



Bill S-211 Report

Joint Report for the fiscal year ended December 31, 2024.

This statement is made pursuant to Bill S-211, an Act to enact the fighting against forced labour and child labour in supply chains. This statement outlines the approach and initiatives by Ringball Corporation and Vanguard Steel Ltd., (the “Company”), to identify and address the risks of forced labour and child labour in its business operations and supply chains during the fiscal year.

SECTION 1 – Structure, activities and supply chains

Structure

Ringball Corporation was established on February 11, 1953, while Vanguard Steel Ltd. was formed on March 14, 1960.

The Company employs over 210 employees and operates out of six storage and distribution facilities in Canada located in Montreal, Mississauga, Winnipeg, Edmonton and Vancouver. Head Office is located in Mississauga.

The Company is governed by the Board of Directors. The President oversees company-wide operations; and Branch Managers direct and oversee the specific day-to-day operations at their respective facilities.

Activities

Both companies operate as private enterprises engaged in the wholesale importation and distribution of various industrial supplies. The Company does not manufacture but rather distributes to national and regional distributors, machining shops and original equipment manufacturers.

Supply Chains

The Company sources a variety of industrial products, most of which are sourced abroad from Canada. Apart from Canadian vendors, suppliers are located throughout Asia, Europe as well as from the United States of America. The Company relies on various shipping channels including ocean/sea, air and trucking. The Company also has long standing relationships with freight-forwarders which it uses to ship and deliver products to customers.

SECTION 2 – Policies and due diligence processes

Above all, the Company is committed to respecting all human rights and conducting business in adherence with the highest standards of integrity, responsibility and ethical behavior. The Company's commitment to protecting human rights and responsible labour practices is founded on its strong belief on doing the right thing. The manner in which its operations and global supply chain partners uphold these commitments to human rights, including preventing forced labour and child labour, is critical to the Company's long-term business success.

All workers across the Company's operations must work under voluntary conditions. The Company will not, and has not, used any involuntary labour. Conversely, the Company will not, and has not, used any child labour that would contravene any local labour laws.

SECTION 3 – Risk Assessment

A formal risk assessment and mapping process has not been completed; however, the Company is presently committed to engaging in employment practices that meet all ethical and legal standards, including laws and regulations related to forced and child labour, in the markets in which we operate. Similar to its internal commitment to preventing the use of forced and child labour, the Company also expects its suppliers to share and uphold these same commitments across their business operations.

We strive to accomplish this by several means, including

- **Monitoring our suppliers:** We are in continuous communication with our suppliers to gauge how they operate and if there is any indication of violation of human rights, we raise the issue and assess the impact on continuing the business relationship.
- **Site visits:** We periodically visit our overseas suppliers to not only foster business relationships and learn about new products, but also to examine their operations via walkthroughs of their facilities. This allows an opportunity to witness how our suppliers conduct their operations.

- Annual Branch Manager's Meetings: The Company meets annually to discuss various business matters including customer and supplier relations. Branch Managers share their experience with each other and highlight any concerns, challenges or perceived difficulties in our supply chains.

SECTION 4 – Remediation measures

No formal remediation measures have been implemented.

The use of forced and child labour is strictly prohibited. Should the Company become aware of the use of forced or child labour in its supply chain, management would assess its impact and take necessary steps to address any potential violations. Management recognizes it is vital to act quickly to protect the victim.

SECTION 5 – Remediation of loss of income

No formal remediation of loss of income measures have been taken.

SECTION 6 – Training

No formal training to employees on forced and child labour is currently conducted.

Through our Quality Assurance Manual, which includes guidance on supplier selection from an Approved Vendor List, management is advised at each Branch to monitor their supply chains for fair and ethical practices.

During the onboarding process for new employees, the following Policies are reviewed and acknowledged, which address abiding by the Human Rights Code and acting with integrity:

- Employee Handbook
- Corporate Policy - Occupational Health & Safety, Workplace Violence and Harassment
- Accessibility for Ontarians with Disabilities (AODA)

SECTION 7 – Assessing effectiveness

Although no formal assessment of effectiveness has been implemented at this time, management will continue to monitor our supply chains for any indication of the presence of forced and child labour.

Approval and Attestation

Reporting entity's legal name: Ringball Corporation
Financial reporting period: Fiscal year-ended December 31, 2024
Joint report for the following entities: Ringball Corporation
- AND -
Vanguard Steel Ltd.

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 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 Act, for the reporting year listed above.

I have the authority to bind Ringball Corporation.

Date: May 9, 2025



Craig Spence

President & CEO