



## Report on Bill S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”)

1. This report is for which of the following?

Entity

Government institution

2. Legal name of reporting entity or government institution

Combined Metal Industries Inc.

3. Financial reporting year

1 November 2022 to 31 October 2023

4. Is this a revised version of a report already submitted this reporting year?

Yes

No

5. For entities only: Business number(s):

894026483

6. For entities only: Is this a joint report?

Yes

No

7. For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?

Yes

No

8. For entities only: Which of the following categorizations applies to the entity? Select all that apply.

Listed on a stock exchange in Canada

Canadian business presence (select all that apply):



- Has a place of business in Canada
- Does business in Canada
- Has assets in Canada
- Meets size-related thresholds (select all that apply):
  - Has at least \$20 million in assets for at least one of its two most recent financial years
  - Has generated at least \$40 million in revenue for at least one of its two most recent financial years
  - Employs an average of at least 250 employees for at least one of its two most recent financial years

**9. For entities only: Which of the following sectors or industries does the entity operate in? Select all that apply.**

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services



- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- Other, please specify: Metal Recycling

**10. For entities only: In which country is the entity headquartered or principally located?**

Canada

**10.1 If in Canada: In which province or territory is the entity headquartered or principally located?**

Ontario

**Annual Report**

**Reporting for entities**

**1. 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? Select all that apply.**

- Mapping activities
- Mapping supply chains
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Conducting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Developing and implementing an action plan for addressing forced labour and/or child labour
- Gathering information on workers recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains.



- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains.
- Developing and implementing child protection policies and processes
- Developing and implementing anti-forced labour and/or -child labour contractual Clauses
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Auditing suppliers
- Monitoring suppliers
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
- Developing and implementing grievance mechanisms
- Developing and implementing training and awareness materials on forced labour and/or child labour
- Developing and implementing procedures to track performance in addressing forced labour and/or
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour
- Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks
- Information not available for this reporting period
- Other, please specify:

**2. Please provide additional information describing the steps taken.**

Combined Metal Industries Inc. ("CMI") has designed recruitment and people management processes such that all prospective employees are legally entitled to work in Canada. We are steadfastly committed to abiding by the employment laws in Canada to ensure our employees are protected from any abuse or coercion.

No labour provided to CMI in its operations is obtained by means of forced labour or child labour.

Our policies and processes ensure equitable, diverse, and accessible workplace and include specific policies on non-discrimination, health and safety and anti-bribery. We are dedicated to eradicating any contraventions of these policies from our business, supply chains and operations.



**3. Which of the following accurately describes the entity's structure?**

- Corporation
- Trust
- Partnership
- Other unincorporated organization

**4. Which of the following accurately describes the entity's activities? Select all that apply.**

- Producing goods (including manufacturing, extracting, growing and processing)
  - in Canada
  - outside Canada
- Selling goods
  - in Canada
  - outside Canada
- Distributing goods
  - in Canada
  - outside Canada
- Importing into Canada goods produced outside Canada
- Controlling an entity engaged in producing, selling or distributing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada.

**5. Please provide additional information on the entity's structure, activities and supply chains.**

Founded in Toronto Canada in 1996, CMI has quickly grown into a successful full-service metal recycling corporation. CMI is recognized as a leading and innovative recycler and distributor of metal products, thanks to the efforts of a passionate and dedicated team of people who drive success every day.

CMI services a strong core customer base in Canada with a presence in all Ferrous and Non-Ferrous markets across North America. As a leading partner to the Canadian manufacturing industry, CMI is transforming the Canadian marketplace with best environmental and quality management practices in all our processes and facilities.

With respect to purchased goods, CMI's supply chains consist of 3 unique sectors; Industrial Manufacturing, Dealers and the General Public. These suppliers are primarily located in North America and play a key role in our ability to enhance the circular economy and facilitate the



reuse of metals. In addition to our metal procurement, CMI has an extensive network of North American individuals and entities that provide services in connection with our core business.

Our supply chains play a vital role in our ability to achieve our ESG goals. To that end, we focus on working with partners who share our commitment to the highest standards of business conduct.

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

Yes

No

**6.1 If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply.**

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate

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

To the best of our knowledge, the procurement of metals and services occurs predominantly within North America and hence has a low risk of forced labour and child labour. We have not been made aware of any use of forced labour or child labour in our supply chains.

**8. 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 identified risks to the best of our knowledge and will continue to strive to identify emerging risks.

Yes, we have started the process of identifying risks, but there are still gaps in our assessments.

No, we have not started the process of identifying risks.

**8.1 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? Select all that apply.**

The sector or industry it operates in



- The types of products it produces, sells, distributes or imports
- The locations of its activities, operations or factories
- The types of products it sources
- The raw materials or commodities used in its supply chains
- Tier one (direct) suppliers
- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour
- The use of forced labour
- The use of child labour
- None of the above
- Other, please specify

**9. 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? Select all that apply.**

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries



- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration
- None of the above
- Other, please specify: Metal Recycling

**10. 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.**

To the best of our knowledge, the procurement of metals and services occurs predominantly within North America and hence has a low risk of forced labour and child labour. We have not been made aware of any use of forced labour or child labour in our supply chains.

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

- Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.
- No, we have not taken any remediation measures.
- Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

**12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour.**





This section is not applicable.

**13. 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?**

Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.

Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

No, we have not taken any remediation measures.

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.

**14. Please provide additional information on any measures the entity has taken 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.**

This section is not applicable.

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

Yes

No

**16. Please provide additional information on the training the entity provides to employees on forced labour and child labour.**

Whilst we do not currently provide specific training on forced labour and child labour, CMI acknowledges its responsibilities in respect of the Act and has a zero-tolerance policy towards forced labour and child labour.

Should CMI identify participants in its supply chain that knowingly support or found to be involved in forced labour and/or child labour it will refrain from doing business with such entities.

**17. 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?**

Yes

No

**18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.**

This section is not applicable.



## Attestation

In accordance with the requirements of the Act, and in particular Section 11 thereof, I attest that the Board of Directors of Combined Metal Industries Inc. has reviewed the information contained in this report. 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 reporting year listed above.

DocuSigned by:

*David Herr*

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Name: David Herr

Title: Chief Financial Officer

Date: May 30, 2024

## Contact Us

If you have any inquiries concerning the 2024 Fighting against forced labour and child labour in supply chains report, please contact [sustainability@combinedmetal.com](mailto:sustainability@combinedmetal.com)