



Quantum Lifecycle Partners LP

Financial reporting year: February 1, 2023 to January 31, 2024

Business number: 132132457

Sector/industry: Administrative and support, waste management and remediation services

Headquartered in: Ontario, Canada

Meeting Bill S-211 – Fighting Against Forced Labour and Child Labour in Canadian Supply Chains

The following document includes information on how [Quantum Lifecycle Partners LP](#) addresses each of the legal requirements in subsections 11(1) and 11(3) of Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (“the Act”).

11(1) A description of the steps taken to prevent and reduce risks of forced labour and child labour, as per subsection 11(1)

Quantum Lifecycle Partners has certifications for [R2v3](#) (responsible recycling), [ISO9001](#) (quality management), [ISO14001](#) (environmental management system), and [ISO45001](#) (health and safety) in eight of the 12 sites. The remaining four facilities follow requirements of these certifications, but are not audited.

Quantum is compliant to the [Responsible Business Alliance](#) (RBA) and is required to adhere to and be accountable for a set of requirements for responsible business conduct in global supply chains.

Specifically, the [RBA Code of Conduct](#) requires Quantum to commit to the following: forced labour, including slavery and human trafficking, is strictly prohibited; workers should have freedom of movement within the workplace and access to facilities; work must be voluntary; child labor is strictly prohibited in all manufacturing stages; workers must not face harsh, inhumane treatment or discrimination; and more.

To ensure broad compliance at Quantum, all new employees are asked to show proof of eligibility to work in the country. Quantum confirms a worker’s age and does not employ any persons under the age of 18.



Quantum performs internal audits and is audited by external organizations annually to ensure compliance with our standards and commitments (see 11(3)-g).

Finally, to ensure compliance within our supply chain, Quantum has a downstream survey and approval process for new vendors. Vendors must sign they are not using forced or child labour. Moreover, downstream partners must be certified to the first R2 facility if they are accepting focus materials.

11(3) Supplementary information addressing each of the seven requirements in subsection

a. Its structure, activities and supply chains

Quantum Lifecycle Partners LP is both an IT asset disposition (ITAD) company and an end-of-life electronics recycler. Quantum was formed in September 2019 through the acquisition of assets from Shift Recycling Inc. and GEEP (Global Electric Electronic Processing). The company is a Limited Partnership with two groups of shareholders with expertise in the metal recycling industry: [Combined Metal Industries](#) and the [Giampaolo Group](#).

Quantum has 11 locations across Canada and 1 location in Costa Rica with a workforce of over 600 employees.

The company primarily receives electronics for reuse and recycling from small to large sized companies, government, individual drop-off locations and more.

We sell repaired and refurbished electronics for reuse to consumers and companies in Canada, the United States and, to a lesser extent, internationally. All other material is sent to approved downstreams.

There is some transfer of material from Quantum's Costa Rica site to Barrie, Ontario for specialized processing.

b. Its policies and its due diligence processes in relation to forced labour and child labour

As part of Quantum's R2v3, ISO9001, ISO14001, ISO45001, and RBA certifications and commitments, the company has several policies that relate to forced labour and child labour.



At Quantum, all employees are trained on their rights and freedoms of their provincial ministries of labour. This training happens annually as part of our health and safety policy fulfillment.

Quantum has the RBA Code of Conduct which all supervisors must follow. This Code of Conduct covers freely chosen employment, no child labour, fair wages, humane treatment and more.

Quantum has 35 other policies including: an EQHS Policy for environmental, quality, health and safety; an Unsafe Work policy; a Civil and Respectful Workplace policy; a Purchasing policy for employees responsible for purchasing materials, services and equipment to ensure health and safety risks are considered as well as meeting relevant standards and legislation; a Communication policy which outlines internal and external communications; and more.

As part of the management system, all policies are available to employees in English and French. From there, standard operating procedures flow out of the policies to action the commitments within the company.

c. The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk

Quantum's own internal controls and processes identify there are no activities we participate in that there is a significant risk of forced or child labour. This is especially true for the operations in Canada and Costa Rica, where the company has direct control and is audited annually.

International supply chains may have more inherent risk due to Quantum having less direct control and oversight.

However, our R2v3 certification, which requires downstream vendors be approved, and our compliance with the Basel Convention – which protects human health and the environment against the adverse effects of hazardous wastes – are the mechanisms we use to minimize supply chain risks internationally.

d. Any measures taken to remediate any forced labour or child labour

Not applicable. No forced labour or child labour has been identified.



e. Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains

Not applicable. No forced labour or child labour has been identified.

f. The training provided to employees on forced labour and child labour

At Quantum, all employees are trained on their rights and freedoms of their provincial ministries of labour. This happens annually.

All Quantum supervisors receive RBA training annually on forced labour and child labour. This training is mandatory. These supervisors are responsible for hiring and managing employees, as well as purchasing and other decisions relating to the supply chain.

This was last completed in May 2024 to 47 employees. It covered all the major elements of the RBA Code of Conduct, as well as the management system and where to find all the documents on the company shared document site.

g. How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains

The Quantum compliance team audits the company's policies and processes annually to verify compliance to all of our standards.

Quantum is audited annually by NSF for the R2v3, ISO9001, ISO14001, and ISO45001 certifications. This includes onsite visits from the auditors.

Quantum is also audited by RQO for the [Electronic Products Recycling Association \(EPRA\)](#) requirements. A third party company audits Quantum for the [Alberta Recycling Management Authority \(ARMA\)](#) standard.

Every three years, a legal compliance matrix is completed by an external auditor to ensure Quantum is in compliance for imports and exports.

Finally, customers also audit Quantum on a regular basis.



Signed 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.

I have the authority to bind Quantum Lifecycle Partners LP.

Gary Diamond

President, Quantum Lifecycle Partners

May 29, 2024

Date