

Forced Labour in Canadian Supply Chains Report

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Vice President and COO, attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.

Jack Frye

Vice President & COO

May 30, 2025



John Arthur Frye

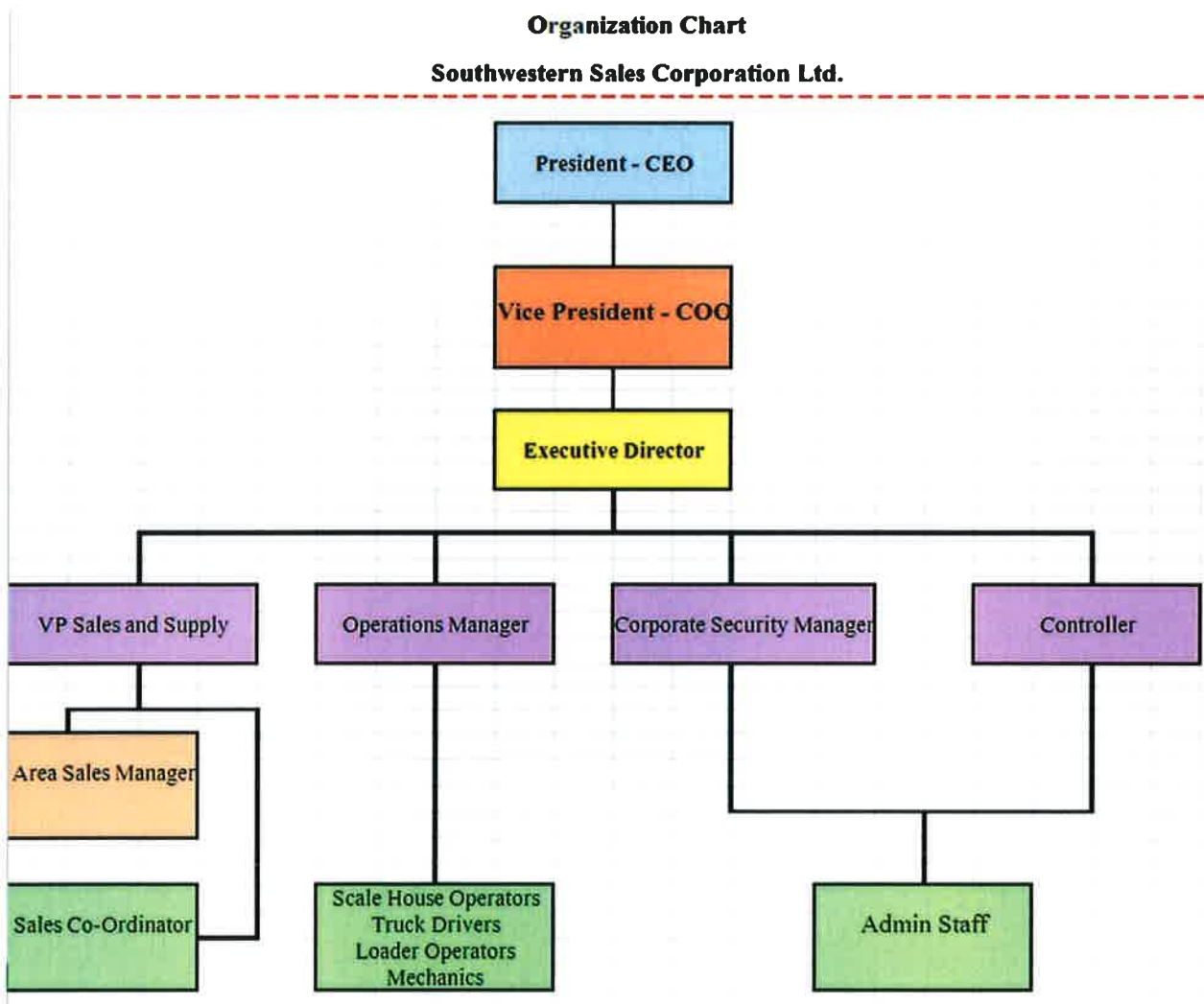
I have the authority to bind Southwestern Sales Corporation Limited

Requirement (a) – Structure, activities and supply chains

Structure:

Legal Structure: Southwestern Sales Corporation Limited

Organizational Structure: See below Organization Chart



Number of Employees: 35

Partner Organizations: Port of Windsor/Windsor Port Authority, Windsor Construction Association, Sarnia Harbour, OSWCA Ontario Sewer and Watermain Construction Association, HCA Heavy Construction Association of Windsor, SHCA Sarnia Heavy Construction Association, CMC Chamber of Marine Commerce, The Marine Club, OSSGA Ontario Stone, Sand & Gravel Association.

Control of Other Entities:

Kingsville Dock – Kingsville, ON

Amherstburg Dock – Amherstburg, ON

Bridgeport Dock – Windsor, ON

West Windsor Dock – Windsor, ON

East Windsor Dock – Windsor, ON

Sombra Dock – Sombra, ON

Sarnia Dock – Sarnia, ON

Owen Sound Dock – Owen Sound, ON

Activities:

Southwestern Sales Corporation Limited is an aggregate supplier to Windsor Essex County, Chatham Kent County, and Lambton County. We supply construction grade material for various projects. Our aggregates are supplied by select quarries and sand pits in Ontario, Canada, Michigan and Ohio, USA.

Volumes of material average 1.8 million tons per year.

Ontario – 100 thousand tons per year

Michigan – 1 million tons per year

Ohio – 700 thousand tons per year

Aggregate is shipped by water or truck to our various docks

Supply Chain:

The quarries we receive our material from outside of Canada are as follows:

Lafarge/Holcim quarries

Marblehead Quarry – Lakeside, OH

Manitoulin Quarry – Manitoulin Island, ON Canada

Carmeuse quarries

Calcite – Rogers City, MI USA

Drummond – Drummond Island, MI USA

Cedarville – Cedarville, MI USA

Port Inland – Gulliver, MI USA

All material that is purchased from the quarries listed above are delivered by vessel directly to our docks. It is then removed from the vessel and placed into specific piles based on material grade.

Requirement (b) – Policies and due diligence processes

Southwestern Sales has a close relationship with our suppliers and follow our supply chain from start to finish. We have site visits and have meetings with our suppliers regularly throughout the year. We take tours of the office and quarries and meet all levels of employees. We have an open dialogue with our suppliers regarding all risks to our employees and how to work together to keep all of our employees safe.

Our suppliers also have on their websites their policies and procedures regarding Human Rights and Child Labour in high-risk supply chains:

Lafarge – Human Rights <https://www.lafarge.ca/en/human-rights>

Carmeuse – Fair Labour Conditions

<https://www.carmeuse.com/na-en/suppliers-code-of-conduct>

Requirement (c) – Forced Labour and Child Risk

As we know child labour risk is still happening in today's workplaces and the sector we work in is listed at a higher risk, we keep lines of communication open between us and our supply chain to understand each other's workforce.

Other controlled entities that we have here at Southwestern Sales Corporation Limited are all unionized employees at our docks and management is present at the dock locations on a regular basis.

Requirement (d) – Remediation measures

Southwestern Sales Corporation limited as assessed that there is no evidence of forced labour or child labour at our facilities or any of the facilities of our suppliers.

Requirement (e) - Remediation of loss of income

As an entity we have judged that vulnerable families have not experienced loss of income as a result of the steps the entity has taken to eliminate forced labour or child labour.

Requirement (f) – Training

Senior Management have been deemed the most appropriate individuals to identify forced and child labour. While no formal outside training has been conducted, participation in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act)* including the “Guidance for Entities”, has been deemed to be sufficient training to meet our needs based on the industry risk.

Requirement (g) – Assessing effectiveness

The annual reporting process as part of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act)* allows for the re-assessment of the effectiveness of the businesses activities and supply chains. To date reviews continue to confirm the effectiveness of the plan.