



## ANNUAL REPORT Bill S-211

### PURPOSE

This report has been created by Coilplus Canada Inc. ("**Coilplus Canada**" or the "**Company**") for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the "**Act**"). The report outlines the approach and initiatives taken by Coilplus Canada to identify and address the risks of forced labour and child labour in its business operations and supply chains in the 2024 financial reporting year.

### COMMITMENT

Coilplus Canada is committed to preventing and reducing the risk that forced labour or child labour is used in the production of the goods it sells to its customers that are used in Canada and globally.

### STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Coilplus Canada's operations, which are located in Ingersoll, Ontario, involve steel procurement from local and offshore mills, slitting, supplying, and delivering processed steel to both automotive and non-automotive Original Equipment Manufacturers (OEMs) and other customers.

#### *i) Structure and Activities*

Coilplus Canada is a corporation incorporated under the *Canada Business Corporations Act*. The Company is part of the Coilplus group, which is comprised of ten entities that have business operations across North America. Coilplus Canada, however, does not control or have any subsidiary companies.

In terms of its activities, Coilplus Canada operates a steel service centre that processes flat rolled steel that is then sold to various industries and customers who are based inside and outside of Canada. The Company is also engaged in the distribution of goods, inside and outside of Canada, as well as the importation of goods into Canada that are produced outside the country.

#### *ii) Supply Chain*

The goods produced outside Canada that are used in the processing of Coilplus Canada's steel products, in coil or blank form, include stainless steel, carbon steel, and aluminum. These materials are purchased within the regions of North America, continental Europe, Africa, and Asia and are then imported into Canada. The Company's supply chain also includes ancillary services that contribute to Coilplus Canada's main production operations, such as transporters and carriers who operate across North America.

### ***iii) Steps Taken by Coilplus Canada***

To prevent and reduce the risk of forced labour or child labour in the production of goods and in its supply chain, Coilplus Canada updated and implemented a revised version of its Code of Conduct and an Excess Hours of Work Agreement. The Company also implemented a Modern Slavery Policy and a Supplier Code of Conduct, both of which specifically address forced labour and child labour.

In addition, Coilplus Canada provides its suppliers with a questionnaire that they are required to complete along with the Certificate of Origin. The questionnaire requires the supplier to confirm they do not use forced labour in any stage of manufacturing the goods that are sold to Coilplus Canada.

Finally, Coilplus Canada undertook a risk assessment on products identified by the International Labour Organization (ILO) as high-risk commodities and their country of origin to determine if any of these goods were being imported by the Company. Based this review, the Company did not identify any high-risk products that are being imported into Canada at this time.

## **POLICIES AND DUE DILIGENCE PROCESSES**

Coilplus Canada has due diligence processes in relation to forced labour or child labour, including embedding responsible business conduct into policies and management systems. In its previous financial year, the policies and processes that Coilplus developed and maintained to help manage potential forced labour and child labour risks within the business and its supply chain include:

1. A Code of Conduct that requires all officers and employees of Coilplus Canada to comply with all applicable laws, rules, and regulations where they operate, international standards and rules, and all internal corporate rules and policies. Coilplus Canada's internal rules and policies include:
  - (i) maintaining and improving systems and processes to avoid any human rights violations related to the Company's operations, supply chain, and products;
  - (ii) fully supporting domestic and international efforts to end all forms of forced labour, human trafficking, and modern slavery.
2. An Excess Hours of Work Agreement which provides that workers who work excess hours do so voluntarily. Under the Agreement, workers voluntarily agree to work up to a maximum of 12 hours per day and 60 hours per week. In such cases, Coilplus Canada will pay employees overtime pay in accordance with Ontario's *Employment Standards Act, 2000*. Employees are permitted to terminate their Excess Hours of Work Agreement on two weeks' notice.
3. A Driver's License and Insurance Declaration which requires Coilplus Canada employees that use company vehicles to have a valid driver's license. This identification measure is



a process that Coilplus Canada has in place to identify and ensure that employees are of the age at which they may obtain a driver's license.

4. A Supplier Code of Conduct founded on the Ten Principles of the UN Global Compact in conjunction with the United Nations Guiding Principles on Business and Human Rights, the eight Fundamental Conventions of the International Labor Organization, and the International Bill of Human Rights. The Supplier Code of Conduct mandates that all employees must be at least the minimum legal working age as defined by local laws, or at least 15 years old where no legal minimum is specified. It also prohibits individuals under the age of 18 from engaging in hazardous work. The Supplier Code of Conduct further requires that all employment be voluntarily, with a prohibition on the use of forced labour. Under the Supplier Code on Conduct, Coilplus Canada reserves the right to terminate the relationship with any supplier and/or facility that does not comply with its provisions.
5. A Modern Slavery Policy which came into force on September 6, 2024, and applies to all persons working for Coilplus Canada or on its behalf in any capacity. The Modern Slavery Policy requires the Local Compliance Officer to monitor and prevent the importation of products manufactured using forced labour. This includes developing appropriate materials and preparing measures to remediate any instances of forced labour that may be identified. Under the Modern Slavery Policy, management is also responsible for supporting the gathering of information to identify risks of potential use of forced labour in the Company's supply chains. Any individual to whom this policy applies who is found to be in breach of its provisions may be subject to disciplinary action, up to and including termination for cause. Furthermore, Coilplus Canada reserves the right to terminate any business relationship with any party that violates the terms of this policy.
6. A Whistleblowing Policy which seeks to protect employees from reprisal, including reprisals related to forced and child labour. Coilplus Canada's hotline is available to all employees and allows them to confidentially report ethical concerns.

## **FORCED LABOUR AND CHILD LABOUR RISKS**

Coilplus Canada has started the process of identifying parts of its activities and supply chains that may carry a risk of forced labour or child labour, including through the supplier questionnaire and risk assessment outlined above.

## **REMEDATION MEASURES**

Coilplus Canada has not identified any forced labour or child labour in its activities or supply chains. As such, the Company has not undertaken any remediation measures.

## REMEDICATION OF LOSS OF INCOME

Coilplus Canada has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, the Company has not taken any remediation measures related to income loss.

## TRAINING PROVIDED TO EMPLOYEES

Coilplus Canada provides regular employee training, including with respect to safe and legally compliant workplace practices and policies. Training on the Company's updated Code of Conduct, including the forced labour provisions, and Excess Hours of Work Agreement are mandatory for all employees. Going forward, Coilplus Canada is in the process of assessing what other forced labour and child labour-related training may be appropriate, with a particular focus on training for the Company's procurement team.

## ASSESSING EFFECTIVENESS

Coilplus Canada does not currently have specific policies and procedures in place to assess its effectiveness in reducing or eliminating the risk of child labour or forced labour in its activities and supply chains. The Company will be considering what methods of assessment may be appropriate for subsequent reporting years.

## APPROVAL AND ATTESTATION

In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for the entity listed above. Based on our knowledge, and having exercised reasonable diligence, we 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.

IN WITNESS WHEREOF the authorized signing officer(s) of Coilplus Canada Inc. have executed this report as of the effective date of the signatures set out below.

### SIGNED

May 27, 2025  
Date

27 May 2025  
Date

May 29 2025  
Date

### COILPLUS CANADA INC.

Per: [Signature]  
Name: Will Hamilton  
Title: Director

Per: [Signature]  
Name: Jeff Bastien  
Title: Director

Per: [Signature]  
Name: Yasuhiro Kano  
Title: Director

5/27/2025  
Date

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Per: 

Name: Joe Kaspar

Title: Director

We have authority to bind Coilplus Canada Inc.