

Modern Slavery and Human Trafficking Statement

Triad Metals, Inc. (“Triad”) is committed to complying with applicable laws and to acting with care, integrity, and responsibility when it deals with its employees, customers, and suppliers and when it interacts with communities. Recognizing the suffering they cause; we do not tolerate any form of slavery or human trafficking in our operations and supply chain. We maintain an unwavering commitment to human rights.

Our organization

Triad is a wholly-owned subsidiary of Metal Traders, Inc. a United States based Corporation. Both Companies are principally engaged in the distribution and processing of ferrous and nonferrous products to steel service centers, structural steel fabricators, and original equipment manufacturers in the United States and Canada. Triad Metals, Inc. is based in Oshawa, ON Canada.

Our policies addressing slavery and human trafficking risk

We are committed to working with suppliers and business partners that do not engage in human trafficking or any form of slavery. Our policies contain provisions that target or contribute to mitigating the risk of slavery and human trafficking in any part of our global business or supply chain.

Our relevant policies include:

Corporate Policy and Guidelines on Business Conduct (Code)

The Code addresses compliance with laws, human rights, privacy, violence prevention, discrimination and harassment, fair dealing with people and organizations and reporting violations. The Code includes guidance on how individuals can anonymously and confidentially report actual or potential misconduct.

Supplier Code of Conduct (SCC)

The SCC forms an integral part of Triad’s supplier contracts. The SCC is principle based and sets out our expectations of suppliers with a goal of aligning supplier behaviours to Triad’s standards in the following key areas: business integrity; responsible business practices; responsible treatment of individuals; and respect for the environment. The SCC includes provisions on forced and child labour, human rights, health and safety matters and ethical behaviours. The SCC seeks to promote transparency and accountability in the supply chain and ensure its principles are considered as part of our procurement and purchasing decisions. To contract with Triad Metals, suppliers must confirm they adhere to the SCC or to an acceptable equivalent. We are committed to working with our suppliers to support compliance with the SCC, including through a contractual right to seek confirmation or to audit to verify whether they meet SCC expectations.

Other policies also contribute to mitigating any form of exploitation including our Company handbook which includes an Employment Equity Policy, Workplace Violence and Harassment Prevention Policy, and Safety Policy.

Policies are updated periodically or as needed by their owners who work closely with all relevant departments within Triad, for accuracy and relevance to changing conditions.

Approval

This statement has been approved on May 28, 2024

Signed by

Matt Sudo

Matt Sudo
Chief Financial Officer
Triad Metals, Inc.