



# 2025 ANNUAL REPORT

Fighting against forced labour and child labour in supply chains act



# Structure, activities and supply chain

## Structure

Canam Group Inc. (“**Canam Group**”) is a corporation formed and governed by the Business Corporations Act (Quebec) (R.S.Q. chapter S-31.1).

In addition to the teams responsible for manufacturing in factories and construction on sites, Canam Group’s organisational structure is composed of several departments (procurement, credit, sales, insurance, legal, engineering, project management, etc.), which ensure a degree of conformity of the services to be provided at all stages of their activities.

Canam Group employs nearly 3,000 people, mostly located in Canada, but also through subsidiaries in the United States, Romania, India, and the Philippines.

## Activities

Canam Group designs, manufactures, and erects steel structures for commercial, industrial, institutional, and multiresidential buildings. The design is carried out in the form of engineering services and the preparation of drawings or plans. Manufacturing consists of a series of steps involving cutting, drilling, assembling, welding, and painting steel products. Some components are preassembled in the factory. The steel structures are installed on-site, either by subcontractors or by Canam Group teams. The structural components or preassembled parts from the factory are delivered and assembled for building erection.

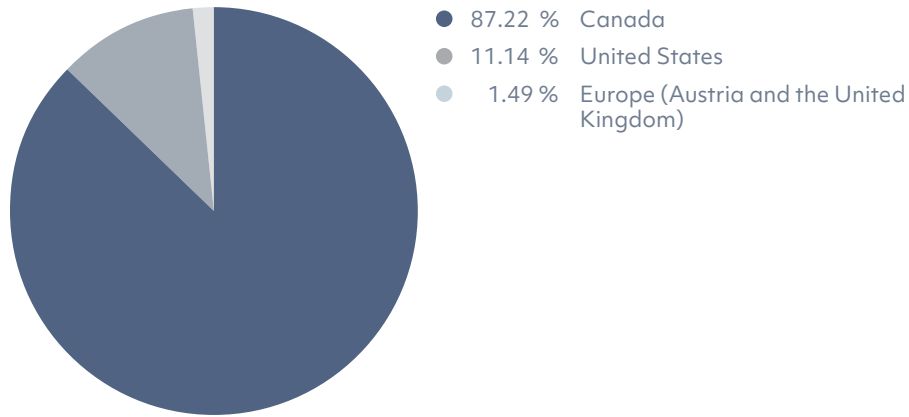


	Joists	Steel Deck	Structure	Detailing, Engineering and Corporate Services
Canada	3 plants	3 plants	4 plants	Yes
United States				Yes
Romania				Yes
India				Yes
Philippines				Yes

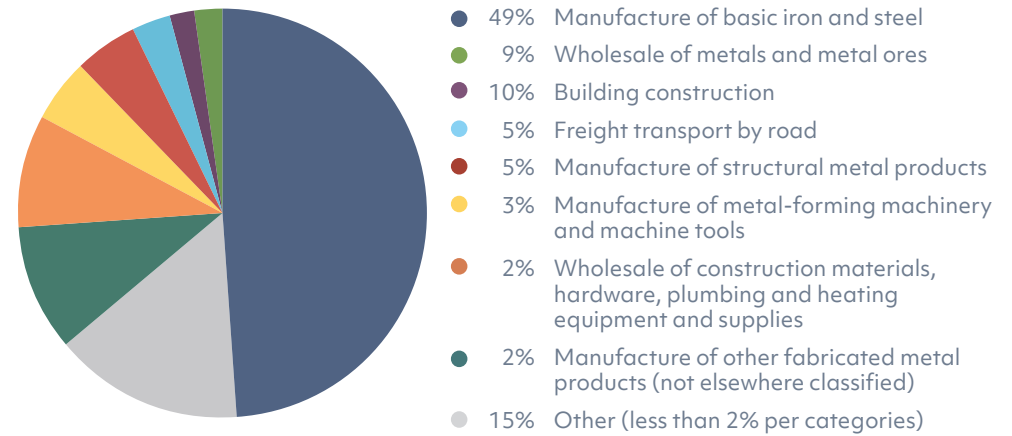
Canam Group operates a total of seven factories located in Canada. It also has, through its subsidiaries, three drawing and shared services offices located in Romania, India, and the Philippines, and business locations in the United States for its American operations.

# Supply chains

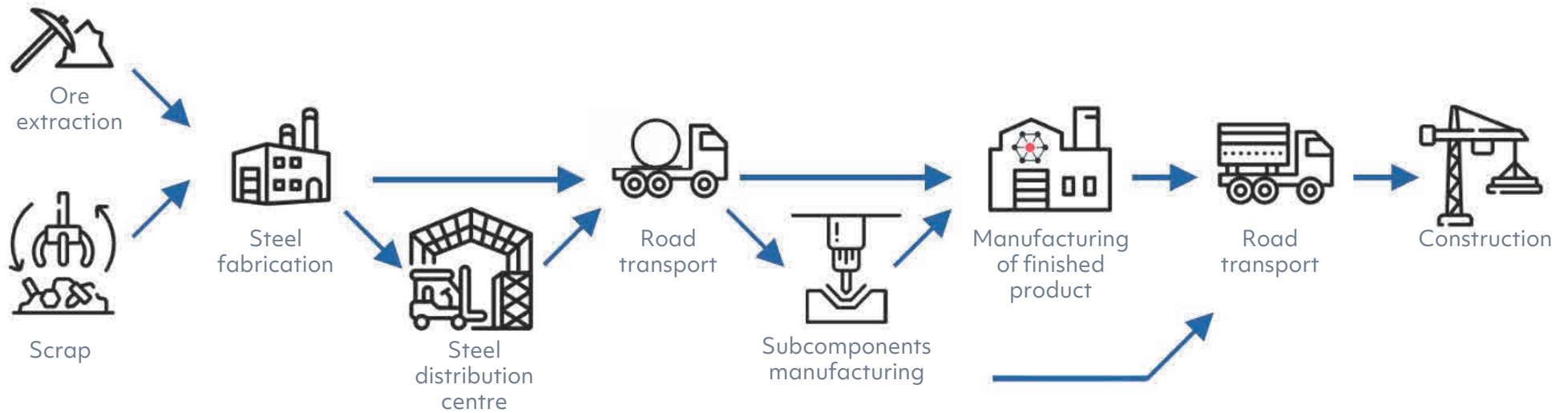
As demonstrated in the following chart and table, Canada is Canam Group's main supplier country. Purchases from Canadian suppliers represent 87.22% of purchasing expenditures (across all product/service categories). The United States accounts for 11.14% of expenditures, and Europe (Austria and the United Kingdom) represents the remaining 1.49%.



Steel purchases represent 58% of the monetary value of Canam Group's purchasing expenditures (products and services). Of this 58%, the vast majority (84%) is purchased directly from steel mills. The other portion (16%) is purchased from distribution centres. The following chart and table demonstrate the distribution of purchasing expenditures by supplier business sectors.



The supply chain of steel purchased by Canam Group begins either with the extraction of minerals or the recovery of steel scrap. The minerals and scrap are then transformed into steel in various shapes. Canam Group primarily purchases steel in coils. These products are either stored in a distribution centre (external to Canam Group) or sent directly to Canam Group's factories or their subcontractors who manufacture subcomponents necessary for Canam Group's operations. Parts manufactured by subcontractors or steel shapes are sent to Canam Group's factories for final fabrication. The components of Canam Group's or subcontractors structures are finally delivered to the construction site for erection, either by our client, by subcontractors, or by Canam Group's erection teams.



## Policy and due diligence process

Since its implementation in 2024, Canam Group Supplier Code of Conduct, published on its website, has governed its relationships with business partners. This code stipulates that suppliers are required to:

1. Refrain from engaging in forced labour practices, including the use of force or threats to compel individuals to work, retaining employees' identity documents, and ensuring that employees receive fair working hours, wages, and benefits in accordance with legal and industry standards.
2. Maintain a strict zero-tolerance policy towards child labour.

Furthermore, clauses enabling Canam Group to better assess supplier risk remain integrated into our standard supply contract templates.

Finally, the inherent risk of forced labor and child labor is maintained as a supplier selection criterion.



# Risk of forced labour and child labour

The subscription to the Sedex database, initiated in 2023, remains a central tool in our strategy to reduce the risk of forced labor and child labor. This platform provides us access to audit reports published by our suppliers who are also Sedex members, as well as various data allowing us to assess the risk level by country, industry sectors, and even at the level of individual suppliers in some cases.

This measure continues to serve as the basis for our actions in reducing the risk of forced labor or child labor. The following data, extracted from Sedex, represents an analysis of the inherent risk associated with the geographic origin and industry sectors of our potential and current partners.



## Risks in the internal activities of Canam Group

Canam Group operates structural steel component manufacturing plants in Canada. It also carries out architecture, engineering, and related technical consulting activities through subsidiaries in Romania, India, and the Philippines. Consequently, the inherent risk within Canam Group's internal operations is moderate in terms of forced labor, and low to moderate with respect to child labor, as demonstrated by the following table:

### Inherent risk according to site activity (from 1 to 10)<sup>1</sup>

	Forced Labour	Child Labour
Canada	4.1	4.1
Romania	4.4	1.9
India	5.6	3.3
Philippines	4.6	3.1

<sup>1</sup> Scale from 1 to 10, 1 being the lowest inherent risk level and 10 the highest.

Following the risk mapping carried out in 2024 for each of its teams, Canam Group strengthened its risk analysis based on the following criteria:

1. Education level required
2. Employment precariousness
3. Location

This analysis allowed Canam Group to identify priority areas where awareness efforts were necessary. In 2026, in accordance with this strategy, training sessions will be deployed for targeted teams to prevent risks related to forced labor and child labor.

## Risks in the supply chains of Canam Group

According to the Sedex database, the combinations of Country-Industry Sectors presenting the highest risks for Canam Group are presented in the following table:

Forced Labour (from 1 to 10) <sup>2</sup>		Child Labour (from 1 to 10) <sup>2</sup>	
Canada - Other human resources provision	5.5	United States - Manufacture of basic iron and steel	5.7
United States - Hazardous waste treatment and disposal	5.0	United States - Manufacture of other non-metallic mineral products	5.7
United States - Short-term accommodation activities	5.0	United States - Manufacture of cordage, rope, twine and netting	5.7

<sup>2</sup> Scale from 1 to 10, 1 being the lowest inherent risk level and 10 the highest.

Suppliers in these categories will undergo further analysis to establish their actual risk levels.

In conclusion, Canam Group did not identify any instances of forced labour or child labour in their activities or supply chains in 2025. Furthermore, based on the data collected, the risk of forced labour or child labour is considered low to moderate.

## Remediation measures

Given that no indications of forced labor or child labor were identified in its operations and supply chains in 2025, Canam Group did not take any remedial action.

## Remediation in case of revenue loss

Given that no indications of forced labor or child labor were identified in its operations and supply chains in 2025, Canam Group did not take any remedial action regarding loss of revenue.



## Training

Raising awareness among Canam Group colleagues is a cornerstone of our strategy to combat the risk of forced labor and child labor. In 2024, a specialised one-hour training session, provided by an external organisation, was attended by teams having a direct or indirect impact on these issues. Specifically, this training helped to deepen the understanding of mechanisms for recognising and identifying potential cases.

Following this initiative, a new training program intended for all colleagues was developed in 2025 and will be deployed company-wide during 2026.

## Evaluation of effectiveness

In order to assess and maintain our efforts in combating the risk of forced labor and child labor in our operations and supply chains, the three structural measures implemented in 2024 remain at the heart of our governance in 2025:

- Firstly, the integration of this risk into Canam Group's operational risk register now allows us to assess and quantify it annually, thereby ensuring a rigorous follow-up of its evolution.
- Secondly, the developed dashboard allows us to track key indicators related to the effectiveness of our measures, particularly in relation to employee awareness levels and the quality of risk data at our supplier level.
- Finally, the annual management review, now well-established, allows for the validation of the actions required in connection with the indicators tracked and for the steering of the continuous improvement of our processes.

## Approval of the report

This report was approved pursuant to subparagraph [11(4)(a)] of the Act by the Board of Directors of Canam Group Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the above mentioned entity. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects, for the purposes of the Act, for the aforementioned reporting year.

I make the above attestation in my capacity as a Chairman of the Board of Directors of Canam Group Inc. for and on behalf of the Board of Canam Group Inc.

I have the authority to bind Canam Group Inc.

A handwritten signature in black ink, appearing to read 'Marcel Dutil', written in a cursive style.

Marcel Dutil  
Chairman of the Board of Directors  
March 25th, 2026