



Report under S-211: Addressing Forced Labour in Supply Chains

1. Introduction

This report constitutes the second annual report for Alliance Steel Corporation ("ASC") under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act") for the fiscal year ended September 30, 2024. The objective of this report is to detail the steps taken during the previous fiscal year to prevent and reduce the risk that forced labour or child labour is used at any step of the production or importation of goods by ASC.

2. Structure, Activities, and Supply Chains

Alliance Steel Corporation is a privately owned Quebec corporation with one location which is at 1060, boul. des Laurentides, Laval (Québec, Canada) H7G 2W1. Alliance Steel Corporation is a metals service center specializing in the processing and distribution of flat rolled carbon steel, Aluminum and stainless steel coils, sheets and plates which we then sell primarily to the Quebec and Ontario markets. Our customers are predominantly manufacturers that operate across various sectors including but not limited to HVAC, transportation and construction. This involves selling large quantities of carbon steel, aluminum and stainless steel that are custom cut to customer specification.

Our supply chain differs according to the type of metal. Steel is produced by Canadian mills in Ontario and is therefore purchased mostly domestically. Aluminum and stainless steel, which are not produced in Canada, are imported by us from the USA or purchased by us from import brokers that import primarily from Asia.

3. Policies and Procedures

During the fiscal year ended September 30, 2024, ASC took steps to formalize and implement policies and due diligence processes to address forced labour and child labour risks:

Policies: ASC developed and formalized a *Human Rights Policy* and a *Supplier Code of Conduct*, which explicitly address forced labour and child labour. Relevant sections concerning compliance with forced labour and child labour standards are being added to ASC's *Purchase Orders*.

Due Diligence Processes: We maintain a centralized supplier approval process. Business is conducted with reputable companies and individuals known to ASC for many years. New suppliers undergo an initial compliance review. This process involves assessments against our *Supplier Certification Statement*.

Supplier certification: We continued requesting our major suppliers to provide a *Supplier Certificate Statement* regarding forced and child labour. This certification requires suppliers to attest to compliance points including:

- a) **Modern Slavery and Child Labour Policy:** Suppliers must agree to comply with the terms and conditions of the *Supplier Certificate Statement* or establish formal policies explicitly addressing modern slavery and human trafficking.
- b) **Communication:** Effective communication of policies and information on forced and child labour to their supply chain.
- c) **Supply Chain Due Diligence:** Processes for identifying, assessing, mitigating and attempting to eliminate risks of forced and child labour.
- d) **Compliance with Legislation:** Adherence to relevant forced labour and child labour legislation and regulations.
- e) **Continuous Improvement:** Ongoing monitoring and enhancement of efforts to combat forced and child labour. The *Supplier Certificate Statement* can be accessed on demand.

4. Risk Assessment

ASC has started the process of identifying parts of its activities and supply chains that carry risks of forced labour or child labour, acknowledging the importance of addressing remaining gaps in the assessment.

Identified Risks: To date, no major risks or instances of forced or child labour have been identified within ASC'S activities or supply chain. The primary area requiring ongoing assessment relates to imported aluminum and stainless steel sourced via import brokers from regions outside North America (e.g., Asia, Europe).

Risk Mitigation: We mitigate risks by dealing with reputable suppliers and brokers known to us. Material traceability is generally available. For imported goods via brokers, risk is mitigated as the mills used by these brokers are often reputable, and many provide statements regarding ethical practices, including those in potentially higher-risk regions. We conduct internal assessments and engage in dialogue with suppliers (including requesting certifications) to evaluate and address potential risks. No new major suppliers were engaged in the fiscal year 2024.

To date, no instances of forced labour or child labour have been identified in ASC's activities or supply chains. Therefore, no remediation measures have been required or undertaken.

5. Steps taken

During the last fiscal year, ASC undertook the following steps, building upon the initiatives planned in the previous year:

- **Implemented Enhanced Supplier Screening:** Utilized the *Supplier Certificate Statement* for major current suppliers. New suppliers undergo a compliance review process. Communicated expectations regarding forced labour and child labour through the Supplier Certification process.
- **Implemented Risk Assessment Tools:** Developed and carried out risk assessment procedures focused on reviewing supplier certifications and available ethical sourcing documentation.
- **Updated and Enforced Ethical Sourcing Policies:** Working on incorporating specific clauses related to forced labour and child labour compliance into *Purchase Orders*.
- **Adopted Zero-Tolerance Policy:** Formalized a zero-tolerance approach within the *Supplier Certification Statement*, outlining consequences for non-compliance.

6. Actions to be Taken

To date, no instances of forced or child labour have been reported within our supply chains. There has been no identification of loss of income for vulnerable families resulting from measures taken to eliminate forced and child labour. However, recognizing that there may be potential risks, we shall continue with the approach established, including due diligence processes and procedures and timely verifications.

These actions aim to continuously enhance ASC's commitment to ethical practices and ensure compliance with the law, thereby strengthening the integrity and transparency of our supply chains.

7. Training

ASC completed initial awareness training with key managers. Further training and awareness materials on forced labour and child labour shall be developed for all employees involved with contracting or purchasing decisions ensuring they understand the risks and ASC's policies and procedures.

8. Monitoring and Effectiveness

ASC has policies and procedures in place to assess the effectiveness of its efforts to ensure forced labour and child labour are not used in its activities and supply chains. Methods include:

- Periodic internal reviews of supplier compliance documentation (e.g., certifications).
- Tracking supplier responses and adherence to the *Supplier Code of Conduct / Certification Statement*.
- Ensuring key personnel involved in hiring and procurement are aware of and adhere to ASC's ethical standards and policies.

Effectiveness assessment is an ongoing process, and ASC will continue to refine its methods.

Approval and Attestation

In compliance with the requirements of the Act, specifically section 11, I hereby attest that I have thoroughly reviewed the information contained in this report. Exercising reasonable diligence, I confirm that the information presented is true, accurate, and complete in all material respects for the purposes of the Act for the reporting year specified above. I have the authority to bind Alliance Steel Corporation.

We reserve the right to amend this report upon receipt of additional information.

Full Name: Glenda Susser

Title: President

Date: May 21, 2025

Signature: **GLEND A SUSSE R**
