



# GREAT LAKES C O P P E R L T D.

## ANNUAL REPORT

### PURPOSE

This annual report for the 2023 financial reporting year has been created by Great Lakes Copper Ltd. (“**Great Lakes Copper**”) for the sole purpose of meeting its obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “**Act**”).

### STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

Great Lakes Copper is a limited liability company incorporated under the Canada Business Corporation Act with its principal operations based in Ontario, Canada. Great Lakes Copper operates primarily out of London for manufacturing, with a warehouse facility in St. Thomas.

Great Lakes Copper operates as a comprehensive copper tube manufacturer, manufacturing bare and coated copper tube in a wide range of diameters and lengths. Great Lakes Copper serves the plumbing, refrigeration, original equipment manufacturer, medical, air conditioning and specialty markets with a wide range of products suitable for applications where copper is required. Its product line includes line sets and ductless line sets, available in coil or straight-length configurations, with diverse lengths and outside diameters.

Great Lakes Copper sells its products through the wholesale, distribution, and retail channels in Canada and United States.

Great Lakes Copper main purchases are scrap copper, cathode, and semi-finished copper, which constitute the largest portion of company’s purchases. Great Lakes Copper’s supply channels consist of scrap processors, dealers, brokers, distributors, and manufacturers. Great Lakes Copper procures its purchases from North America, Europe, and Asia.

### POLICIES AND DUE DILIGENCE PROCESSES

Great Lakes Copper maintains a general due diligence policy that outlines their business conduct and ethics. This policy requires that all employees comply with all applicable laws related to the business affairs, business conduct, and business operations of Great Lakes Copper.

Great Lakes Copper’s standard purchase agreements (“**SPA**”) include a clause that requires their supplier to comply with all applicable federal, provincial, state, and local laws and regulations which have jurisdiction over the work covered in the SPA. Specifically, the SPA requires that goods that are manufactured and supplied must comply with all applicable federal, state, and local laws.

#### GREAT LAKES COPPER LTD. ♦

1010 Clarke Road ♦ London, ON ♦ N5Y 5S6 ♦ (519) 455-0770  
385 South Edgeware Road ♦ St Thomas, ON ♦ N5P 4C5 ♦ (519) 681-3075  
Customer Service Fax: (519) 455-9238  
ISO 9001:2008



Additionally, the SPA requires the supplier, upon request of Great Lakes Copper, to furnish all certificates of origin and other information related to the costs and places of origin of the goods, in order to comply with all applicable governmental regulations. The SPA requires that the supplier agree to comply with all such regulations.

Great Lakes Copper maintains employee policies and procedures that prescribe duties, responsibilities, and expectations of employment. This includes workplace policies and procedures to operate in compliance with provincial employment standards, human rights, and occupational health and safety legislation.

Finally, Great Lakes Copper provides access to a hotline where workers may contact through phone call or online portal, to report on an incident related to ethical violations, internal controls, conduct violations, violation of company policy, and violation of the law.

#### **STEPS TAKEN BY GREAT LAKES COPPER IN 2023**

The above due diligence processes and policies were in place in the prior financial year. Great Lakes Copper did not take other steps specific to the prevention of forced or child labour but is exploring what additional steps may be appropriate. As part of that, Great Lakes Copper and its leadership started the process of reviewing and evaluating its internal policies and procedures with respect to the issues of child labour and forced labour.

#### **FORCED LABOUR AND CHILD LABOUR RISKS**

Moving forward, Great Lakes Copper will be working to identify specific risks of forced labour and child labour that may exist in its supply chain. It is aware that there may be higher risks associated with certain regions, goods, and industries.

#### **REMEDATION MEASURES**

Great Lakes Copper has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

#### **REMEDICATION OF LOSS OF INCOME**

Great Lakes Copper 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, it has not undertaken any income remediation measures.

#### **TRAINING PROVIDED TO EMPLOYEES**

Great Lakes Copper provides employee training as part of its onboarding process. In 2023, Great Lakes Copper did not provide training to its employees specific to forced labour or child labour. Great Lakes Copper is in the process

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of assessing what forced labour and child labour-related training may be appropriate, with a particular focus on its procurement team.

### ASSESSING EFFECTIVENESS

Great Lakes Copper does not currently have specific policies and procedures in place to assess its effectiveness in reducing and/or eliminating the risk of child labour and/or forced labour in its supply chain. However, it will be assessing what measures may be appropriate in the future.

Great Lakes Copper anticipates that such measures may include monitoring the development of forced labour and child labour-related attestations in requests for proposals and procurement contracts; tracking the number and types of internal roles that receive training under the Act; and, increasing the data collected with respect to supplier labour practices and the countries of origin for goods.

### 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 Great Lakes Copper have executed this report as of the effective date of the signatures set out below.

**SIGNED**

May 30, 2024 \_\_\_\_\_  
**Date**

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**GREAT LAKES COPPER LTD.**  
  
**Per:** \_\_\_\_\_  
**Name:** Hesham Alabbar  
**Title:** General Manager  
I have authority to bind Great Lakes Copper Ltd.