



CCMA, LLC

**Fighting Against Forced Labour and Child Labour in Supply Chains Act Report
for Fiscal Year 2025**

Approved by the board of directors on April 30, 2026

A. Introduction

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) requires certain entities that do business in Canada to report on actions they have taken during the previous fiscal year to prevent and reduce the risk of forced labour or child labour within their operations and supply chain. This report was prepared by CCMA, LLC (“**CCMA**” or the “**Company**”) and describes the steps taken by CCMA for the fiscal period of January 1, 2025, to December 31, 2025 (“**reporting period**”) to prevent and reduce the risk of forced labour and child labour in its own business operations and in its supply chains.

B. Structure, activities, and supply chains

CCMA is an independent, knowledgeable and innovative trading house focused on metals, alloys, and other raw materials. CCMA is privately owned and headquartered in Getzville, New York, USA.

CCMA is a trading company engaged in the sourcing, transportation, importing, trading and distribution of ores and concentrates, alloys, aluminum additives, base metals, minor and special metals, and other raw materials globally, including in Canada. Our Company sources products from suppliers located in North America, Asia, Europe, Africa and South America and acts as the importer of record into Canada. There were no material changes to CCMA’s business activities or sourcing during the reporting period.

We are proud of our long-term partnerships with world-class producers of critical materials and commodities across the globe. As a commodity trading company, CCMA’s supply chains are vital to our operation. We are focused on efficient sourcing and distribution rather than manufacturing or raw material production/extraction.

Policies and due diligence processes in relation to forced labour and child labour

1. Human Rights Policy

Our Human Rights Policy sets out our Company’s commitment to upholding the highest level of integrity with respect to human rights, social responsibility, the environmental and workplace health and safety in the conduct of our business and across our supply chain operations, in alignment with the United Nations’ Universal Declaration of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work. Regarding human rights, the Human Rights Policy specifies the following:

1. CCMA takes a zero-tolerance approach to violations of human rights and expects those in its supply chain to be similarly intolerant of child labour, forced labour, modern slavery, human trafficking or violation of any human rights law.
2. CCMA is committed to meeting its responsibility in respecting and seeking to uphold all applicable internationally recognized human rights standards and laws.

3. CCMA does not engage in, and expects its customers, suppliers and producers not to engage in, child labour, forced labour, indentured labour, slavery, human trafficking or exploitative work or environments.

4. CCMA seeks to avoid sourcing conflict minerals (tin, tungsten, tantalum and gold) that contributed to armed conflict or human rights abuses in Conflict Affected and High-Risk Areas (“CAHRAs”), including the Democratic Republic of the Congo (“DRC”) and DRC-adjointing countries. CCMA also seeks to avoid harming communities in CAHRA through *de facto* embargoes of minerals responsibly sourced from those areas.

- CCMA seeks to take affirmative actions and conduct appropriate due diligence across its supply chain to uphold applicable internationally recognized human rights standards and laws, particularly with respect to the sourcing of materials that are at higher risk for having been mined or otherwise produced in violation of human rights, such as conflict minerals (tin, tungsten, tantalum and gold) or cobalt.

We seek to hold our customers, suppliers and producers to the same level of accountability, integrity and commitment to social business practices as we do ourselves. CCMA expects its business partners and other parties whose own impacts may be directly linked to CCMA’s operations to respect and not infringe upon human rights and will respond appropriately where they are not respecting human rights.

2. Employee Handbook and Whistleblower Hotline

The Employee Handbook delineates specific practices and standards of ethical behaviour expected from employees, which include but are not limited to workplace conduct and behaviour, health, safety, and security. The Employee Handbook is reviewed on an annual basis to ensure alignment with CCMA’s policies, and requires formal acknowledgment by all employees when they are hired and on an annual basis. CCMA maintains and monitors a whistleblower hotline. The whistleblower hotline continued to be in place throughout the 2025 reporting period. No complaints or allegations were made during the 2025 reporting period through the whistleblower hotline regarding any topics covered in this report.

3. Conflict Mineral and Responsible Sourcing Policy

CCMA maintains the Conflict Mineral and Responsible Sourcing Policy (“CMRSP”). CCMA recognizes that it is involved in trade of certain minerals (tin, tantalum, and tungsten) that present a higher risk of forced labour and child labour. Although CCMA is not directly involved with mining or production operations, the CMRSP reflects CCMA’s commitment to taking proactive measures and to conduct risk-based due diligence across its supply chain in accordance with applicable internationally recognized human rights standards, laws and guidelines. During the reporting period, no violations of the CMRSP by suppliers were identified through CCMA’s due diligence processes.

4. Sustainable Procurement Policy

CCMA adopted a Sustainable Procurement Policy in 2024, which was in effect throughout the 2025 reporting period. The policy reflects CCMA’s commitment to integrating social

responsibility considerations into its procurement practices and to mitigating risks related to forced labour and child labour within its supply chains.

The Sustainable Procurement Policy affirms CCMA's commitment to respecting internationally recognized human rights and prohibits forced labour, child labour, and human trafficking. The policy requires suppliers to comply with applicable labour and human rights laws and to provide safe and healthy working conditions.

The policy also supports CCMA's supplier due diligence framework by promoting fair labour practices and by requiring the evaluation and monitoring of suppliers against social sustainability criteria, including through audits and assessments as required. CCMA may take corrective action where supplier practices are found to be inconsistent with the objectives of the Sustainable Procurement Policy.

In accordance with the policy's continuous improvement objectives, CCMA is committed to undertaking periodic reviews and updates of the Sustainable Procurement Policy to reflect evolving social sustainability standards and best practices.

C. Risks of forced labour and child labour and the steps taken to assess and manage the risks

CCMA assesses risks, including forced labour and child labour risks, in its activities and supply chains on an ongoing basis. This includes evaluating sourcing networks to identify and prevent any materials linked to conflict or unethical practices. We have engaged a third-party service provider to assess the Company across various sustainability criteria, in four themes: Environment, Labour and Human Rights, Ethics, and Sustainable Procurement.

CCMA conducts risk-based due diligence on its suppliers to ensure compliance with applicable laws and to manage third party risks. As part of the supplier pre-qualification and ongoing due diligence process, we leverage third party service providers to screen and monitor our suppliers and collect and assess information relating to risks, including risks associated with human rights (e.g., forced labour or child labour).

CCMA recognizes that conducting due diligence on mineral supply chains in conflict-affected and high-risk areas is an ongoing process. CCMA therefore focuses on building transparent relationships with our suppliers and producers of conflict-free tin, tantalum and tungsten that demonstrate ethical and transparent supply chain initiatives. We only procure conflict-free tin, tantalum and tungsten which is sourced from smelters that are approved by the Responsible Minerals Initiative ("RMI") and/or produced from recycled sources. RMI defines standards for smelters and refiners that participate in the Responsible Minerals Assurance Process ("RMAP"). CCMA ensures that suppliers have successfully completed RMI's RMAP within each assessment cycle or are in the process of reassessment by checking the current list published by RMI prior to each purchase. As part of the RMAP assessment, risks such as forced labour and child labour are identified and assessed.

D. Remediation measures

CCMA did not identify any instances of forced labour or child labour in its activities or supply chains during the reporting period, and accordingly there were no measures taken in the reporting period to remediate the adverse impacts of forced labour or child labour. There were no identified instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in the Company's activities and supply chains.

E. Training

All employees are required to acknowledge that they have reviewed the Employee Handbook and the Human Rights Policy. They also receive online training that addresses mechanisms for reporting workplace concerns. Training on labour standards and workplace compliance is mandatory and is reviewed periodically to ensure alignment with current practices.

F. Assessing effectiveness

During the reporting period, CCMA did not have formal policies or procedures in place to specifically assess its effectiveness in ensuring that forced labour and child labour are not used in its activities and supply chains. CCMA evaluates and updates its corporate policies and procedures periodically and is committed to continuous improvement in its approach to preventing and reducing forced labour and child labour risks.

In addition, CCMA engaged EcoVadis, an independent third-party sustainability ratings platform, to assess its sustainability management practices across four themes: Environment, Labour and Human Rights, Ethics, and Sustainable Procurement. During the reporting period, CCMA received an EcoVadis score of 58 out of 100, corresponding to EcoVadis' "Committed" recognition level.

Based on the results of this assessment and the associated benchmarking feedback, CCMA identified opportunities to further strengthen its policies, documentation, and implementation practices. As part of its commitment to continuous improvement, CCMA aims to strengthen its sustainability management practices with the objective of improving its EcoVadis rating and achieving a higher recognition level in future assessment cycles.

G. Approval and attestation

This report was approved by CCMA, LLC's board of directors on April 30, 2026.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in my capacity as Chief Financial Officer and Chief Risk Officer, 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.



Brian Dempsey
Chief Financial Officer and Chief Risk Officer

May 27, 2026

I have the authority to bind CCMA, LLC.