



ANNUAL REPORT

This report is made pursuant to *Fighting Against Forced Labour and Child Labour in Supply Chains Act* S.C. 2023, c. 9 (the “Act”). The report outlines the approach and initiatives taken by Kimco Steel Sales Limited (“**Kimco Steel**”) to identify and address the risks of forced labour and child labour in its business operations and supply chains in its 2025 financial reporting year.

OUR COMMITMENT

Kimco Steel is committed to preventing and reducing the risk that forced labour or child labour is used in the production of the goods it sells to its customers in Canada and globally.

CATEGORIZATION, SECTOR, AND INDUSTRY

Kimco Steel is an entity under the Act

Kimco Steel operates a steel service centre, scrap metal, and recycling facility in Kingston, Ontario. Kimco Steel also meets the minimum asset and revenue thresholds as defined in the Act.

Our Operations

Kimco Steel’s steel service centre, scrap metal, and recycling facility is one of the largest steel warehousing facilities in Eastern Ontario. Located in Kingston’s Industrial Park, Kimco Steel has 240,000 square feet of steel warehousing and over 35,000 tons of steel inventory.

As both a scrap recycler and a new steel distribution centre, Kimco Steel sells its processed scrap to steel mills and buys finished products from mills for distribution. The company also provides cut-to-size customizations for oversized structural steel. Finally, Kimco Steel provides containerized refuse, construction, and demolition pickup service to parts of Kingston and offers disposal containers service to its customers in other parts of Canada and the United States.

STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Our Structure

Kimco Steel is a corporation incorporated pursuant to the *Business Corporations Act* (Ontario). Its key activities are the manufacturing and wholesale trade of steel products for its local and international consumers. The company is engaged in producing, selling, and importing goods in and/or outside of Canada, as well as importing into Canada goods that are produced outside of the country.

Our Supply Chain

Visit our **WEB SITE** @ www.kimcosteel.com
Our **E-MAIL ADDRESS** is sales@kimcosteel.com



Kimco Steel sources and procures structural steel materials from various approved vendors who are located in Canada and internationally. Most of its scrap metal vendors are located in North America. Additionally, the company works with suppliers of structural steel materials from outside of North America, including the United Kingdom, mainland Europe, and Asia. The finished goods produced by Kimco Steel are primarily sold across Canada and the United States.

POLICIES AND DUE DILIGENCE PROCESSES

Kimco Steel has due diligence processes in relation to forced and/or child labour, including embedding responsible business conduct into policies and management systems. In its previous financial year, Kimco Steel maintained several policies and processes to help identify and manage potential forced labour and child labour risks within the business and its supply chain, including:

1. A Roles and Responsibilities of All Workplace Parties Policy, which requires that only workers over the prescribed age are employed by Kimco Steel. In addition, no party may knowingly permit anyone under the prescribed age in or about the workplace;
2. An Employee Code of Conduct, which sets out how employees can report a potential or actual breach of the Employee Code of Conduct on a confidential and anonymous basis;
3. An Internal Auditing Policy, which sets out the process and scope of Kimco's internal audit. The scope of internal audit includes reviewing the systems established to ensure compliance with policies, procedures, statutory requirements, and regulations and to report significant risk exposure.
4. Continuing to require new and existing employees to review the training module we developed on our Child Labour and Forced Labour Policy.
5. Distributing, to selected suppliers, a Supplier Code of Conduct Questionnaire specific to Forced & Child Labour to help prevent and reduce the risk that forced labour or child labour is used at any step of the production of the goods that the company sells in or outside of Canada.
6. Kimco added a note on the header of our purchase orders stating "Kimco Steel Sales Limited is committed to its annual reporting requirements of Bill S-211 Fighting Against Forced Labour and Child Labour in Supply Chains Act. By accepting this PO, you are making a commitment to assess your supply chain and advise us if you identify the use of any forced or child labour within it. For more information on the Act please visit: laws.justice.gc.ca/eng/acts/F-10.6/"

In the subsequent reporting years, Kimco Steel intends to continue to educate our staff on this matter and send the Supplier Code of Conduct Questionnaire to a wider group of suppliers. Kimco Steel also intends to search the registry of Annual Reports of Child and Forced Labour for our largest suppliers to determine if they are filing their annual report, if required.

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FORCED LABOUR AND CHILD LABOUR RISKS

In the prior reporting period, Kimco Steel engaged KPMG to analyze its import history from CBSA and found some of the products purchased from one specific vendor were imported from a higher risk area for the use of forced and/or child labour, after becoming aware of this, we reached out to this specific vendor who assured us that they made routine visits to their location and have no issues of forced and/ or child labour in their location. We continue to use this vendor. This analysis is not conducted each year as we are rarely the importer of record on products from outside North America. Additionally, the vendors we use are typically consistent year over year.

REMEDIATION MEASURES

Kimco Steel has not identified any forced labour or child labour in its activities or supply chains. As such, the company has not undertaken any remediation measures.

REMEDIATION OF LOSS OF INCOME

Kimco Steel has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As such, the company has not undertaken any income remediation measures.

TRAINING PROVIDED TO EMPLOYEES

Kimco Steel provides general training to its employees, including with respect to safe and legally compliant workplace practices and policies. In 2024 Kimco Steel implemented a standalone training module on our Child Labour and Forced Labour Policy. This module is now included in all new hire training and current employee annual refresher training.

ASSESSING EFFECTIVENESS

Our Health and Safety department assess the completeness of the employee training requirements on this subject. In subsequent years we plan to assess the vendor communication regarding Forced and Child Labour.

APPROVAL AND 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 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.

IN WITNESS WHEREOF the authorized signing officer(s) of Kimco Steel Sales Limited have executed this report as of the effective date of the signatures set out below.

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SIGNED

) KIMCO STEEL SALES LIMITED
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28-May-2026

Date

) 
) **Name:** Cody Rosen

) **Title:** President
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)

) I have authority to bind Kimco Steel Sales Limited

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