



Giampaolo Group of Companies

POLICY AGAINST FORCED LABOUR, CHILD LABOUR, HUMAN TRAFFICKING AND MODERN SLAVERY

We, at the Giampaolo Group which includes, but is not limited to, Triple M Metal LP, Matalco Canada Inc., Matalco Inc., Venture Steel Inc., Giampaolo Investments Limited and Giampaolo Group Inc. (collectively, “GGI”), recognize that forced labour, child labour, human trafficking and modern slavery are unacceptable practices that run contrary to our organizational goals and values. These human rights challenges are complex global issues, yet we are committed to taking steps to identify and address them wherever they arise in our supply chains or organization.

This Policy reflects and should be read with the GGI’s other policies including any supplier’s code of conduct and/or human rights policies. Our core values include the protection and advancement of human dignity and human rights. This Policy applies to all personnel employed by or engaged to provide services to GGI, including, but not limited to, our employees, officers, contingent workers, as well as our vendors, suppliers and partners.

Our managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy, and complete any related certification or training that GGI may implement, whenever GGI decides to do so.

1.0 Scope and Definitions

This Policy applies to all operations and activities of GGI, including to its suppliers, regardless of the jurisdiction in which they operate. It covers all aspects of our business, including our supply chain, business segments, and corporate support functions.

GGI adopts the definitions of “child labour” and “forced labour” as set out in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “*Supply Chains Act*”):

Child labour means labour or services provided or offered to be provided by persons under the age of 18 years and that

- (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;

(b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them;

(c) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or

(d) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999.

Forced labour means labour or service provided or offered to be provided by a person under circumstances that

(a) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or

(b) constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930.

2.0 Policy

GGI will not accept any form of forced labour or child labour, human trafficking, or modern slavery. Our employees, and others with whom we conduct business, must comply with all applicable laws, contracts and policies, and must not engage in any practice that constitutes trafficking in persons or slavery. Our suppliers must comply with all applicable laws, contracts and policies, and must not use any form of forced labour, child labour, human trafficking or modern slavery, in any aspect of their business.

In the event of any audit or investigation related to forced labour, child labour, human trafficking or modern slavery, GGI will cooperate fully with the relevant authorities.

GGI will assess and address risks associated with forced labour, child labour, human trafficking and modern slavery in our supply chain. This includes:

- Complying with the obligations in the *Supply Chains Act*, to report annually on steps we took in each financial year to prevent and reduce the risk of forced labour or child labour in our supply chain or any part of our organization;
- Conducting a risk assessment of our supply chains and areas of business;
- Conducting audits of our suppliers via a questionnaire that must be completed by an executive member of the supply organization;
- Implementing contractually-binding provisions in agreements with suppliers requiring them to comply with all applicable laws, contracts, and policies – including this Policy,

with any violation in respect of forced or child labour being grounds for immediate termination of our supply contract;

- Training our employees, including our supervisory and management teams, on forced labour, child labour, human trafficking and modern slavery, to assist them to understand these issues and identify possible indicators of these unacceptable practices;
- Examining a supplier certification process for suppliers to certify to the best of their knowledge that the materials they incorporate into products were generated in compliance with applicable anti-slavery and human trafficking laws; and
- Making best efforts to annually assess the effectiveness of actions undertaken to combat forced labour, child labour, human trafficking and modern slavery.

3.0 Investigations and Audits

GGI reserves the right, where applicable, to conduct investigation and audits to verify that its business and its business partners, including but not limited to, its suppliers, subcontractors, and vendors, are in compliance with this Policy and the *Supply Chains Act*. GGI's employees and third parties through whom GGI conducts business must fully, accurately and promptly cooperate in any such investigation or audit.

Should an investigation or audit demonstrate that any of GGI's employees or business partners are engaged in any conduct that violates this Policy or the *Supply Chains Act*, or has the potential to violate this Policy or the *Supply Chains Act*, GGI retains the right to take any necessary measures to address and remedy such conduct, as is detailed below.

4.0 Supply Chain Verification

GGI may conduct background screenings prior to entering into any business relationship with third parties in order to ensure that there is no risk of forced labour, child labour, human trafficking, or modern slavery in its supply chains or in any part of its business. GGI enters into business partnerships with the goal of having language that requires all parties involved to comply with applicable laws regarding forced labour, child labour, human trafficking, and modern slavery, including the *Supply Chains Act*.

5.0 Administration

GGI is committed to conducting business with the highest levels of integrity, in full compliance with the spirit and integrity of the laws of each country in which we operate, as well as in full compliance with our policies.

Anyone who believes that this Policy has been violated must report their concerns to Giampaolo Legal Department, 905-793-7086 or by email to Andre Kuyntjes, Vice President, Legal Affairs, akuyntjes@gg-inc.ca or through GGI's website. Failure to report suspected violations of this Policy may be deemed a violation of this Policy.

GGI will not tolerate any retaliation or reprisals against an employee for reporting a concern in good faith or for cooperating with an investigation or audit, even when no evidence is found to substantiate the report.

Any violation of this Policy may be grounds for disciplinary action, up to and including termination of employment or contract, subject to applicable laws. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

6.0 Continuous Improvement

We are committed to continuously improving our policies and practices to prevent and reduce the risk of forced labour, child labour, human trafficking, or modern slavery in our business practices. This Policy will be reviewed periodically to ensure its continued relevance and effectiveness in addressing modern slavery and human trafficking risks.

This Policy will be communicated to all employees, suppliers, and other related third parties. GGI will take all necessary steps to ensure that it is effectively implemented and enforced. We believe that by adhering to this Policy, we can make significant contribution to global efforts to eradicate modern slavery.

Document Information	
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REVISION HISTORY

Revision Level	Date Created	Change Summary
Initial	January 12, 2024	Initial policy release based on the <i>Supply Chains Act</i> .
First Change	May 30, 2024	Revisions to supplier audit based upon works to date.