

REPORT ON FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

Introduction

This report is prepared by Winoa USA Inc. ("Winoa USA, "Company", "we", "us"), in accordance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act").

Winoa USA has implemented several measures to prevent and reduce the risk of forced labour and child labour in its supply chain. These steps include assessing risk related to forced labour or child labour, requiring strict adherence to the Company's Business Partner Code of Conduct, providing training and awareness programs to employees, and establishing a whistleblower system for reporting violations.

This report describes Winoa USA's activities during its most recent financial year, January 1, 2023 to December 31, 2023 to prevent and reduce the risk that forced labour or child labour is used at any step in Winoa USA's supply chains and provides additional information as set out in the Act.

Our Company – Structure, Activities, and Supply Chains

Winoa USA is a manufacturing and distribution subsidiary of a global company headquartered in France. Winoa USA's core business is steel shot manufacturing. We distribute goods, such as steel blasting media, in North America. The Company is a legally registered Canadian corporation. Our operations are regionally centralized, with Winoa USA forming part of the "Americas Region". The Company has approximately 775 employees, of which approximately 50 are located in Canada. Winoa USA imports finished goods from other companies within the Winoa Group. Our suppliers are subject to our supply chain screening processes and consists of companies primarily located in North America, Europe, and Asia.

Policies And Due Diligence Processes In Relation To Forced Labour And Child Labour

Winoa USA strictly prohibits the use of forced or child labour in all its operations and supply chains. This prohibition is clearly outlined in both our [Code of Business Conduct](#) and our [Business Partner Code of Conduct](#). Both documents are available on our company intranet and on our external website. The Code of Business Conduct is also posted in our facilities.

All employees (directors, officers, employees) are required to adhere to our Code of Business Conduct (the "Code"). The Code provides guidance to our employees in their conduct of their professional activities. It was updated during the reporting period. The Code is intended to formalize our commitments to our major internal and external stakeholders, along with the ethical principles that must guide the actions and behavior of all Winoa USA employees. Winoa USA does not tolerate any human rights abuses such as forced labour, child labour, trafficking in persons, or any form of harassment. Violations of the Code may result in discipline by Winoa USA, including reprimand, suspension or termination according to applicable local rules and procedures. Winoa USA may also report violations of the Code to the appropriate supervisory, regulatory or law enforcement authorities.

During the reporting period, we updated our Business Partner Code, which details business practice standards for our direct suppliers of goods, distributors, service providers, consultants, resellers, and other similar parties that provide goods or services to, for, or on behalf of Winoa USA ("suppliers"). All suppliers are required to adhere to our Business Partner Code of Business Conduct (the "Business Partner Code").



During the supplier registration process, all suppliers are required to commit to the Business Partner Code. Winoa USA expects our suppliers to:

- Respect the fundamental labour standards set forth in the conventions of the International Labour Organization with regard to the abolition of forced labour, child labour and slavery.
- Not use forced or compulsory labour and to not employ children under the age of 15.
- Commit to providing and maintaining a safe and healthy workplace.
- Respect the right to freely associate, organize, and bargain collectively in accordance with local laws.
- Maintain workplaces free from any form of physical, sexual, psychological or verbal coercion, harassment or abuse.

Assessing and managing forced labour and child labour risks

Winoa USA recognizes that there is risk that forced labour and child labour can occur at any stage of the supply chain.

With regards to our suppliers, the risk of forced or child labour within Winoa USA's supply chain is low. Winoa USA conducts due diligence on our suppliers to ensure compliance with applicable laws and to manage third-party risks. We leverage a third-party software solution to support these activities. A substantial proportion of our suppliers are located in regions with strong labour regulations and our intercompany suppliers adhere to the Code.

Our suppliers are continuously monitored through our third-party software solution and we will work with our suppliers to ensure that they do not employ forced or child labour and have themselves put measures into place to manage these risks in their own supply chains.

With regards to our customers, they also undergo a comprehensive screening process. 100% of our customers are vetted to detect any potential issues related to forced or child labour. This thorough approach further mitigates any associated risks in our supply chain.

Winoa USA actively encourages its employees and suppliers to collaborate with us in addressing any compliance-related concerns. Both employees and suppliers have the option to anonymously report concerns or issues, including allegations of forced or child labour.

Remediation Measures

During the reporting period, Winoa USA did not identify any instances or significant risks of forced labour or child labour in its operations or supply chains that would require remediation measures. The Company accordingly did not undertake any measures to remediate the loss of income to the most vulnerable families resulting from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.

In the event that forced, or child labour is identified within our supply chains, Winoa USA is committed to taking immediate and effective measures to remediate the situation. These measures include terminating contracts with non-compliant suppliers and/or collaborating with relevant authorities as required to address and resolve the issue.

Training

Winoa USA emphasizes comprehensive education for its employees on all topics, which include content on forced labour and child labour, covered in the Code. All employees receive training on the Code at the



timing of onboarding. We regularly organize training sessions to ensure that employees are well-versed in our policies and understand their roles in upholding these standards.

Assessing Effectiveness

To ensure the ongoing effectiveness of our actions in preventing forced and child labour, Winoa USA employs several assessment methods such as continuous monitoring and evaluation of our supplier selection processes, reviewing and updating our policies and training programs in response to emerging risks and industry best practices.

We remain committed to preventing forced labour and child labour from taking place in our businesses and supply chains, and we are continuing to develop frameworks and processes to assess the effectiveness of our policies, procedures and practices to determine any potential improvements.

Approval and Attestation

This report was approved by the Winoa USA's board of directors on December 2, 2024.

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.

I have the authority to bind Winoa USA Inc.

William Cousineau

Full name: William John Cousineau

Title: Chief Executive Officer Americas

Date: 12/2/2024

