



2025 Modern Slavery Report

Fighting Against Forced Labour and Child Labour in Supply Chains Act

Introduction

Windsor Salt Ltd./Sel Windsor Ltée, a British Columbia corporation (the “Company”), supports the objectives of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). This report describes the steps Windsor Salt Ltd. took during fiscal year 2025 to prevent and reduce the risk of forced labour and child labour in its operations and supply chain, as required under the Act. This is the third report prepared by the Company under the Act.

Company Overview

Founded in 1893, we are headquartered in Pointe-Claire, Quebec, Canada. With more than 600 employees in Ontario, Quebec, Nova Scotia, and Saskatchewan, we are Canada’s largest salt manufacturer. We produce and sell salt for highway de-icing and industrial applications, as well as packaged de-icing products, water softening products, and food-grade salt products. Most of our sales are made to customers in Canada, and 100% of our employees and facilities (e.g., rock salt mines, evaporated salt plants, processing facilities, warehouses, and offices) are located in Canada.

We are owned indirectly by SCIH Salt Holdings Inc. a/k/a The Morton Salt Group, a privately-held company headquartered in Overland Park, Kansas (United States) that owns a portfolio of salt companies in the Americas.

Our direct supply chain consists primarily of procuring the transportation (vessel, rail and truck) necessary to move products from our facilities to our customers, the overwhelming majority of which are located in Canada. We also purchase equipment, packaging, materials and ingredients, most of which are made and sourced from suppliers located in Canada or the United States.

Fiscal 2025 Actions

During the fiscal year that ended September 30, 2025, the Company took the following actions to help prevent and reduce the risk that forced labour or child labour is used in its operations or supply chain:

Policies and Governance

- The Company published its Child Labour Remediation Policy to confirm its commitment to preventing the use of child labour in the production of our products. The policy strictly prohibits child labour, forced labour, and human trafficking and outlines the actions to be taken if an incident is identified within the Company’s operations or supply chain.

- The Company reviewed its Human Rights Policy which reiterates its opposition to child labour, forced labour, and human trafficking. The policy encourages open and honest communication with employees without fear of retaliation, intimidation or harassment and reinforces expectations that business partners comply with the Company's Supplier Code of Conduct.
- The Company reviewed its Code of Business Conduct and Ethics, which requires employees to participate in annual compliance training and to report any suspected forced labour, child labour or human trafficking. The Code provides reporting resources and prohibits retaliation against individuals who report concerns in good faith.

Supplier Standards and Contractual Controls

- The Company reviewed its Supplier Code of Conduct and our Standard Purchase Order Terms for Purchase of Goods and Services to assess whether changes or updates were appropriate.
- The Supplier Code of Conduct sets out the Company's expectation that suppliers will not participate in, and will prohibit, forced labour, child labour, or human trafficking and will comply with applicable laws.
- The Standard Purchase Order Terms incorporate the Supplier Code of Conduct and require vendors and suppliers to comply with its provisions.

Reporting and Accountability Mechanisms

- The Company maintained a free and confidential compliance hotline, hosted by an independent third-party reporting service. The hotline is available to employees and third parties via telephone and the Company's website and is referenced as part of annual compliance training.
- The Company continued to require employees to report suspected forced labour, child labour, or human trafficking through established reporting channels.

Vendor Due Diligence

- The Company performed commercial diligence on potential vendors and suppliers prior to onboarding.
- The Company continued to conduct business with reputable vendors and suppliers, many of whom are subject to regulatory oversight.

Employment and Labour Practices

- The Company continued to demonstrate employment and labour practices aligned with its corporate values of integrity, empowerment, excellence, teamwork, and agility.
- These practices include the use of clearly written employment agreements, benefit materials, and policies that specify employee rights related to compensation, retention of personal identification documents, and other matters relevant to preventing forced labour and child labour.

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- The Company complied with applicable federal and provincial laws governing employee rights and benefits.
- Internal controls were maintained to ensure that employees and independent contractors are recruited voluntarily.

Heightened Areas of Risk

Windsor Salt Ltd.'s employees and operations are based solely in Canada, and the majority of its vendors and suppliers are located in Canada or the United States. These jurisdictions have well-defined legal and regulatory frameworks that help mitigate the risk of forced labour and child labour.

Workforce and Operations Risk

- All Company employees and facilities are located in Canada.
- The vast majority of hourly employees are covered by union collective bargaining agreements.
- The Company is subject to federal and provincial employment laws that impose minimum age requirements and other protections relevant to preventing forced labour and child labour.
- Additional risk mitigation measures for new employees include post-offer, pre-employment background checks, work eligibility verification, onboarding processes, and compliance training.

Based on these factors, the Company considers the risk of forced labour or child labour within its direct operations to be low.

Supply Chain Risk

The Company's direct supply chain primarily involves:

- Transportation services (vessel, rail, and truck) used to deliver products to customers, and
- The purchase of equipment, packaging, materials, and ingredients.

Most of these goods and services are sourced in Canada or the United States.

The Company believes that the areas of its business and supply chain with the greatest potential risk of forced labour or child labour relate to the direct or indirect purchase of goods that may be manufactured in underdeveloped countries with legal and regulatory frameworks that are less rigorous than those in Canada and the United States. The Company cannot quantify this risk and does not consider it to be significant given the nature of its operations and sourcing practices.

Risk Mitigation Measures

To the extent that such risks may exist, the Company seeks to mitigate them through a combination of measures, including:

- Maintaining a comprehensive compliance program that includes its Code of Business Conduct and Ethics, Supplier Code of Conduct, Standard Purchase Order Terms, Human Rights Policy, Child Labour Remediation Policy, and related protocols.
- Conducting business primarily with reputable vendors and suppliers, many of whom are subject to regulatory oversight.
- Conducting business with customers that are often subject to regulation and that maintain robust compliance programs, including supply chain oversight and audit or inspection rights.
- Communicating the Company's Code of Conduct expectations through compliance training and information made available on the Company's intranet and facility bulletin boards to raise employee awareness.

Remediation

During fiscal year 2025, the Company did not identify any instances of forced labour or child labour within its operations or supply chain.

As a result, the Company did not take any measures to remediate:

- any forced labour or child labour, or
- the loss of income to the most vulnerable families that may result from measures taken to eliminate forced labour or child labour.

The Company maintains policies, procedures, and reporting mechanisms designed to support remediation if an incident were to be identified in the future, including its Child Labour Remediation Policy and established employee and third-party reporting channels.

Assessment of Effectiveness

During fiscal year 2025, the Company did not take actions for the express purpose of assessing the effectiveness of its measures to prevent and reduce the risk of forced labour or child labour in its operations and supply chain.

The Company's approach during fiscal year 2025 focused on maintaining and applying existing policies, procedures, and controls intended to prevent forced labour and child labour, including its Code of Business Conduct and Ethics, Supplier Code of Conduct, Human Rights Policy, Child Labour Remediation Policy, contractual controls, and reporting mechanisms.

While no formal effectiveness assessment was conducted during the reporting period, the Company continues to monitor compliance through established governance processes, employee reporting mechanisms, and vendor management practices. The Company may consider implementing more formal methods to assess effectiveness in future reporting periods, as appropriate, based on the nature and risk profile of its operations and supply chain.

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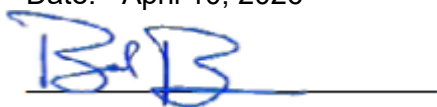
Approval

Our board of directors approved this report on April 10, 2026.

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: Brad Bacon
- Title: Director; Senior Vice President, Chief Administrative Officer & General Counsel
- Date: April 10, 2026



I have the authority to bind Windsor Salt Ltd./Sel Windsor Ltée

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