# 2024 Report on compliance with Fighting Against Forced Labour and Child Labour in Supply Chains Act

Dajcor Aluminum Ltd.

155 Irwin Street

Chatham, Ontario

N7M 0N5

Bus No. 815467055 RT 0001

Reporting year - 2024 (No Revisions)

This report outlines Dajcor Aluminum Ltd.'s ("Dajcor Aluminum") efforts to ensure compliance with Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") and its commitment to ethical sourcing practices in its supply chain. The report highlights steps taken in the previous financial year, including the implementation of an ESG Committee, plant wide training in the areas of forced labour and child labour, creation of a forced labour policy, a human rights policy, and expansion of required declarations from all vendors on the Approved Supplier List. The Report also discusses the identification of risk areas in the supply chain and evaluation of those vendors based on their human rights policies and reports.

## Structure, Activities and Supply Chain

Dajcor Aluminum is incorporated pursuant to the laws of the Province of Ontario and is the leading Canadian supplier of extruded, fabricated/machined and anodized aluminum components and assemblies to various markets. It manufactures aluminum extrusion in Canada and the United States of America and purchases aluminum billet domestically from third parties that may import aluminum from Europe and South Asia.

## Policies and Due Diligence Processes

Dajcor Aluminum has embedded responsible business conduct into its policies and management systems.

Supplier Code of Conduct

Dajcor Aluminum has a detailed Supplier Code of Conduct that outlines the ethical standards and expectations for suppliers. This code covers areas such as labor practices, environmental sustainability, and business integrity. Suppliers on the approved supplier list for Dajcor are required to adhere to these standards as a condition of doing business with Dajcor Aluminum.

# Supplier Declaration

To ensure transparency and accountability, at risk suppliers are asked to complete a Supplier Declaration confirming their compliance with Dajcor Aluminum's Supplier Code of Conduct. This declaration serves as a formal acknowledgment of their commitment to ethical business practices. In 2024 this was expanded to include all vendors on the Dajcor Approved Supplier List.

## Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

# Supplier Onboarding Process

Dajcor Aluminums' critical supplier onboarding process includes a thorough assessment of potential suppliers' adherence to ethical standards. This includes conducting background checks, reviewing past performance, and verifying compliance with regulatory requirements for high-risk vendors.

## Supplier Review Process

The critical supplier review process includes a rigorous evaluation of suppliers' human rights policies and reports. At risk suppliers are assessed based on their efforts to prevent and reduce the risks of forced labor, discrimination, and child labor. Suppliers that do not meet these standards may be subject to further review or termination of the business relationship.

# Supplier Selection

Dajcor Aluminums' process for selecting critical suppliers prioritizes ethical sourcing practices. In addition to considering factors such as cost, quality, and reliability, suppliers are evaluated based on their commitment to social responsibility, environmental sustainability, and human rights.

#### Adherence to Local Laws and Policies

Dajcor Aluminum complies with the laws of the Province of Ontario. 2024 saw the implementation of our Human Rights Policy, Forced Labour Policy and ESG Policy. Worker awareness training was conducted to include these new policies.

#### Forced Labour and Child Labour Risks

# Risk Assessment in the Supply Chain

Dajcor Aluminum has identified forced labour and child labour risks in its Raw Material (Aluminum) suppliers. These suppliers were identified as risks due to their geographical regions and industries that have historically inadequate labor protections, potential for forced labor, and limited oversight of working conditions. Efforts are ongoing to mitigate these risks through enhanced due diligence and collaboration with reputable suppliers.

#### Remediation Measures

To date we have not identified any forced labour or child labour in our own production or those of our existing suppliers and therefore no remediation measures have been necessary, nor have we identified any loss of income to those most vulnerable.

## **Training on Forced Labor**

At Dajcor, all employees are trained in the areas of discrimination and workplace harassment. In 2024, Dajcor Aluminum provided additional training to all workers as it rolled out Human Rights, Forced Labour, and ESG Policies.

# **Assessing Effectiveness**

To assess effectiveness, Dajcor Aluminums' annual critical supplier review includes sustainability indicators for tracking vendor performance. In 2024, at risk suppliers were graded on evidence of human rights and forced labour policies and on compliance with the Dajcor Supplier Code of Conduct.

#### Conclusion

Dajcor Aluminum remains committed to upholding ethical standards in its business activities, supply chain and ensuring compliance with the Act. Through the implementation of robust supplier management processes, collaboration with responsible suppliers, and ongoing risk assessments, Dajcor Aluminum strives to promote ethical sourcing practices and contribute to a more sustainable and socially responsible business environment.

## **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 or entities 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.

Full Name:

Title:

Date:

PRESIDEN A/24/2025

CINBY

I have the authority to bind Dajcor Aluminum Ltd.

MARKS