

This report (“the Report”) has been prepared to comply with Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Act”) for the financial year ending December 31, 2023.

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1 ABOUT BRANNON STEEL

T.A. Brannon Steel Limited (“Brannon Steel”) is a privately-held company incorporated in Ontario, Canada headquartered at 14 Tilbury Court in Brampton, Ontario with additional locations at 12 Tilbury Court and 275 Orenda Road in Brampton, Ontario. Founded in 1968, Brannon Steel is primarily involved in the supply of carbon steel parts to original equipment manufacturers in the construction, forestry and mining sectors.

2 SUMMARY OF SUPPLY CHAIN

Brannon Steel purchases carbon steel from major North American mills with occasional sourcing from European markets for speciality items. Other significant supply chains, such as those for production equipment and consumables, also originate in North America and Europe while contract services such as skilled trades and production sub-contracts are sourced in the Canadian market.

3 POLICIES & DUE DILIGENCE

Brannon Steel has established a number of policies related to forced labour and child labour as described below. Compliance with company policy is monitored and enforced by Brannon Steel’s Senior Management using established processes for recruiting, hiring, onboarding,

performance management, communication and other activities.

3.1 Freedom of Association

Brannon Steel recognizes the rights of employees under the Canadian Charter of Rights & Freedoms and the Ontario Labour Relations Act, including the rights to form a union and to engage in collective bargaining. We will not engage in unfair labour practices or otherwise interfere in any manner prohibited by law.

3.2 International Trade

While Brannon Steel’s business is focused on the North American market, many of our partners conduct business on a global scale. We will abide by national and international trade restrictions including, but not limited to economic sanctions and import / export controls.

3.3 Modern Slavery

Brannon Steel opposes business practices that violate basic human rights and will not tolerate any form of modern slavery including, but not limited to forced, bonded or compulsory labour or human trafficking. Similarly, we will not conduct business with any entity that engages in restricting employee movement, charging recruitment fees to individuals, confiscating employee documents including passports, withholding wages, abusive working conditions, debt bondage or any other form of abuse, exploitation or violence.

3.4 Recruiting & Hiring

Brannon Steel complies with the law in all employment matters including those related to legal employment status and minimum working age. Recruiting and hiring activity is carried out in compliance with the law and in a fair, professional manner befitting Brannon Steel’s reputation and values.

3.5 Responsible Material Sourcing

Brannon Steel is committed to sourcing steel in a responsible manner that complies with applicable domestic and international law. Suppliers are selected based on a number of factors including their ability to ensure a consistent, cost-reliable and stable supply; their commitment to ethical conduct including respect for human rights; and their dedication to sustainable business practices. Steel supply partnerships are reviewed periodically by Senior Management and potential new partners are vetted based on factors including those listed above.

3.6 Working Conditions

Brannon Steel recognizes that positive working conditions promote productive, long-term employment which supports employees and their families, our business objectives and the community in general. We comply with the law in all matters of employment including, but not limited to compensation, hours of work, payment of wages, benefits and leaves. Information regarding employment-related topics is shared as freely as is legally and reasonably possible and required information is posted at each of Brannon Steel's business locations.

4 RISK ASSESSMENT

Brannon Steel's supply chains originate in regions with strong legal protections against forced labour and child labour. Furthermore, Brannon Steel's primary steel suppliers maintain strong policies against forced labour and child labour. As a result, the risk of Brannon Steel supporting forced labour or child labour, whether directly or indirectly, is low.

5 MEASURES FOR REMEDIATION

Brannon Steel has had no occasion to remediate any forced labour or child labour, nor to remediate the loss of income to the most vulnerable families that results from a measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.

6 TRAINING

All employees are made aware of Brannon Steel's expectations for conduct and ethics, including its policies related to forced labour and child labour, as well mechanisms for reporting concerns without fear of reprisal.

7 ASSESSING EFFECTIVENESS

Brannon Steel's Senior Management Team meets annually to review the effectiveness of its Environmental, Social & Governance ("ESG") efforts including measures to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere or of goods it imports into Canada.

8 APPROVAL & ATTESTATION

In accordance with the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for the entity named 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. I have the authority to bind T.A. Brannon Steel Limited.

Dated: May 28, 2024



David Brannon, CEO & Owner