workplace practices and policies. In 2024 Kimco Steel implemented a standalone training module on our Child Labour and Forced Labour Policy. This module is now included in all new hire training and current employee annual refresher training.

ASSESSING EFFECTIVENESS

Our Health and Safety department assess the completeness of the employee training requirements on this subject. In subsequent years we plan to assess the vendor communication regarding Forced and Child Labour.

APPROVAL AND 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 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.

IN WITNESS WHEREOF the authorized signing officer(s) of Kimco Steel Sales Limited have executed this report as of the effective date of the signatures set out below.

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SIGNED

) KIMCO STEEL SALES LIMITED
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)
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27-May-2025

Date

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) **Name:** Cody Rosen
) **Title:** President
)
) I have authority to bind Kimco Steel Sales Limited

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