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**Report submitted on behalf of TWB Company under the Fighting Against Forced Labour and Child Labour in Supply Chains Act**

**May 30, 2024**

**Reporting Entity's Legal Name:** TWB Company, LLC

**Business Number:** USA EIN: 38-3044639

**Other jurisdictions with applicable reporting requirements:** None

**Entity categorization according to the Act:** Manufacturing

**Sector/ Industry:** Manufacturing/Steel/Automotive

**Location:** TWB Company is headquartered and principally located in the U.S.

**Reporting year:** June 1, 2022 thru May 31, 2023

This report is submitted on behalf of TWB Company, LLC (referred to as the “Entity” or “TWB”), a leading manufacturer of tailor welded products with 11 strategically located North American facilities supporting just-in-time production and services to automotive customers. <https://www.twbcompany.com/>

TWB does business in Canada and has at least \$20 million in assets for at least one of its two most recent financial years. It generates at least \$40 million in revenue for at least one of its two most recent financial years and employs an average of at least 250 employees for at least one of its two most recent financial years.

## **SUMMARY**

Based in Monroe, Michigan, TWB is a leading manufacturer of tailor welded products. Its production facilities are located in Canton, MI; Monroe, MI; Valley City, OH; Smyrna, TN; Antioch, TN; Glasgow, KY.<sup>1</sup>

Over the past 25 years, TWB has developed the tailor welded blank market in North America and is the leading manufacturer of tailor welded products. Its products include: tailor welded blanks; tailor welded coils; hot formed tailor welded blanks; and aluminum tailor welded blanks. Tailored products allow product design engineers to optimize part design from a variety of aluminum or steel blanks or coils. This results in reduced part weight and cost while maintaining or increasing performance. Another significant benefit of tailored products is improved coil nesting. The same materials can be welded together to improve material utilization of individual components or to produce a blank or coil at a width that cannot be rolled or coated by conventional mill processing.

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<sup>1</sup> TWB is majority-owned and operated by Worthington WSP LLC (a Michigan LLC), which is ultimately owned by Worthington Steel, Inc. Worthington Steel is North America's premier value-added steel processor and producer of market leading consumer and building products. Worthington has 55% ownership. Remaining 45% minority ownership (non-operating partner) is Baosteel Tailored Blanks International GmbH, headquartered in Duisburg, Germany. While Baosteel Tailored Blanks International GmbH (German company) is ultimately owned by BaoSteel (Chinese company), TWB's supply chain has no connection to Chinese supply chains.



TWB Company primarily manufactures for the automotive industry. Tailor Welded Blanks are made from individual sheets of steel of different thickness, strength and coating which are joined together by laser welding. This manufacturing process allows for flexible part design and ensures the right material is used in the right place. Thicker or higher-strength material can be used in highly stressed areas while thinner sheets or deep drawing grades can be used in others. Expensive materials are only used where they are needed. This targeted approach has many benefits including cost reduction, reduced weight, and increased strength. Thus, there are various performance and cost advantages of these products.

<https://www.twbcompany.com/products/>

Tailor Welded Blanks of Canada, Inc has one facility in Cambridge, Ontario. This entity has similar automotive manufacturing and customer-base as TWB Company. Tailor Welded Blanks of Canada, Inc does not meet the reporting thresholds for Bill S-211.

As a North American company that sources steel mostly from the U.S., TWB is not exposed to significant risk associated with the use of forced or child labour. A small percentage of material is sourced from Canada and Germany. Almost all material is sourced on a “resale” or “directed buy” program with customers responsible for selecting sources. Those customers (primarily large automotive OEM’s) also have policies related to ensuring no forced labour or child labour is part of their supply chains.

Nonetheless as a Worthington Steel, Inc. company,<sup>2</sup> TWB adheres to Worthington’s Supplier Codes of Conduct. Its Code of Conduct specifically addresses its belief in respecting and promoting the fundamental human rights of all individuals and expresses its commitment to compliance with human rights laws, rules and regulations in places where it does business. It further states that it will not tolerate any form of human trafficking or forced, involuntary, slave or child labour in the conduct of our business operations or in our supply chains.

Worthington’s Supplier Code of Conduct also addresses labour and human rights issues. It specifies that “suppliers shall not use any form of child labour within their organization or purchase materials or services from companies using underage labour.” It also requires that “suppliers shall not use any form of forced, involuntary or slave labour within their organization or purchase materials or services from companies using forced, involuntary, or slave labour.”

#### **1. The Entity’s policies and due diligence processes in relation to forced labour and child labour**

As previously noted, as a North American manufacturing company that mostly purchases its raw material, steel and aluminum, in the U.S. it is not exposed to a significant risk of forced or child labour in its supply chains. It does not source steel from China. Nonetheless, TWB adheres to Worthington Steel’s Supplier Code of Conduct which has a zero tolerance for any form of human trafficking or forced, involuntary, slave or child labour in the conduct of its business operations or in its supply chains.

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<sup>2</sup> TWB and Tempel Steel are both Worthington Steel companies. The two companies are submitting their reports separately.



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**2. The Parts of the Entity’s business and supply chains that carry a risk of forced labour or child labour being used and the steps the Entity has taken to assess and manage that risk**

TWB processes steel mainly sourced from the U.S. into products for the automotive sector. As such, it has very low exposure to forced labour or child labour in its business and supply chains. Nonetheless, TWB adheres to Worthington’s Supplier Code of Conduct which has a zero tolerance for any form of forced or child labour.

**3. Measures taken to remediate any forced labour or child labour**

TWB has not uncovered any forced labour or child labour in its supply chain. In the unlikely event that it does discover a problem, it would address the matter with the supplier which may result in termination of the relationship if the issue cannot be remedied.

**4. 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 since no forced labour in its supply chains has been uncovered.

**5. Training provided to employees on forced labour and child labour**

TWB does not provide training. Its Supplier Code of Conduct does, however, express a zero tolerance for human rights violations. As previously noted, as a company based in North America with a predominantly North American supply chain it is not exposed to significant risk.

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

As previously noted, as a company based in North America with a predominantly North American supply chain, it is not exposed to significant risk.

**7. Training provided to employees on forced labour and child labour**

TWB does not currently provide training for employees on forced and child labour.

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

As previously noted, as a company based in North America with a predominantly North American supply chain it is not exposed to significant risk.



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**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 TWB Company LLC. 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.

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Signature

Date

**Ivan Meltzer**

**President**

**TWB Company, LLC**

*I have the authority to bind TWB Company, LLC*

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