



**NORTH AMERICAN METALS
OF CANADA LTD.**

130 Harry Walker Parkway, Newmarket, Ontario L3Y 7B2
Telephone (905) 898-2291 • Fax (905) 898-0851

FORCED LABOUR AND CHILD LABOUR IN CANADIAN SUPPLY CHAINS FISCAL REPORT YEAR 2023

This statement is made pursuant to Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) and sets out the steps that North American Metals of Canada Ltd. operating as Eurospec Manufacturing and ETP Holdings Inc. operating as Eurospec Tooling (collectively “Eurospec”, “we”, “our”) have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking, forced labour and child labour. North American Metals of Canada Ltd. has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business and Supply Chains

Eurospec is an automotive part supplier that is an accomplished full-service organization that offers a large collection of manufacturing and technical services. Currently, we supply parts to customers primarily in North America, Europe and Asia. Eurospec is continually growing and improving our global presence.

Eurospec purchases only from reputable suppliers with whom we have a longstanding relationship. Approximately 90% of our raw materials (primarily steel) are obtained from suppliers who operate in North America. A very small amount of our supplies come from China, and while we expect the risk of forced labour in our supply chain is low we have not yet undertaken any steps to assess the risk.

North American Metals of Canada Ltd./ ETP Holdings Inc. operate out of the following locations:

130 Harry Walker Parkway North, Newmarket, Ontario	Metal stamping, Weld and Assemblies Tool and Die
100 Vandorff Side Road, Aurora, Ontario	Packaging, shipping



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Our Policies and Due Diligence

Eurospec is an equal opportunity employer, and we follow the employment standards act. We have policies relating to working hours and to limit excessive overtime.

We have implemented changes to our Supplier Manual in response to the Act with the inclusion of the following paragraph:

Supplier represents, warrants, and covenants that it and all Items will comply with all Legal Requirements. Supplier represents, for itself and for its Representatives and subcontractors that it has not and does not use slave, prisoner, child, or any other form of forced or involuntary labor in the design, development, engineering, manufacture, processing, production, delivery, or supply of Items to or for the Buyer under the Agreement. Supplier represents that it takes reasonable steps to ensure that there is no slave, prisoner, child, or any other form of forced or involuntary labor in the operations of supply chains of its vendors. Supplier acknowledges Buyer's initiatives to eliminate forced labor from its supply chain and agrees to undertake measures to detect and eliminate forced labor from its own supply chain.

In addition, we are updating our Purchase Orders to all our suppliers to include a sentence with respect to the adherence to Act's requirements with a link to our Supplier Manual.

Web site: <https://europsectooling.com/contacts/>

We strive to onboard new suppliers and contractors to comply with the new regulation. Currently, we have not undertaken any diligence activities in respect to our suppliers.

Remediation Measures

We have not identified any instances of child or forced labour in our operations or supply chains and have therefore not taken any remediation measures.

Training and Assessing Our Effectiveness

At present we do not offer training relating to modern slavery, and do not take measures to assess our effectiveness in combating child and forced labour. Although we generally consider our risks to be low, we will consider implementing such measures in the future.



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Approval for this statement


This statement was approved by the board of directors of North American Metals of Canada Ltd. on May 30, 2024 pursuant to section 11(4)(b)(ii) of the Act to reflect the activities in 2023. As Corporate Officer and signing authority I have the authority to bind North American Metals of Canada Ltd. and ETP Holdings Inc.

Name: Ken Rudnick

Signature: 

Title: Director

Name: Tim Gargaro

Signature: 

Title: Director

Date: May 30, 2024