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ANNUAL REPORT Bill S-211

This report is made pursuant to Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**"). The report outlines the approach and initiatives taken by Janco Steel Ltd. ("**Janco Steel**") to identify and address the risks of forced labour and child labour in its business operations and supply chains in the 2025 financial reporting year.

Our Commitment

Janco Steel 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, who are located exclusively in Canada and the United States. The company relies on ethical business practices and operates in compliance with national and international labour standards.

Organizational Structure, Activities, and Supply Chains

Janco Steel is a steel processing company operating in the manufacturing sector, with locations in Stoney Creek and Wellesley Township, Ontario. The company currently employs 320 workers.

Janco Steel buys steel coils from steel mills and other suppliers that are primarily located in Canada. The company has suppliers that are located in other countries, including the United States, Taiwan, Turkey, and Germany. It then processes these materials into steel products that are sold in Canada and the United States.

Janco Steel is also aware that the origins of some of the material bought from vendors includes, China.

Policies and Due Diligence Processes

Janco Steel maintains workplace policies to help ensure there is no forced or child labour in its supply chain. This includes procedures that prohibit hiring local employees who are below the legal working age.

The company also maintains an hours-of-work policy and a recruitment policy that are consistent with the Ontario *Employment Standards Act, 2000*. In addition, Janco Steel requires any onsite contractors to attest to their compliance with all applicable employment laws.

All supplies purchased by Janco Steel are bought from suppliers from reputable countries.

Steps Taken

Janco Steel has ensured that all its domestic purchasing, which makes up the vast majority of its supply chain, is doing their due diligence in regards to having no forced or child labour in their supply chain.

Forced Labour and Child Labour Risks

Moving forward, Janco Steel will be working to identify specific risks of forced labour and child labour that may exist in its supply chain.

Remediation Measures

Janco Steel 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.



Remediation of Loss of Income

Janco Steel 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, it has not taken any income remediation measures.

Training Provided to Employees

In 2025, Janco Steel did not provide training to its employees specific to forced labour or child labour. Janco Steel is currently in the process of assessing what forced labour and child labour-related training may be appropriate for its workforce.

Effectiveness Assessment

Janco Steel assesses its effectiveness in preventing the use of forced labour and child labour through periodic review of its internal employment practices and supplier relationships. This includes ensuring compliance with applicable employment standards legislation, maintaining recruitment and hiring controls that prohibit underage employment, and requiring onsite contractors to attest to compliance with relevant labour laws.

The entity recognizes that its current assessment approach is primarily qualitative and continues to evaluate opportunities to strengthen how effectiveness is measured over time as part of its ongoing compliance efforts.

Approval and 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 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.

IN WITNESS WHEREOF the authorized signing officer(s) of Janco Steel Ltd. have executed this report as of the effective date of the signature set out below.

SIGNED

) **JANCO STEEL LTD.**
)

May 21, 2026

) **Original copy signed and**
) **maintained on site**
)

Date

) _____
) **Name:** Richard Nordeman
) **Title:** Director of People, Safety and Wellbeing
) I have authority to bind Janco Steel Ltd.
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