

REPORT: FORCED LABOUR IN CANADIAN SUPPLY CHAINS

North American Steel Equipment Inc.

Location: 300 Hopkins St. Whitby, Ontario, Canada Reporting Year: 2023

Report Details

For entities only: Is this a joint report?

• Yes

If yes, identify the legal name of each entity covered by this report.

| • | North American Steel Equipment Inc. | #74852 2695 |
|---|-------------------------------------|-------------|
| ٠ | North American Storage Equipment | #79998 0727 |
| ٠ | Storrack Mfg | #74997 6692 |
| ٠ | 1209955 (Hi Cube) | #79151 1132 |

What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity?

• Information not available for this reporting period

Describe the entity's activities:

- Manufacturing goods in Canada
- Selling goods in Canada and outside Canada
- Distributing goods in Canada and outside Canada
- Importing into Canada goods produced outside of Canada.

Provide additional information on the entity's structure, activities and supply chains:

- 1. Structure: North American Steel Inc. is registered as a Canadian controlled private Corporation.
- 2. Activity: The Company's main activity is manufacturing industrial shelving and warehouse racking systems. Our manufacturing plants are located in Canada.
- 3. Supply Chains: Our supply chain includes distributors in Canada and outside of Canada.

Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?

• Yes

What elements of the due diligence process has the entity implemented?

- Identifying and assessing adverse impacts in operations, supply chains and business relationships.
- Tracking implementation and results



Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour:

- Our policy states that we are firmly committed to protecting individuals from the exploitations of illegal labour practices, such as child labour, forced labour, slavery, and human trafficking.
- Our company has performed due diligence by requiring our suppliers to complete a questionnaire asking if they are aware of any known forced labour or child labour.



Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?

• Yes, we have begun the process of identifying risks, and are in the final stages of this process.

If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains?

• None at this time of reporting.

Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries?

• No risks identified at this time of reporting.

Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk.

• We have not identified any risks at this time of reporting.

Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?

• Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?

• Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

Does the entity currently provide training to employees on forced labour and/or child labour?

• Yes

If yes, is the training mandatory?

• Yes, the training is mandatory for employees responsible for making contracting or purchasing decisions.



Please provide additional information on the training the entity provides to employees on forced labour and child labour:

• The current training follows the policies outlined in the Fight Against Forced Labour policy and communicated to employees who must sign to confirm understanding of that policy.

Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?

• We currently do not have a process for evaluating the effectiveness of our polices.

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 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.

Tania Fabricius

Full name

VP of Finance & Administration

Title

I have the authority to bind 'North American Steel Equipment Inc.'

Jame Fabricius

Signature

May 29, 2024 Date

