
Forced and Child Labour in Supply Chains Report

This report (the “Report”) has been prepared by Del Industrial Metals Inc. (“we”, “us”, “our”) pursuant to Section 11 of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and outlines the ongoing actions to prevent and reduce the risk of forced labour or child labour occurring in our business.

Business Structure

Del Industrial Metals Inc. (“Del Metals”) is in Brampton, Ontario Canada. Del Metals has been an independent family-owned company since its establishment in 1992 and is equally committed to its owners, employees, customers, suppliers, the environment and society. We distribute products in Canada and the United States

The company’s focus is on the processing of steel, stainless steel and aluminum coils, piping and tubing for the metals market. The strategic vision is to become the most favored supplier of processed industrial use metal in all its relevant markets.

Del Metals offers products to its customers that set the standards for durability, performance, ease of use, energy efficiency, design and service. The company focuses exclusively on the Del Metals brand and its consistent positioning in the premium segment. Del Metals stands for long-term thinking and planning, continuity of values and goals, good relationships with customers and suppliers, as well as an employee oriented corporate and leadership culture.

Supply Chain

We understand the importance of having an extensive and transparent supply chain and strive to ensure that our suppliers do not engage in any abusive, exploitative or illegal activities. Our direct supplier are primarily Canadian steel, piping and tubing mills and processing centres. However, certain products are imported from metal mills in Europe and Asia. Our indirect material suppliers are locally based, provide facilities, transportation and plant equipment and maintenance and office supplies and professional services. further reducing our risk of utilizing unforced or child labour in our supply chain.

Del Metals has been a member of the North America Steel Alliance and has a Metal Service Centers Institute certification, and our processes are certified by Bureau Veritas. When practical, we utilize sustainable business practices in the company and its supply chain.

Del Metals also asks them to request the same level of compliance from their suppliers.

Del Metals controls the selection of new suppliers and the review of existing suppliers using a comprehensive supplier management system. This involves not only reviewing aspects such as quality, delivery capability and price.

Policies and Controls

We acknowledge that there is a continuous risk of forced and child labour in all sectors, industries and jurisdictions, particularly in relation to raw materials sourcing and product manufacturing. Consequently, Del Metals has implemented enhanced measures to address forced and child labour. Del Metal's core values can be found on its website: www.delmetals.com/about/.

Code of Conduct

All our employees are subject to the Del Metals Code of Conduct which details our policies such as the Diversity and Equal Opportunity policy, and our Health and Safety policy.

Recruitment

We prohibit abuse and discrimination in our workforce and ensure that we comply with all applicable laws and regulations and conduct relevant checks to prevent modern slavery in our workforce.

At Del Metals, the principles of equal opportunity and respect apply to all employees – regardless of their nationality, skin color, gender, religion, sexual orientation, or physical disabilities. Diversity enriches our company and is an important competitive factor.

Audits and Certifications

When Del Metals procures material overall quality is a key consideration in addition to price and availability.

The Del Metals main production facility has received ISO 9001 certification, and this is renewed every three years.

We do not support forced and child labour and understand that it is a continuous risk. Consequently, we monitor our business and strive to further enhance our culture and programs to demonstrate our commitment.

Effectiveness Assessment

Del Metals contacted its key suppliers of direct material used in metals processing to attest to the non-use of child and forced labour in their respective supply chains. All attestations were affirmative.

The due diligence process described above provides a method of managing the risks, however Del Metals will continue to look at ways to enhance our capability to identify any risk indicators within our supply chains and our capability to investigate and address any concerns.

Remediation

We have not identified any instances of forced or child labour in our supply chains and have therefore not taken any steps to remediate. If forced or child labour is identified in our supply chains, we will take appropriate actions to remediate it as necessary.

Approval and Attestation

The Report was approved pursuant to subparagraph 11(4)(a) of the Act the President of Del Metals.

In my capacity as the President and Owner of Del Industrial Metals Inc., and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

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.

Cam Jobin, Owner and President

Del Industrial Metals Inc and affiliated companies

Date: May 31, 2024