

## **Introduction**

The following Joint Report has been produced by Extrudex Aluminum Corp. (“**Extrudex ON**”) and Extrudex Aluminum (Quebec) Inc. (“**Extrudex QC**”) (collectively referred to as the “**Reporting Entities**”) for the financial year ending October 31, 2023 (the “**Reporting Period**”).

This Report is the first to be produced by the Reporting Entities pursuant to Canada’s newly adopted *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”).

This Report highlights and explains steps taken by the Reporting Entities to prevent and reduce the risk of child labour and forced labour being present in any step of the production, importation and sale of goods in Canada or elsewhere.

The Reporting Entities are committed to preventing and reducing the risk of forced labour or child labour anywhere in our supply chains. As part of this commitment, the Reporting Entities have begun the process of developing formal policies as well as a standard diligence and supplier certification process to systemically screen for forced and child labour risks in our supply chain.

## **Structure & Activities**

The Reporting Entities are privately owned corporations that manufacture aluminum extrusions in both standard and custom shapes at plants in Ontario and Quebec.

Aluminum extrusions are produced by heating an aluminum billet and pushing that billet through a standard or custom die using a hydraulic press. Our aluminum extrusions are used in building and construction applications as well as in transportation, electrical and consumer durable applications.

Extrudex ON was founded in 1980 and incorporated in 1981. In 1994, Extrudex ON expanded to create Extrudex QC.

Our head office and main production plant are located in Woodbridge, ON. Our Quebec Plant is located in St-Nicholas, Quebec.

The Reporting Entities are both privately owned. The same ownership group owns a production facility in Ohio, USA, Extrudex Aluminum Inc. Extrudex Aluminum Inc. does not have a place in Canada, do business in Canada or have assets in Canada.

## **Our Policies and Training on Countering, Reporting and Detecting Forced and Child Labour**

The Reporting Entities did not have policies or training requirements in place in our most recently completed financial year.

We have identified a need to develop and implement formal policies addressing forced and child labour directly as well as a standard diligence and supplier certification process to systemically screen for forced and child labour risks in our supply chain.

### **Parts of our Supply Chain that Carry Risk of Forced or Child Labour**

For the purpose of preparing this report, we have conducted a review to identify the parts of our business and supply chain that carry a risk of forced or child labour. In order to identify and assess risk, we have relied on broadly accepted and reputable tools including:

- a) the “Responsible Sourcing Tool”, which is the result of a collaboration between Verité, and independent civil society organization, and the U.S. Department of State’s Office to Monitor and Combat Trafficking in Persons;<sup>1</sup>
- b) the US Bureau of International Labour Affairs “Better Trade Tool”;<sup>2</sup>
- c) the Uyghur Forced Labour Prevention Act (“UFLPA”) Entity List;<sup>3</sup>
- d) the Withhold Release Orders and Findings List published by the US Customs and Border Protection Agency;<sup>4</sup>
- e) the “KnowTheChain” organisation website and reports;<sup>5</sup> and
- f) certifications by the Aluminum Stewardship Initiative.<sup>6</sup>

Given the nature of our production process, aluminum billets (also referred to as aluminum logs) are the primary input that is purchased by the Reporting Entities.

The other inputs sourced by the Reporting Entities include tooling, paint, chemicals and packing materials.

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<sup>1</sup> Responsible Sourcing Tool, “Identify Risks in Your company’s Global Supply Chains”, available online: <https://www.responsiblesourcingtool.org/>.

<sup>2</sup> US Bureau of International Labour Affairs “Better Trade Tool”, available online: <https://www.dol.gov/agencies/ilab/better-trade-tool>.

<sup>3</sup> U.S. Department of Homeland Security, “Uyghur Forced Labor Prevention Act (UFLPA) Entity List”, 14 May 2024. See <https://www.dhs.gov/uflpa-entity-list>.

<sup>4</sup> U.S. Customs and Border Protection, “Withhold Release Orders and Findings List”, 12 April 2024. The Withhold Release Orders and Findings are issued by the Commissioner and are published in the Federal Register. See <https://www.cbp.gov/trade/forced-labor/withhold-release-orders-and-findings>.

<sup>5</sup> KnowTheChain, “Company List”. See <https://knowthechain.org/company-list/>.

<sup>6</sup> See: <https://aluminium-stewardship.org/drive-change/sustainability-priorities/human-rights>.

## **1) Aluminum**

Below is a summary of how we evaluate risks in our supply chain.

### *a) Country risk*

The Reporting Entities source aluminum billets from Canada as well as from foreign countries.

Our research and experience supports that Canada is a low-risk jurisdiction for the presence of forced labour and child labour.

Certain foreign countries from which the Reporting Entities source imported aluminum billets possess varying risks associated with forced labour.

According to the Responsible Sourcing Tool, human trafficking has been a major concern in certain of these countries. The US Bureau of International Labour Affairs, via its Better Trade Tool, has also confirmed the risk of child, forced and forced child labour in the aforementioned countries on a continual basis since 2009.<sup>7</sup>

### *b) Product risk*

According to the Responsible Sourcing Tool, the extractives, mining and metal sectors generally possess the following risk factors:

- Hazardous/undesirable work
- Vulnerable, easily replaced, and/or low-skilled workforce
- Migrant workforce
- Presence of labour contractors, recruiters, agents or other middlemen in labour supply chain
- Long, Complex, and/or non-transparent supply chains

While we have identified risk associated with the countries from which we sourced aluminum billets, our research indicates that these risks do not relate to the metals sector specifically, but rather to other sectors including construction, domestic work, agricultural products and cotton.<sup>8</sup>

### *c) Supplier risk*

Given the country risk associated with the countries from which we have sourced aluminum, we took steps to examine whether our suppliers have any connections to forced labour or child labour. Our conclusion is that our suppliers do not engage in forced or child labour.

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<sup>7</sup> According to the Responsible Sourcing Tool as well as the US Bureau of International Labour Affairs “Better Trade Tool”.

<sup>8</sup> Based on country reports produced by the US Better Trade tool and the Responsible Sourcing Tool.

First, we have reviewed certifications for the major aluminum producers in the countries in question by the ASI, an environmental, social and governance (ESG) standards organization. As part of its certification process, ASI monitors and audits conformance with core ILO rights, including forced labour and child labour. Major producers in each country that the Reporting Entities sourced from have been audited and certified by ASI.

Second, our research indicates that none of these suppliers have been flagged in any published lists or third-party databases documenting supply chain risks, such as the UFLPA Entity List, the Withhold Release Orders and Findings List published by the US Customs and Border Protection Agency and the “KnowtheChain” organisation website or reports.

## **2) Other goods**

Other goods account for a minority of our supply chain and are sourced from low-risk jurisdictions.

We have screened our largest suppliers accounting for approximately 95% of our annual spend on products and services. None of these suppliers have been flagged for any involvement with or connection to forced or child labour by the above-noted lists and due diligence tools.

## **Due Diligence**

In addition to the research and screening noted above, the Reporting Entities reviewed documentation and contacted suppliers where necessary to confirm the origin of the goods that we purchased.

We are continuously monitoring these aforementioned resources to ensure that none of our suppliers are flagged.

## **Measures Taken to Remediate any Forced Labour or Child Labour**

No such measures have been required.

## **Self-Assessment of Effectiveness**

In our most recently completed financial year, no actions were taken by the Reporting Entities to assess their effectiveness in preventing and reducing risks of forced labour and child labour in their activities and supply chains.

**Attestation**

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. 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.

Signed by:

Signature

Andrew Gucciardi  
Chief Executive Officer  
Extrudex Aluminum Corp.

Date     **05/30/2024**

I have the authority to bind Extrudex Aluminum Corp. and Extrudex Aluminum (Quebec) Inc.