

ARCELORMITTAL CANADA HOLDINGS INC.

Fighting Against Forced Labour and Child Labour in Supply Chains Act

This statement is made by ArcelorMittal Canada Holdings Inc. (“**AM Holdings**”) a subsidiary of ArcelorMittal SA on behalf of itself and its subsidiaries ArcelorMittal Canada Inc., and ArcelorMittal Tubular Products Canada G.P. (collectively the “**Subsidiaries**” and together with AM Holdings, the “**Company**”) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “**Act**”) for the reporting year 2023 and sets out the steps it has taken to prevent and reduce the risk that forced or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Company. As part of the ArcelorMittal group of companies (“**ArcelorMittal Group**”), the Company is committed to preventing acts of forced labour and child labour within its business and supply chain and expects the same from its suppliers and partners.

General Policies and Approach to Forced and Child Labour

Our approach to preventing forced and child labour in our activities and supply chains is set out primarily in the ArcelorMittal Human Rights Policy (which is derived from various International Human Rights Declarations including the United Nations Declaration of Human Rights) and various ArcelorMittal Group policy documents (the “**Policy Framework**”) which is structured to ensure the ArcelorMittal Group operates with the highest level of integrity and compliance with applicable laws. Through the Policy Framework, the ArcelorMittal Group asks its suppliers to have effective management systems in place to achieve the social, environmental and governance objectives to which the Company is committed. The Company also seeks to influence its suppliers to work together to identify further opportunities to improve responsible business practices along the supply chain and develop ongoing performance improvements to the Policy Framework. The following are the main policies of the Policy Framework setting out the Company’s general approach to the risks of forced and child labour:

Code of Business Conduct: Articulates the fundamental legal and ethical principles that guide the Company’s conduct and prohibits the use of forced or child labour. It also sets out the Company’s commitments to a work environment free of harassment and discrimination, promoting occupational health and safety and respecting the environment.

Human Rights Policy: Articulates the Company’s commitment and respect for all human rights in line with the United Nations Guiding Principles on Business and Human Rights. This policy affirms that the Company is opposed to the use of forced labour, child labour, human trafficking and all forms of human rights violations known as “forced labour”, within the Company’s operations and supply chain.

Code for Responsible Sourcing: The Code for Responsible Sourcing (the “**Code**”) sets out the expectations the Company has of its supply chain in relation to human rights, labour, health and safety, the environment and anti-corruption. This includes ensuring that all work is freely chosen and without the use of forced or child labour. The Code is supplemented by a guidance document for the ArcelorMittal Group’s buyers and suppliers which details specific expectations in relation to forced and child labour. Our Code for Responsible Sourcing supports the ArcelorMittal [10 Sustainable Development Outcomes](#) which are aligned with the UN Sustainable Development Goals.

ARCELORMITTAL CANADA HOLDINGS INC.

AM Holdings is a federal corporation and does not produce goods in Canada or elsewhere nor does it import goods produced outside of Canada. AM Holdings controls the Subsidiaries which engage in these activities as highlighted in the following entity specific sections.

ARCELORMITTAL CANADA INC.

ArcelorMittal Canada Inc. is a federal corporation and does not produce goods in Canada or elsewhere nor does it import goods produced outside of Canada. ArcelorMittal Canada Inc. is a subsidiary of AM Holdings and is direct controlling entity of ArcelorMittal Tubular Products Canada which engages in these activities as highlighted in the following entity specific sections.

ARCELORMITTAL TUBULAR PRODUCTS CANADA G.P.

Structure, Activities and Supply Chains

Structure

ArcelorMittal Tubular Products Canada (“**AMTP**”) is a general partnership with operations in Ontario (Brampton, London and Woodstock). AMTP was founded in 1905 and employs nearly 368 employees. AMTP is a subsidiary of AM Holdings.

Activities

AMTP Canada produces approximately ninety thousand net tons of high-quality mechanical steel tubing, automotive components, and welded precision tubes through its manufacturing facilities located in Ontario. AMTP Canada serves a variety of markets (mainly in North America) including automotive, industrial, and construction equipment.

Supply Chain

AMTP’s supply chain generally includes the sourcing of a variety of raw materials and equipment. The main raw material suppliers are located in North America (USA, Canada and Mexico). The main equipment providers are located predominantly in North America (USA, Canada and Mexico) and India. The procurement of goods and services at AMTP is led by procurement teams with support from legal and tax professionals.

Steps Taken to Prevent and Reduce Risks

Risk Assessment and Mitigation

AMTP completes internal risk assessment that focuses on the source of raw materials and equipment and location of supplier and its activities. We prioritize our approach to selectively engage with our suppliers and focus attention on those parts of the supply chain where the risk of violation of our policies is the highest.

Supply Chain Evaluation

Suppliers are subject to due diligence processes and the Code, Code of Business Conduct and Human Rights Policy as part of our supplier registration process.

Contractual Requirements

AMTP's general contracting terms include representations and agreements from the supplier to comply with key policies within the Policy Framework. This requirement subjects the supplier to termination if these policies are violated.

Forced Labour and Child Labour Risks

AMTP recognizes that the jurisdictions in which it sources its goods and services could potentially be directly or indirectly linked to actual or potential risk of forced or child labour and such risks are the focus of the Policy Framework. We have assessed our supply chain and potential risk of exposure exists through our indirect relationships with our equipment suppliers provided that AMTP aims to engage with globally recognized and reputable organizations. Based on AMTP's internal assessment, the level of risk is low as it relates to our raw material providers.

Remediation Measures

The ArcelorMittal Group operates a confidential and anonymous whistleblowing facility on its website, in accordance with its [Whistleblower Policy](#) through which stakeholders may report ethical concerns. AMTP, along with our global assurance team, monitors the volume, type and response to such concerns.

No further measures have been taken to remediate forced labour or child labour in AMTP's activities and supply chains.

Remediation of Loss of Income

No measures have been taken to remediate loss of income in AMTP's activities and supply chains.

Training

All employees are required to be trained and to refresh their training in the Code of Business Conduct and Human rights every three years. In addition to the mandatory training, the Policy Framework is communicated to employees through various channels, including email communications, compliance videos, local targeted trainings and initiatives.

Assessing effectiveness

AMTP conducts an overall Compliance Risk Assessment to identify AMTP's top compliance related risks, including corruption, human rights, forced labour and child labour risks.

Approval and Attestation

This report is approved and attested, as required under subsection 11(4) and subsection 11(5) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.



I have the authority to bind ArcelorMittal Canada Holdings Inc.

Full name: Ed Vore

Title: Director and Vice-President

Date: May 30, 2024