



rousseau métal inc.
105, avenue de Gaspé Ouest
Saint-Jean-Port-Joli (Québec)
G0R 3G0 Canada

www.rousseau.com

May 27th, 2025

**Subject: Commitment to Compliance with Bill S-211 and
the Fight Against the Use of Conflict Minerals (3TG)
Fiscal Year 2025 - # 119366649 / manufacturing**

To whom it may concern,

In accordance with the requirements of the Act, and in particular its section 11, as well as the Fight Against the Use of Conflict Minerals (3TG), we certify that we have reviewed the information contained in the report for the entity listed above.

To the best of our knowledge, and after having exercised reasonable diligence, we confirm that the information contained in the report is true, accurate and complete in all material respects for the purposes of the Act, for the above-mentioned reporting year.

Hoping everything is in order, please believe in our best feelings.

Charles-Alexandre Paré
President & C.E.O

Michel Lacombe
Vice president

Sébastien Lavoie
Secretary

CAPMLSL/mt

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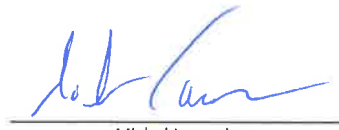
ROUSSEAU METAL INC.
105 ave. de Gaspé Ouest
ST JEAN PORT JOLI QC G0R 3G0

Company "entity" / revised report : May 2025
119366649

1. Report aims to maintain and regularly update a policy/procedure to combat forced labor and child labor, Bill S-211, effective January 1, 2024. Rousseau is committed to avoiding doing business, where possible, or refusing to do business with such companies, where applicable. Within this policy/procedure, Rousseau has also incorporated the public disclosure of information on a company's use of conflict minerals in its supply chain, specifically tin, tungsten, tantalum and gold (3TG), to ensure that these minerals do not finance armed conflict, in both (2) cases, in order to promote responsible sourcing.
2. Rousseau Métal works in the field of manufacturing metal furniture, mainly in the organization of work for various fields: commercial, Industrial, Institutional, hospital, mining, automotive, etc. and favors the supply of its raw materials from suppliers located in the following regions, in order of priority: local, provincial, national and International, where applicable.
3. To identify potential risks of forced labor and child labor as well as those related to the use of conflict minerals (3TG), Rousseau Métal has built a list of at-risk suppliers from its bank of certificates of origin (CUSMA) received from our active suppliers on an annual basis. The list of its targeted suppliers is available in Appendix B; these are suppliers whose country of origin denotes a country of origin located in the regions of South America, the Middle East, Africa and Asia. By targeting these main regions, we are aware that depending on the results, discussions could be initiated with our current suppliers. We are aware that the fight could force us to review our sources of supply. In addition, we are evaluating an internal reporting mechanism to allow any Rousseau employee to identify a suspicious situation of forced labor and child labor and/or the use of conflict minerals (3TG).
4. Preventive measures to engage Rousseau and its management in the fight against forced labor and child labor as well as the use of conflict minerals (3TG) consist, as a first step, of identifying risks in its supply chain. A voluntary declaration form (Appendix A) was created and sent to targeted suppliers at risk (point 3). As of today, we have accumulated the forms, combined with an assessment of buyers regarding risks higher than direct sourcing. As of today, our success rate in receiving such a commitment from our targeted suppliers is nearly 85%.
5. Suppliers are currently assessed using the ISO-9001 process in place. The process has been duly modified to include Rousseau's commitment to the fight against labor and child labor as well as the use of conflict minerals (3TG). This process is audited annually by an internal auditor as well as by one or more auditors from an external firm, also on an annual basis. The S-211 compliance commitment report, also integrating the use of conflict minerals (3TG), was presented to the Executive Committee as well as to the members of our Board of Directors to raise their awareness of the importance of these new criteria in the Rousseau supply chain, which is in addition to the criteria already established by our process, namely price, quality and deadline. Therefore, from now on, any potential supplier in the process of obtaining a supply contract with Rousseau will have to sign the voluntary declaration (Annex A) before obtaining said contract and be validated for the use of conflict minerals, if applicable. In addition, managers in the Procurement Department have received extensive training on forced and child labor and the fight against the use of conflict minerals (3TG). This training is found in Appendix C.
6. See Appendix B for commitments/reports received to date demonstrating that these new criteria are current and alive within our supply chain. Rousseau will make every effort to ensure commitment to this fight against forced labor and child labor as well as the fight against the use of conflict minerals (3TG) by strengthening, where appropriate, its network of supply sources, if necessary.
7. Given that our manufacturing operations are 100% carried out in the province of Quebec, that we must respect the hiring of personnel over 15 years old as well as the maximum working hours during the school period, we are sensitive to the aspect of this law, i.e. in the fight against forced labor and child labor, as well as in the fight against the use of conflict minerals (3TG). In addition, our family-type business culture is "de facto" linked to this law S-211/3TG. We will make it our duty to enforce the application of this law as well as to fight against the use of conflict minerals (3TG) and will modify our processes, if necessary, to ensure compliance.

Admin Team


Charles-Alexandre Paré
Président directeur général


Michel Lacombe
Vice-président


Sébastien Lavioie
Secrétaire

Date :

May 26th 2025



105, avenue de Gaspé Ouest
 Saint-Jean-Port-Joli (Québec)
 G0R 3G0 CANADA
 418.598.3381
 info@rousseau.com

Subject: Voluntary Declaration Regarding Compliance with Bill S-211, “Fighting Against Forced Labour and Child Labour in Supply Chains Act”

To Whom It May Concern,

As of January 1, 2024, the Canadian government bill S-211 became law and is aimed at combating forced labour and child labour in supply chains. This legislation specifies that Canadian manufacturers are required to work towards reducing these practices, including investigating our supply chain partners seeking and reporting any suppliers who may engage in such business practices.

While we have confidence in your commitment to this legislation (S-211), we request a signed declaration affirming compliance. A letter is required, as the legislation requires manufacturers to track compliance in the first tier of supply.

Please find attached the link to the law (S-211), which has been approved by the House of Commons of the Canadian government. <https://www.parl.ca/documentviewer/fr/44-1/projet-loi/S-211/sanction-royal?col=2>

As mentioned, Rousseau requests your firm to certify that your supply chain is compliant with S-211 and that your firm is committed to taking all necessary actions to eliminate such practices globally, investigating your supply chains and implementing concrete measures.

I, undersigned _____, representative of _____, have familiarized myself with Law S-211 and certify that the products sold to Rousseau Metal Inc. comply with S-2111.

Signed at (city): _____, on (date): _____.

Sincerely,

Name

Title

Compagny name

Date

ANNEXE B - 2025

Suppliers	Nbr of HS code	Language	Reply	Nbr of HS code signed	
Compagnie # 1	1	F	Signed	1	
Compagnie # 2	1	A	Signed	1	
Compagnie # 3	1	F	Signed	1	
Compagnie # 4	1	A	Signed	1	
Compagnie # 5	2	A	Signed	2	
Compagnie # 6	8	A	Signed	8	
Compagnie # 7	10	A			
Compagnie # 8	1	F			
Compagnie # 9	1	A	Signed	1	
Compagnie # 10	11	A	Signed	11	
Compagnie # 11	4	A			
Compagnie # 12	4	F	Signed	4	
Compagnie # 13	1	F	Signed	1	
Compagnie # 14	2	F	Signed	2	
Compagnie # 15	1	A	Signed	1	
Compagnie # 16	1	F	Signed	1	
Compagnie # 17	1	F	Signed	1	
Compagnie # 18	3	A	Signed	3	
Compagnie # 19	1	A	Signed	1	
Compagnie # 20	1	F	Signed	1	
Compagnie # 21	10	A	Signed	10	
Compagnie # 22	1	F	Signed	1	
Compagnie # 23	18	A	Signed	18	
Compagnie # 24	25	A	Signed	25	
Compagnie # 25	8	A	Signed	8	
Compagnie # 26	18	F	Signed	18	
Compagnie # 27	2	A	Signed	2	
Compagnie # 28	1	F	Signed	1	
Compagnie # 29	9	F	Signed	9	
Compagnie # 30	3	A	Signed	3	
Compagnie # 31	3	F			
Compagnie # 32	11	A	Signed	11	
Compagnie # 33	1	A	Signed	1	
Compagnie # 34	4	A	Signed	4	
Compagnie # 35	2	A	Signed	2	
Total S-211	172			154	89.53%

Suppliers	Nbr at risk	Language	Report rec'd signed	Total	
Compagnie # 1	1	F	Oui	1	
Compagnie # 2	1	A	Oui	1	
Compagnie # 3	1	A	Oui	1	
Compagnie # 4	1	A	Oui	1	
Total 3TG	4			4	100.00%

Training session

Procurement

Law S-211

Obligation for Canadian companies to report on efforts made to contribute to reducing the global situation...



The screenshot shows the Public Safety Canada website. At the top, there is a navigation bar with the following menu items: National Security, Border Strategies, Countering Crime, Emergency Management, and Resources. A search bar is located on the right side of the navigation bar. Below the navigation bar, the breadcrumb trail reads: Home → Countering Crime → Forced Labour in Canadian Supply Chains. The main heading is 'Forced Labour in Canadian Supply Chains'. The text below the heading explains that forced labour can be found in every country and every sector, and that the International Labour Organization estimates that there are approximately 27.6 million victims of forced labour worldwide. It also mentions that the measures introduced through former Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (the Act), aim to increase industry awareness and transparency and drive businesses to improve practices. Below the text, there are six columns of links and descriptions:

<p><u>Reporting obligations</u></p> <p>Who needs to report, timelines.</p>	<p><u>Prepare a report – Entities</u></p> <p>Process, report requirements, guidance.</p>	<p><u>Prepare a report – Government institutions</u></p> <p>Process, report requirements, guidance.</p>
<p><u>Submit a report</u></p> <p>Complete questionnaire and submit report.</p>	<p><u>Catalogue</u></p> <p>Repository for submitted reports.</p>	<p><u>Canada's response</u></p> <p>Federal initiatives to address forced labour and child labour in global supply chains.</p>

Implications

- Directors engagement
- Statement in P06 : “When a new supplier will be chosen, it will have to sign the independent declaration of disclosure of the respect for law S-211 in its supply chain”.
- Analysis of the state of the situation based on current certificates or origin will be carried out according to the countries at risk;
 - 4 888 certificates in total
 - 165 certificates in risky countries
- Work to obtain a 100 %* commitment from suppliers to commitment



Supplier commitment Certificate of origin at risk



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I, undersigned _____, representative of _____, have familiarized myself with Law S-211 and certify that the products sold to Rousseau Metal Inc. comply with S-2111.

Signed at (city): _____, on (date): _____.

Sincerely,

Name Title Company name Date

Findings to cover :

Certificate region :
Asia/Africa/South America and Latin America

Results YTD (May 2025) :

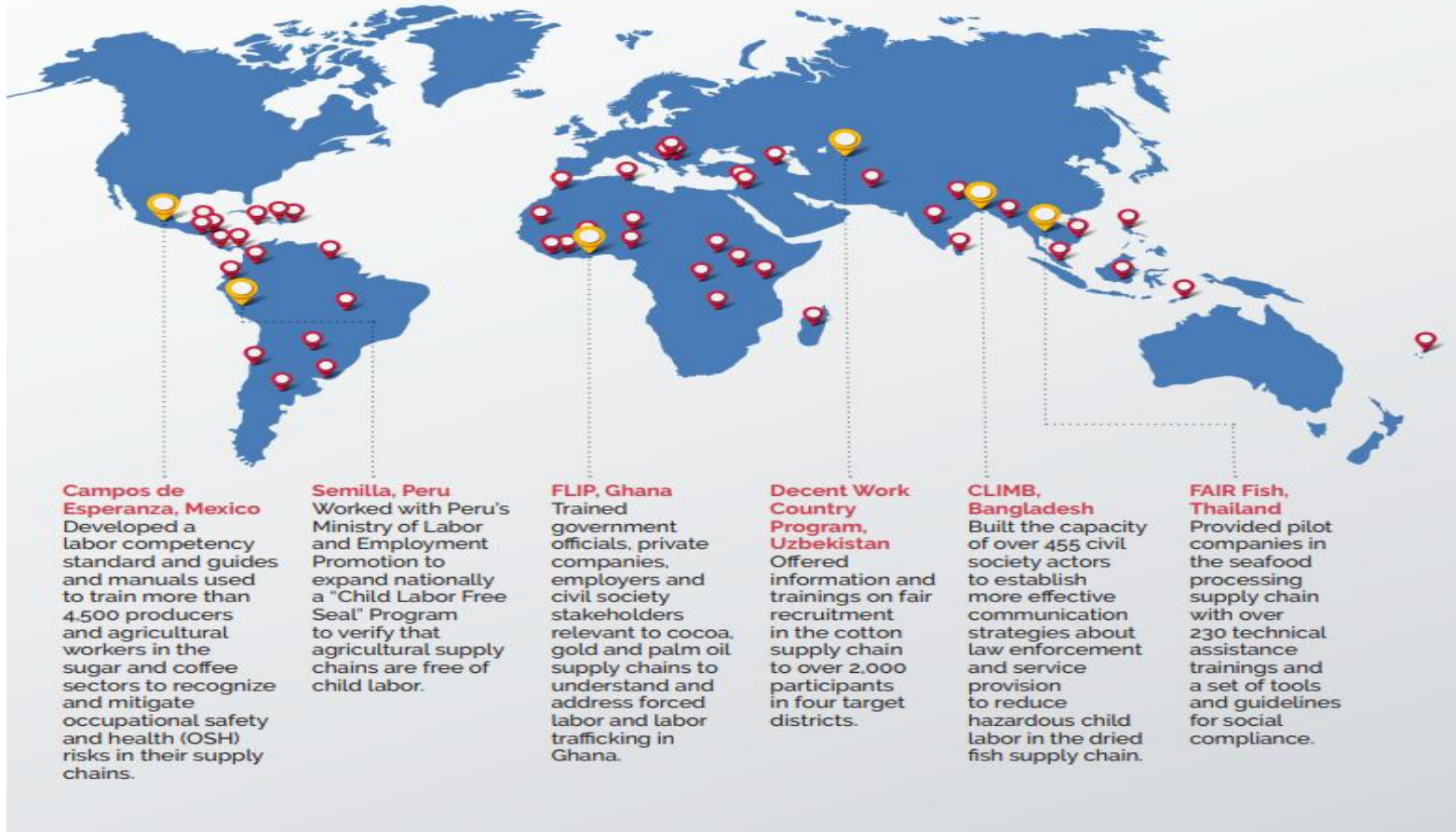
Certificate region :
Asia/Africa/South America and Latin America

172 certificates among 35 suppliers

= 84.30 % of compliance

Company procedures

ILAB funded **59** active projects & initiatives in **53** countries in 2019.



200 targeted products

The 2020 TVPRA List

COUNTRY/AREA	CHILD LABOR	FORCED LABOR	CHILD LABOR & FORCED LABOR
Afghanistan	Carpets, Coal, Poppies, Salt		Bricks
Angola			Diamonds
Argentina	Blueberries, Bricks, Cotton, Garlic, Grapes, Olives, Strawberries, Tobacco, Tomatoes, Yerba Mate (stimulant plant)		Garments
Azerbaijan	Cotton		
Bangladesh	Bidis (hand-rolled cigarettes), Bricks, Footwear, Furniture (steel), Garments, Glass, Leather, Matches, Poultry, Salt, Shrimp, Soap, Textiles, Jute (textiles)		Dried Fish
Belize	Bananas, Citrus Fruits, Sugarcane		
Benin	Granite (crushed)		Cotton
Bolivia	Bricks, Gold, Silver, Tin, Zinc	Cattle, Peanuts	Brazil Nuts/Chestnuts, Corn, Sugarcane
Brazil	Bananas, Beef, Bricks, Cashews, Ceramics, Cocoa, Corn, Cotton, Fish, Footwear, Hogs, Manioc/Cassava, Pineapples, Poultry, Rice, Sheep, Sisal, Tobacco	Garments, Timber	Cattle, Charcoal, Coffee, Sugarcane
Burkina Faso	Granite		Cotton, Gold
Burma	Garments	Palm Thatch, Sesame, Shrimp, Sunflowers	Bamboo, Beans (green, soy, yellow), Bricks, Jade, Rice, Rubber, Rubies, Sugarcane, Teak
Cambodia	Alcoholic Beverages, Bovines, Fish, Manioc/Cassava, Meat, Rubber, Salt, Shrimp, Sugarcane, Textiles, Timber, Tobacco		Bricks
Cameroon	Cocoa		
Central African Republic	Diamonds		

200 targeted products

COUNTRY/AREA	CHILD LABOR	FORCED LABOR	CHILD LABOR & FORCED LABOR
Chad	Cattle		
China		Artificial Flowers, Christmas Decorations, Coal, Fish, Footwear, Garments, Gloves, Hair Products, Nails, Thread/Yarn, Tomato Products	Bricks, Cotton, Electronics, Fireworks, Textiles, Toys
Colombia	Bricks (clay), Coal, Coffee, Emeralds, Fruits (Pome and Stone), Gold, Grapes, Pornography, Sugarcane		Coca (stimulant plant)
Costa Rica	Cattle, Coffee		
Côte d'Ivoire			Cocoa, Coffee
Democratic Republic of the Congo	Cobalt Ore (heterogenite), Copper, Diamonds		Gold, Tantalum Ore (coltan), Tin Ore (cassiterite), Tungsten Ore (wolframite)
Dominican Republic	Baked Goods, Coffee, Rice, Tomatoes		Sugarcane
Ecuador	Bananas, Bricks, Flowers, Gold		
Egypt	Bricks, Cotton, Stones (limestone)		
El Salvador	Baked Goods, Cattle, Cereal Grains, Coffee, Fireworks, Shellfish, Sugarcane		
Eswatini	Bovines		
Ethiopia	Cattle, Gold, Khat (stimulant plant)		Textiles (hand-woven)
Ghana	Cocoa, Gold		Fish, Tilapia (fish)
Guatemala	Broccoli, Coffee, Corn, Fireworks, Gravel (crushed stones), Sugarcane		
Guinea	Cashews, Cocoa, Coffee, Diamonds, Gold		
Honduras	Coffee, Lobsters, Melons		

200 targeted products

COUNTRY/AREA	CHILD LABOR	FORCED LABOR	FORCED LABOR
India	Bidis (hand-rolled cigarettes), Brassware, Cotton, Fireworks, Footwear, Gems, Glass Bangles, Incense (agarbatti), Leather Goods/Accessories, Locks, Matches, Mica, Silk Fabric, Silk Thread, Soccer Balls, Sugarcane, Thread/Yarn		Bricks, Carpets, Cottonseed (hybrid), Embellished Textiles, Garments, Rice, Sandstone, Stones
Indonesia	Footwear (sandals), Gold, Rubber, Tin, Tobacco		Fish, Oil (palm)
Iran	Bricks, Carpets		
Kazakhstan			Cotton
Kenya	Coffee, Fish, Gold, Khat/Miraa (stimulant plant), Rice, Sand, Sisal, Sugarcane, Tea, Tobacco		
Kyrgyz Republic	Cotton, Tobacco		
Lebanon	Potatoes, Tobacco		
Lesotho	Cattle		
Liberia	Diamonds, Rubber		
Madagascar	Mica, Sapphires, Stones, Vanilla		
Malawi	Tea		Tobacco
Malaysia		Electronics, Garments, Rubber Gloves	Oil (palm)
Mali	Cotton, Gold		Rice
Mauritania	Cattle, Goats		
Mexico	Beans (green beans), Cattle, Coffee, Cucumbers, Eggplants, Garments, Leather Goods, Melons, Onions, Poppies, Pornography, Sugarcane, Tobacco		Chile Peppers, Tomatoes
Mongolia	Coal, Fluorspar (mineral), Gold		
Mozambique	Tobacco		

200 targeted products

COUNTRY/AREA	CHILD LABOR	FORCED LABOR	CHILD LABOR & FORCED LABOR
Nepal			Bricks, Carpets, Embellished Textiles, Stones
Nicaragua	Bananas, Coffee, Gold, Gravel (crushed stones), Shellfish, Stones (pumice), Tobacco		
Niger	Gold, Gypsum (mineral), Salt, Trona (mineral)	Cattle	
Nigeria	Gold, Manioc/Cassava, Sand		Cocoa, Granite, Gravel (crushed stones)
North Korea		Bricks, Cement, Coal, Gold, Iron, Textiles, Timber	
Pakistan	Glass Bangles, Leather, Surgical Instruments	Cotton, Sugarcane, Wheat	Bricks, Carpets, Coal
Panama	Coffee, Melons		
Paraguay	Beans, Bricks, Cabbages, Carrots, Corn, Fish, Goats, Hogs, Lettuce, Manioc/Cassava, Melons, Onions, Peanuts, Peppers, Pornography, Poultry, Sesame, Sheep, Stones (limestone), Sugarcane, Sweet Potatoes, Tomatoes, Yerba Mate (stimulant plant)		Cattle
Peru	Bricks, Coca (stimulant plant), Fireworks, Fish	Brazil Nuts/Chestnuts, Timber	Gold
Philippines	Bananas, Coconuts, Corn, Fashion Accessories, Fish, Gold, Hogs, Pornography, Pyrotechnics, Rice, Rubber, Sugarcane, Tobacco		
Russia		Bricks, Timber	Pornography
Rwanda	Tea		
Senegal	Gold		
Sierra Leone	Cocoa, Coffee, Granite, Oil (palm)		Diamonds
South Sudan			Cattle
Sudan	Gold		
Suriname	Gold		

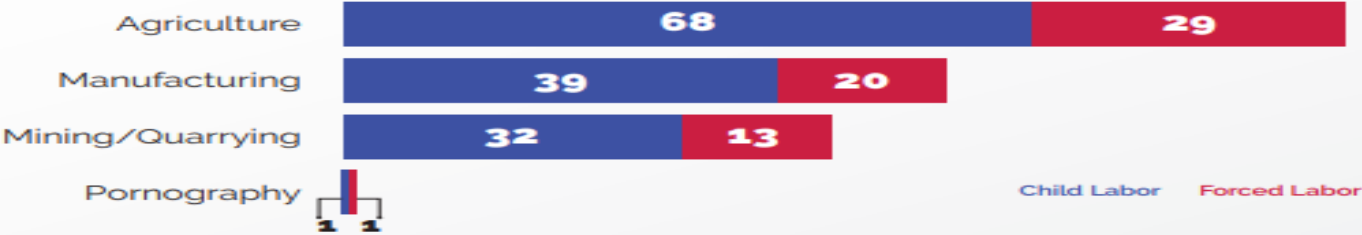
200 targeted products

COUNTRY/AREA	CHILD LABOR	FORCED LABOR	CHILD LABOR & FORCED LABOR
Taiwan		Fish	
Tajikistan			Cotton
Tanzania	Cloves, Coffee, Gold, Nile Perch (fish), Sisal, Tanzanite (gems), Tea, Tobacco		
Thailand	Pornography, Sugarcane	Fish	Garments, Shrimp
Turkey	Citrus Fruits, Cotton, Cumin, Footwear, Furniture, Garments, Hazelnuts, Peanuts, Pulses (legumes), Sugar Beets		
Turkmenistan			Cotton
Uganda	Bricks, Cattle, Charcoal, Coffee, Fish, Gold, Rice, Sand, Stones, Sugarcane, Tea, Tobacco, Vanilla		
Ukraine	Amber, Coal, Pornography		
Uzbekistan		Cotton, Silk Cocoons	
Venezuela		Gold	
Vietnam	Bricks, Cashews, Coffee, Fish, Footwear, Furniture, Leather, Pepper, Rice, Rubber, Sugarcane, Tea, Textiles, Timber, Tobacco		Garments
Yemen	Fish		
Zambia	Cattle, Cotton, Gems, Stones, Tobacco		
Zimbabwe	Tobacco, Sugarcane		

200 targeted products

Figure 3
The List in Numbers

Number of Goods Produced Globally by Production Sector, Disaggregated by Child Labor and Forced Labor



Goods with the Most Child Labor Listings by Number of Countries



Goods with the Most Forced Labor Listings by Number of Countries



Questions