Canadian Statement Against Forced Labour and Child Labour in Supply Chains

pursuant to an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff, referred to as Canada's "*Modern Slavery Act*" (the "**Act**") for the year ending 31st December 2023

1. INTRODUCTION

This is a statement made by Jebsen & Jessen Metals GmbH, in respect of the Act, as referenced above.

Jebsen & Jessen Metals GmbH is a corporation incorporated pursuant to the laws of the Federal Republic of Germany.

2. REPORTING ENTITY

Jebsen & Jessen Metals GmbH, Kehrwieder 11, 20457 Hamburg, Germany

3. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Jebsen & Jessen Metals GmbH is part of the Jebsen & Jessen Hamburg Group (the "group of companies"), a family-run, traditional trading company that has developed its added value into a comprehensive distribution and industrial services company over the last 115 years. As a Hanseatic trading company with Danish roots, the group of companies operates worldwide and has expanded its business activities on all continents.

Jebsen & Jessen Metals GmbH buys and sells and fungible steel products and semi-finished products worldwide. The traded steel products are mainly sold in North America.

The products Jebsen & Jessen Metals GmbH is buying for import into Canada are produced in and originate from: Vietnam, Thailand, Philippines, Greece, Bulgaria, Turkey, Egypt, Morocco, Spain and Mexico.

4. POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

Jebsen & Jessen Metals GmbH is bound by the *Corporate Principles For Respecting Human Rights And The Environment* of the group of companies.

The group of companies respects the UN Guiding Principles on Business and Human Rights (2011) and the guidelines of the International Labour Organization. In 2020, Jebsen & Jessen Hamburg Group joined the United Nation Global Compact, the world's largest voluntary sustainability initiative. In the annual <u>sustainability report</u>, the group of companies reports on its actions and progress – including as to how it follows and realises the visions of the ten principles of human rights, labour standards, the environment and prevention of corruption of the UN Global Compact. The group of companies commits employees and business partners to this by means of corresponding codes of conduct.

When we identify a new potential supplier, an employee from Jebsen & Jessen Metals, or an agent acting on behalf of our company, conducts an on-site visit to the supplier's production facilities. The content of the *Code Of Conduct For Business Partners Of Jebsen & Jessen Hamburg Group*, are discussed with our potential new business partners during these visits.

The *Code Of Conduct For Business Partners Of Jebsen & Jessen Hamburg Group* includes explicit expectations that the group of companies' business partners (including suppliers) will not use or tolerate child labour, forced labour, bonded labour or prison labour. Failure to abide by the principles of the *Code of Conduct For Business Partners of Jebsen & Jessen Hamburg Group* may result in the termination of any or all contractual relations with such business partners.

5. PARTS OF BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR AND STEPS TAKEN TO ASSESS AND MANAGE THAT RISK

The group of companies has analyzed risks in our supply chains, using the 2022 List Of Goods *Produced By Child Labor Or Forced Labor*, issued by the Department of Labor, United States of America, as a reference. The industry we are active in and the products we are trading do not carry an increased risk with regard to forced and/or child labor.

6. MEASURES TAKEN TO REMEDIATE FORCED LABOUR AND CHILD LABOUR

Jebsen & Jessen Metals GmbH did not identify any incidences of forced labour or child labour in our supply chains in fiscal 2023. Accordingly, no measures have been taken to remediate forced labour or child labour in our supply chains or operations in fiscal 2023.

7. MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO MOST VULNERABLE FAMILIES THAT RESULT FROM MEASURES TAKEN TO ELIMINATE USE OF FORCED LABOUR AND CHILD LABOUR

Jebsen & Jessen Metals GmbH did not identify any incidences of forced labour or child labour in our supply chains in fiscal 2023. Accordingly, no measures have been taken to remediate forced labour or child labour in our supply chains or operations in fiscal 2023. As no such measures have been required or undertaken, no measures have been required in order to remediate any associated loss of income.

8. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

Employees are obliged to carry out their work in accordance with our *Code of Conduct for Employees*. The Code of Conduct is available to all employees at all times. Employees are expected to review and comply with the Code of Conduct. Failing to abide by the *Code of Conduct for Employees* may result in disciplinary action, up to and including termination of employment.

We abide by the law and legislation and respect ethical principles. Every one of us who acts for or on behalf of our company assumes responsibility in this regard, be it as an employee, as a consultant or as an agent.

9. HOW ENTITY ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR IS NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS

While Jebsen & Jessen Metals GmbH currently does not employ formal metrics in order to assess its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains, we do actively consider business ethics – including the practices of our suppliers – as part of our internal risk considerations.

ATTESTATION

This report has been approved by the Board of Directors of Jebsen & Jessen Metals GmbH.

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. For clarity, we are providing this attestation in our capacity as a Managing Directors of Jebsen & Jessen Metals GmbH, and not in our personal capacity.

Name: Position:

Ralf Schwarzhaupt Managing Director

Marcus Schindler

Name: Position:

Marcus Schindler Managing Director Jebsen & Jessen Metals GmbH Kehrwieder 11 D-20457 Hamburg

We have authority to bind Jebsen & Jessen Metals GmbH

Date: May 31, 2024