



Cherubini Anti-Slavery Report

Reporting Year 2024

Our Company our Responsibility

Cherubini Metal Works Limited (Hereinafter "Cherubini"), is the largest and foremost steel fabrication company in Atlantic Canada and is a major industry force in the provision of Canadian steel fabricated products for both structural steel and bridge steel applications both in Canada and abroad. Cherubini fully recognises that slavery, servitude, forced labour and human trafficking ("modern slavery") is a significant global issue of the highest importance.

Cherubini has a zero-tolerance policy towards modern slavery and its related human oppressions and fully supports the introduction of Bill S- 211 and welcomes the implementation of An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains (Hereinafter the "Act").

Cherubini, as an ethical pillar of its business, does not knowingly use child labour or forced labour in any of its operations nor does it knowingly accept supplies, products and/or services from suppliers that employ the use of forced labour and/or child labour.

The following is a statement of the steps that we have currently taken and will continue to maintain (the "measures") to prevent modern slavery in our activities and supply chains.

Our business and Our supply chain

Cherubini was incorporated on October 12th, 1967, in the Province of Nova Scotia, Canada, under the leadership and vision of two brothers, John Cherubini and Giacomo Cherubini, both first-generation immigrants from the Country of Italy who brought their families to Canada for a better life. John Cherubini was quickly joined by his future son-in-law, Danilo Gasparetto, in the operation of the established family business. Danilo Gasparetto and his brother Renato Gasparetto took over the business from John Cherubini and Giacomo Cherubini in 1972 and have never looked back. Cherubini has continued to expand its operations from its humble beginnings and has developed into a major contender in the steel fabrication industry in Canada and the United States. Cherubini's steel fabrication operations are completely based in Dartmouth, Nova Scotia, Canada.

Our supply chains for consumables used in the fabrication process of our steel products are based primarily in Dartmouth, Nova Scotia, Canada. Our raw steel products are sourced from Steel Mills in both Canada and the United States. Despite our locally based supply chains and those farther a field in Canada and the United States, Cherubini has, and will continue to send information memos and notices to all of its suppliers advising them of the requirement to verify all sources of their supplied products. In this regard Cherubini has and will continue to work with its supply chain partners to verify and ensure that no products or services being provided utilize

child labour or forced labour. In addition, Cherubini is in the process of updating its standard Purchase Order Form to include wording that all materials supplied by its suppliers must not include Forced Labour and/or Child Labour. The Purchase Orders will go on to state that should Cherubini become aware of the incorporation/use of Forced Labour and/or Child Labour in any products from their suppliers that this will be immediate grounds to terminate the purchase of supplies from that identified supplier.

Human Rights Policy

Cherubini has established a Human Rights related Policy since October 2016 to declare our respect for all individuals, and to confirm that we will not accept any abuse of human rights within our business operations and will investigate any allegations of abuse that are brought to our knowledge.

Due diligence

As an outcome of a Cherubini internal Management risk assessment exercise, we recognize that our greatest risk of exposure to modern slavery arises from our supply chain, but we do take some comfort in knowing that our suppliers are primarily based locally in Nova Scotia and in North America. This fact, in itself, reduces the risk of accepting products from Non-North American countries that may have known human rights violations of forced labour and child labour practices.

To address our supply chain risks, we have bolstered our due diligence processes into our suppliers (including contractors and consultants) to ensure that any new business partners share our high regard for human dignity. If we uncover examples of negative labour practices or circumstances that may compromise the welfare of our workforce, we will not enter a business relationship or a project with such counterparty. We have circulated this Anti-Slavery Report amongst our Project Management team so that they are fully aware of the Act and can communicate our requirements to our suppliers.

Cherubini does not condone or tolerate forced labour and insists on appropriate protections for all labour forces involved with our business. We adhere to all Immigration Canada policies and regulations concerning the hiring of Temporary Foreign Workers involved with our operations.

Cherubini acknowledges and governs its employee work force relations in accordance with the Nova Scotia Labour Standards Code, the Nova Scotia Occupational Health and Safety Act, and the Nova Scotia Human Rights Act. As already indicated, Cherubini's operations are entirely based in Dartmouth, Nova Scotia, Canada.

Contractual policies

Cherubini, given the recent introduction of Bill S-211, will be insisting that all identified suppliers will incorporate into their standard supply contracts language that:

- Incorporates obligations on suppliers to comply with the "Act",
- Notify Cherubini if they become aware of any modern slavery within their supply chains,
- And cooperate with any audits into their business practices required by Cherubini to verify their supply source, and

- That Cherubini has the right to immediately terminate any supply contract that is shown to involve Forced Labour and/or Child Labour.

Assessment of effectiveness

Cherubini has only now initiated its procedures to address the risk of Forced Labour and Child Labour and as such has no data to report on effectiveness at this time. Cherubini will continue to monitor its operations and insist on the cooperation of all suppliers in achieving the desired goal of zero risk of Forced Labour or Child Labour being utilized in any of its fabricated products or supply chain products.

Approval and attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for the entity or entities listed above. Based on our knowledge, and having exercised reasonable diligence, we 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.

Respectfully submitted and dated at Dartmouth, Nova Scotia, Canada on May 23rd, 2024.

We have the authority to bind Cherubini Metal Works Limited.


Renato Gasparetto, Director


Danilo Gasparetto, Director


Marc Edward Gasparetto, Director


Michael Lancaster Gasparetto, Director

