

ANNUAL S-211 REPORT

ACT TO ENACT THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT AND TO AMEND THE CUSTOMS TARIFF

WENTWORTH METAL RECYCLING and its Canadian subsidiaries

(collectively, “WENTWORTH”)

Structure, Activities and Supply Chains

Wentworth is a corporation constituted under the laws of Canada, whose head office is situated in Hamilton, Ontario. Wentworth is the parent corporation of a number of subsidiaries, operating in Canada and across the globe.

Wentworth is a scrap metal recycling company with various lines of business consisting of the recycling of ferrous and non-ferrous scrap metal, and demolition.

Wentworth is a vertically integrated business however, it sources ferrous and non-ferrous scrap metal from industrial clients and other businesses that generate such metals as a result of their larger manufacturing processes or general operations. Ferrous and non-ferrous scrap metal is also sourced from the general public who sell and deliver directly to Wentworth at its facilities.

Policies, Due Diligence Processes

Wentworth has a sophisticated human resources department, consisting of HR representatives, business partners and support staff located across all of its operations that are trained in and aware of applicable legislation with respect to child and forced labour. These professionals ensure that said legislation is respected and enforced on a daily basis.

Wentworth’s Code of Ethics provides that no child under the age of 16 can work in Wentworth facility. If the law requires a higher age, the law must be followed. All of Wentworth’s suppliers must also have sufficient management systems in place to ensure that no child works in any of their facilities; otherwise, Wentworth will not be able to affiliate with them. Young workers or students under the age of 18 may only perform low-risk tasks in the factory, and all laws regarding the treatment of young workers must be followed. Please refer to the internal policy on this matter.

Parts of its business and supply chains that carry a risk of forced labour or child labour being used, steps taken to assess and manage that risk.

Wentworth has not identified any part of its business that could reasonably carry any risk of forced labour or child labour, as its supply chain is located in Canada and the United States of America.

Measures taken to remediate any forced labour or child labour

Since no forced labour or child labour has been identified, no measures have been required for any form of remediation.

Measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains;

Idem.

Training provided to employees on forced labour and child labour

All employees in the context of their onboarding are educated on Wentworth's policies and values, which includes a firm stance against forced labour and child labour as well as an adherence to all applicable laws.

On their start date, all employees are required to sign Wentworth's Code of Ethics and Conduct which specifically addresses forced labour, child labour, and the compliance with respect to applicable legislation pertaining thereto.

Assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.

All employees and hires must be screened by HR prior to their hiring. No employee can be hired unless they meet all applicable legislative requirements.

Approval and attestation on next following page – remainder of this page left blank

APPROVAL AND ATTESTATION:

Dated and submitted on May 28th, 2026.

Wentworth Metal Recycling

Per:

(s) Suresh Kalagara

Suresh Kalagara, Vice-President, Recycling.

I have the authority to bind **Wentworth Metal Recycling**

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 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.