



## Responding to Forced Labour in Canadian Supply Chains

Forced labour can be found in every country and every sector. The International Labour Organization estimates that there are approximately 27.6 million victims of forced labour worldwide, including 17.3 million in the private economy. Forced labour and child labour risks occur primarily through the global supply chains of businesses. There is a risk that goods imported into and distributed in Canada were produced with forced labour or child labour. Entities and government institutions doing business in Canada have a responsibility to ensure that exploitative practices are addressed and eradicated from their supply chains.

As part of this, General Recycling Industries Ltd. (“General Recycling Industries”) has taken steps in their previous fiscal year to ensure the entity is responding to the risks associated with these exploitative practices.

### Entities Covered by the Report

This report is an initial report for the entity enlisted below. The entity does not have reporting obligations for any other jurisdictions.

<b>Entity</b>	General Recycling Industries
<b>Legal Name</b>	General Recycling Industries Ltd.
<b>Reporting Year</b>	March 1, 2023 to February 29, 2024
<b>Business Number</b>	13253 9024
<b>Entity Category</b>	Corporation
<b>Sector/Industry</b>	Metal Recycling
<b>Location</b>	Edmonton, AB

### Structure, Activities and Supply Chains

General Recycling Industries is a corporation operating in Edmonton, Alberta, and mainly consolidates, processes, and sells scrap metals for recycling into new steel products. For over 45 years, General Recycling has remained committed to the planet, its people, and its community by creating a comprehensive recycling program that effectively meets the needs of its industry’s demands. General Recycling has invested in technologically innovative products and processes to help protect the environment.

The entity employs over 80 staff at its Edmonton, Alberta location.

The entity purchases and processes over 200,000 net tons of recyclable metal products each year, with all suppliers being local to Alberta and BC.

The main suppliers of goods for General Recycling Industries include large industrial organizations, metal fabricators, construction companies, automobile wreckers, and smaller, local scrap consolidators and peddlers of recyclable metal products. A large majority of these suppliers operate within the Edmonton area.

The main supply of goods to General Recycling consists of end-of-life automobiles, appliances, and other white goods, as well as scrap metal from many construction and industrial companies in the local area. As such, there is not a traditional supply chain to speak of.



## Policies and Due Diligence Processes

General Recycling Industries is committed to a strong health and safety program designed to protect its staff, property, environment, and the public. General Recycling Industries believes everyone is entitled to a safe work environment.

In fulfilling this commitment General Recycling Industries strives to:

- Comply with all municipal, provincial, and federal legislative requirements.
- Continually assess and control risks that may arise from its work and its activities.
- Provide effective information, instruction, and training.
- Ensure safe work practices.
- Monitor and review policies, processes, and procedures to ensure effectiveness.
- Develop and maintain a positive health and safety culture through open communication with its employees.

Beyond these general values, General Recycling Industries lays out a specific mission, vision and has strong values communicated to each employee as part of their onboarding process.

### Mission

“Our customers mean everything; and we are committed to mean everything to our customers.”

### Vision

“Our vision is to be the leader in our business; in the eyes of our customers, our employees, and in the community in which we operate.”

### Values

Values communicated to employees that are strictly related to forced and child labour in our supply chains is as follows:

- Integrity – In the course of conducting our business, we will do the right thing, even when nobody is watching.
- Trust – We are reliable, dependable, and accountable for our actions. This is reflected through the quality of our service, the dependability of our products and in all that we do every day.
- Respect – We will demonstrate fairness, consistency, and compassion in all our interactions with others.
- Safety – We will strive to maintain an incident free workplace and to exceed existing safety standards by building and maintaining a culture of compliance and a framework of shared responsibility.
- Leadership – We will foster leadership at all levels by believing in the dedication of our employees, encouraging innovation, promoting excellence and opportunities to grow.



## Employee Handbook and Code of Conduct

Within the Employee Handbook, we provide employees with a Code of Conduct Statement, denoting that all employees of the company, including each of the Company's officers, is responsible for conducting the Company's business in a manner that demonstrates a commitment to maintaining highest standards of integrity.

Along with further details on how to uphold the above values of the Company.

## Employee Rights and Fair Treatment

The company also communicates in its Employee Handbook details on Employee Rights and Fair Treatment.

## Employee Recruiting, Onboarding and Payroll Processes

During recruiting, the entity has policies and procedures to ensure all potential employees are eligible to work in its jurisdiction, are of a reasonable age to work in that jurisdiction and meet all statutory and regulatory requirements to work in the jurisdiction they will be employed in. During onboarding, staff are required to acknowledge the Employee Code of Conduct and Employee Handbook.

Our payroll will not deposit pay cheques to accounts where the employee is not specifically named as an account holder.

## Supplier Code of Conduct

Further to demonstrate General Recycling Industries' commitment to responding to forced and child labour in its activities and supply chains, General Recycling Industries has developed a *Supplier Code of Conduct*. This code outlines the policies, procedures, and activities all General Recycling Industries' suppliers must undertake to ensure that these suppliers adhere to high standards of safe working conditions, fair and respectful treatment of employees and overall ethical practices and standards.

It includes sections on ethical business standards, anti-corruption, health, and safety, as well as specific sections on forced and child labour. On a prospective basis, General Recycling Industries will incorporate this Code of Conduct in its supplier pre-qualification process.

## Forced Labour and Child Labour Risks

General Recycling Industries is continually assessing its activities and supply chains for areas that may carry a risk that forced labour or child labour is being used. In its assessment of its activities and supply chain, General Recycling Industries did not identify any areas that carry a risk that forced, or child labour is being used.

## Remediation Measures

General Recycling Industries did not identify any areas of their activities or supply chain that carry a risk that forced, or child labour is being used. As such, no remediation measures to respond to these risks or loss of income of most vulnerable families or individuals is necessary.



## Training

General Recycling Industries does not provide explicit training specific to forced labour and child labour in its activities and supply chain. During onboarding, and at regular intervals, employees of the entity are required to acknowledge the Employee Handbook and Employee Code of Conduct. Elements of the Employee Code of Conduct are discussed above in this report and include specific sections on ethical behavior and actions as well as upholding the values of the entity.

## Assessing Effectiveness

General Recycling Industries will continue to monitor potential risks of forced and child labour in its activities and supply chain. At the current time, the entity believes its policies and procedures are sufficient to address the potential risks of forced and child labour in its activities and supply chains.



## 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 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.

Name: Kevin Swerling

Title: General Manager

Signature: 

Date: May 30, 2024

I have the authority to bind General Recycling Industries Ltd.