

TUYAUX ET MATÉRIEL DE FONDATION LTÉE. PIPE and PILING SUPPLIES LTD.



2023 Supply Chain Act Annual Report

**POUTRES ET PALPLANCHES
BEAMS AND SHEET PILING**
5025 Ramsay
St. Hubert, P.Q. J3Y 2S3
(450) 445-0050, (514) 879-9008
Fax: (450) 445-4828

This Annual Report (the “**Report**”) is produced in accordance with section 11(1) of the *Fighting Against Forced Labour and Child Labour in Supply Chain Act* (the “**Supply Chain Act**” or the “**Act**”) and is filed for the following entities, each directly or indirectly owned by the Jack Dym Trust (“**Pipe & Piling**”):

- Mike Dym Holdings Ltd;
- Pipe & Piling Supplies Ltd;
- Pipe & Piling Supplies (Eastern) Ltd;
- Pipe & Piling Supplies (Central) Ltd;
- Pipe & Piling Supplies (Western) Ltd; and
- Pipe & Piling Supplies (B.C.) Ltd,

(each a “**Reportable Entity**” and collectively, the “**Reportable Entities**”, “we”, “us” or “our”) covering the financial year ended September 30, 2023 (the “**Reporting Period**”).

1. Our Structure, Operations and Supply Chains

The Jack Dym Trust is the beneficial owner of all the shares of Mike Dym Holdings Ltd, a corporation incorporated under the *Canada Business Corporations Act* headquartered in Longueuil, Quebec, Canada. In turns, Mike Dym Holding Ltd is the sole owner of Pipe & Piling Supplies Ltd, Pipe & Piling Supplies (Eastern) Ltd, Pipe & Piling Supplies (Central) Ltd, Pipe & Piling Supplies (Western) Ltd and Pipe & Piling Supplies (B.C.) Ltd.

The Reportable Entities employ 77 people in Canada.

Pipe & Piling manufactures structural and *American Society for Testing and Materials* piling grade steel pipes. It also operates two spiral pipe mills located in Montreal, Quebec and Toronto, Ontario.

Pipe & Piling also produces pipes for use in water lines, sewer lines and penstock. We also manufacture non-standard pile to our customers’ specific requirements and offer steel pipe for various structural purposes and miscellaneous usages such as horizontal augering/jacking, floats and drainage. Pipe & Piling also keep inventory of a complete line of H-piles and WF Beams and can meet most needs for piling tips and shoes in standard cast steel or special fabricated types.

During the Reporting Period, we have not perform an assessment of the countries or origin of the raw material used in our manufacturing process and contained in the products we sell, distribute or import and the type of suppliers making up our supply chains.



2. The Steps We Have Taken in the Reporting Period to Prevent and Reduce the Risk of Forced Labour and Child Labour

During the Reporting Period, we did not take any steps to prevent or reduce forced labour and child labour in our supply chains.

3. Policies, Due Diligence and Controls

At the moment, we do not have policies regarding forced labour, child labour or human rights in general. We have not developed due diligence processes or controls in regards to these topics.

Nonetheless, we aim to develop in the future policies tackling these issues to ensure that instances of forced labour or child labour in our operations and supply chains may be uncovered and addressed.

4. Risk Assessment Methodology and Results of Assessment

During the Reporting Period, we did not make any assessment of the potential risk related to forced labour and child labour in our operations and supply chains. In the future, we plan to roll-out a compliance program which may include a questionnaire designed to specifically address the issue of forced labour and child labour which we initially plan to send to our Tier 1 (direct) suppliers.

5. Risks of Forced Labour and Child Labour in our Operations and Supply Chains

To the best of our knowledge, during the Reporting Period we have not identified risks of forced labour and child labour in our operations and supply chains. Our risk assessment process is currently non existence. We have a goal of possibly setting up a compliance program to address this issue during our current financial year.

6. Remedial Action Taken during the Reporting Period

No, we have not taken any remediation measures during the Reporting Period.

7. Our remediation processes

Since we have no compliance program addressing specifically the issue of forced labour and child labour in our operations and supply chains, we have currently no remediation process in place to deal with this issue.

8. Remediation actions for the loss of income to the most vulnerable families that results from any measure taken to eliminate forced labour and child labour from our operations and supply chains

No, we have not taken any remediation measures.

9. Our training

We have no director, officer or staff training in place at the moment dealing with forced labour and child labour in our operations and supply chains.

10. Assessing our effectiveness

No assessment of our effectiveness to prevent and reduce the occurrence of forced labour and child labour in our operations and supply chains was conducted during the Reporting Period and until we put in place a compliance program to address this issue we are not contemplating doing so.

11. Our consultation and governance process

In preparing this Report, we consulted our external legal counsel. We have no governance process related to preventing and reducing the occurrence of forced labour and child labour in our operations and supply chains, except for having this report approved by the Trustee of the Jack Dym Trust.

12. Approval

This Report was approved by the trustees of the Jack Dym Trust on May 8, 2024.

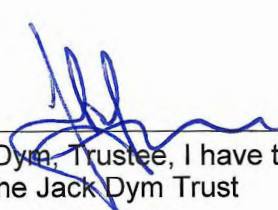
13. Attestation

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 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.

Dated this 8th day of May, 2024

Jack Dym Trust

Per:



Jack Dym, Trustee, I have the authority to
bind the Jack Dym Trust