

# LINDFAST Solutions Group

## Report on Forced Labor and Child Labor in Supply Chains

### Structure and Activities of Reporting Entities

This report is submitted jointly on behalf of Lindstrom, LLC ("Lindstrom" or "we") and its subsidiary Lindstrom Fastener (Canada) Ltd. ("Fastener"). Lindstrom, LLC consists of five subsidiary companies: Lindstrom Fastener, Ltd. (Canada), Stelfast, Inc. (US), Lindstrom RE, LLC (US), Star Stainless Steel Co (US), and Big Bolt, LLC (US) that operate across Canada and the United States, collectively doing business as LindFast Solutions Company ("LindFast" or "LSG"). Chiang Shin Fastener Company, Ltd. (Taiwan) is a subsidiary of Lindstrom Fastener Canada. Headquartered in Blaine, MN, USA, LindFast employs approximately 1,245 total individuals across its subsidiaries, including 134 employees located within Canada.

LindFast operates a family of independently marketed brands, including Lindstrom, LLC, Stelfast, Inc., Mega, LLC, Solution Industries, Metallurgic Test Lab, Fasteners & Fittings Inc., Star Stainless Screw, Chiang Shin Fasteners, Hi-Q Fasteners, Merco Tape, and Big Bolt, LLC. LindFast and its associated subsidiaries and brands are Master Fastener Distributors. The company imports Fasteners (i.e. nuts, bolts, washers, screws) and other related products that are generally manufactured overseas. Fasteners are stored in warehouses in the USA and Canada and primarily sold to other distribution companies wholesale. LindFast serves a broad base of national, regional, and local distribution customers across the North American market through its family of brands.

### Governance and Scope of Report

This report is made pursuant to the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211) and covers the measures taken by LindFast to prevent and mitigate forced and child labor risks in our operations and supply chains for the year ending December 31, 2024. LindFast is committed to upholding human rights and responsible sourcing standards in alignment with global procurement frameworks, including the United Nations [Guiding Principles on Business and Human Rights](#) and the OECD [Guidelines for Responsible Business Conduct](#).

LindFast's executive leadership formally reviews and approves this statement annually, ensuring senior accountability for modern slavery and child labor risk management across its global procurement activities. This report is aligned with the commitments codified in LSG's Supply Chain Labor Practices Policy (see Supply Chain Labor Practices Policy section), which details LindFast's expectations for employees and business partners, including suppliers, agents, and designated third parties. LindFast explicitly prohibits all forms of forced labor, child labor, and human trafficking, and details mandatory controls for suppliers and other third-party partners to mitigate related risks, the which are incorporated by reference into supplier contracts and purchasing agreements.

## Supply Chain Overview

As a master distributor, LindFast serves a critical role in the fastener supply chain by offering a deep inventory as a “virtual warehouse” of approximately 210,000 low volume, slow moving stock keeping units (“SKUs”). Distribution customers require rapid access to LindFast’s virtual warehouse SKUs to fulfill customer orders; however, the wide variety of SKUs are non-economical for distributors to independently source and inventory. These SKUs represent high-touch, specialty products that can be difficult to source due to their unique length, diameter, thread pitch, metal choice, or finish.

Given the importance of SKU availability across its product inventory, the LindFast supply chain is critical to LSG’s continued success. The company sources metal components (including screws, bolts, nuts, anchors, and studs) from suppliers worldwide. LindFast maintains a global supplier base spanning multiple countries, with primary sourcing activities from China, Taiwan, the United States, Thailand, and India. Additional procurement occurs, to a lesser extent, from Korea, Germany, Hong Kong, Japan, Malaysia, Italy, Canada, Mexico, and the United Kingdom.

LindFast prides itself on long-standing relationships with its global suppliers, many stretching decades of partnership. Due to its deep supplier engagements and frequent touchpoints, LindFast maintains ongoing visibility into supplier operations and production standards. When material new suppliers are onboarded, LindFast conducts comprehensive screening into their operations to ensure alignment with global procurement standards.

## Supply Chain Forced and Child Labor Risks

While LindFast has not performed exhaustive risk assessments of product components and raw materials, we recognize that our participation in the broader manufacturing and metals industries and our upstream sourcing of raw materials expose the company to potential forced and child labor risks within our supply chain. In particular, LindFast’s operations and supplier relationships in Taiwan and China correspond to regions identified in the U.S. Department of Labor’s 2024 [International Child Labor & Forced Labor Reports](#) as higher-risk for goods produced by vulnerable labor. Specifically, LindFast is aware of present risks of forced labor in the Xinjiang Autonomous Region in China, as regulated by the U.S. Uyghur Forced Labor Prevention Act (UFLPA).

LindFast is committed to conducting its operations in an ethical manner that respects and upholds internationally recognized human rights standards, including the prohibition of child and forced labor. The company does not knowingly engage with any suppliers that are associated with a risk of involvement in child or forced labor practices. To date, LindFast has not conducted business with any supplier known to have experienced an incident involving child or forced labor. The company recognizes the heightened risks associated with certain geographic regions and raw materials and remains committed to ongoing due diligence. LindFast will continue to monitor guidance issued by the U.S. Department of Labor and other relevant governmental authorities to remain informed of evolving risks related to products and countries of concern.

## **Supply Chain Labor Practices Policy and Training**

The entity has adopted a company-wide Supply Chain Labor Practices Policy that establishes clear standards prohibiting forced and child labor across all subsidiaries, business partners, and vendors. This Policy is embedded in the company's employee handbook, and all employees are required to formally acknowledge their commitment to its implementation.

The Supply Chain Labor Practices Policy incorporates a comprehensive set of provisions aligned with internationally recognized human rights and labor standards frameworks, including those established by the International Labour Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights. The Policy mandates strict adherence to all applicable legal requirements concerning human trafficking, child labor, and forced labor. In addition to explicit prohibitions on forced labor, modern slavery, human trafficking, and child labor, the Policy requires compliance with standards addressing fair wages and benefits, reasonable working hours, freedom of association, non-discrimination, and the maintenance of a safe and healthy work environment.

All employees receive training on the employment practices and working conditions codified in the company's policies, including those addressing involuntary labor, human trafficking, child labor, and forced labor. For employees in procurement, quality assurance, and other supplier-facing functions, the Policy's provisions are embedded in supplier management protocols and reinforced through supplementary training covering supplier monitoring and audit processes. Select employees also receive third-party training on supply chain forced and child labor risk mitigation best practices.

## **Supply Chain Risk Mitigation and Remediation Practices**

LindFast actively monitors applicable regulatory requirements in the jurisdictions in which it operates. As new developments in supply chain regulation emerge, the company issues communications to suppliers in the relevant geographies, requesting formal attestation of compliance with such requirements. LindFast also actively reviews the U.S. Department of Labor's International Child Labor & Forced Labor Reports for exposure to higher-risk geographies within its value chain.

LindFast requires all foreign suppliers are required to affirm that no form of forced labor is utilized in connection with any purchase order, and requirements to mitigate risk of forced and child labor are included in standard supplier terms and conditions. LindFast also mandates completion of a certification form, whereby suppliers declare that forced labor is not used in the production of any merchandise sold to LindFast. This certification further obliges suppliers to promptly notify LindFast should any credible evidence of forced labor be identified within their operations. Certification of supplier labor standards pursuant to the Forced Labor Survey and contractual terms is monitored on an ongoing basis to ensure ongoing compliance across Lindfast's supplier base.

LindFast conducts site visits and audits for its primary suppliers located China and Taiwan, as the regions with the highest exposure to forced and child labor that LindFast is aware of. While supplier audits are focused on quality assurance and other product-related considerations, Lindfast's Quality

and Procurement functions also screened suppliers for forced and child labor during site visits. Labor screening practices include collection of forced and child labor prohibition policies and hiring documents verifying employee age in alignment with global working standards.

LindFast may, in the future, broaden the scope of its policies, audit frameworks, and other risk management practices to further mitigate and address supply chain labor risks which are endemic to the metals supply chain. At present, the company does not maintain defined procedures for the remediation of identified incidents of forced or child labor, nor for the remediation of any potential forgone income related to its efforts to mitigate such risks. LindFast acknowledges that efforts to mitigate the risk of forced and child labor may unintentionally result in adverse economic impacts on vulnerable populations, including the potential loss of income. However, LindFast has not encountered any incidents to date that would necessitate the remediation of labor violations or adverse economic impacts within its supply chain.

### **Supply Chain Programmatic Evaluation**

LindFast does not presently maintain specific key performance indicators or formalized evaluation frameworks to assess the effectiveness of its management of forced and child labor risks within the company's supply chain. As LindFast's responsible procurement program matures, the company intends to design and implement enhanced supply chain governance measures, which may include the development of quantitative performance metrics, codified assessment methodologies, and strengthened policies and procedures, to ensure rigorous due diligence. Further efforts to enhance labor and human rights will facilitate the company's capacity to detect, prevent, and remediate any instances of forced or child labor across its operations and supplier network.

### **Attestation of Approval**

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.

Signed,

Vasilios (Bill) Niketas  
Chief Executive Officer  
May 25, 2025



I have the authority to bind the reporting entities represented in this report: Lindstrom LLC ("Lindstrom") and its subsidiary Lindstrom Fastener (Canada) Ltd. ("Fastener"), collectively DBA LindFast Solutions Company ("LindFast" or "LSG").