

## **Modern Slavery Report for 2023**

### Introduction

This is the Modern Slavery Report issued by WireCo WorldGroup Inc. ("WireCo" or "the Company") for the year ended December 31, 2023, under the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to Amend the Customs Tariff (the "Act"), published by the Ministry of Public Safety Canada. This is a joint report and includes the relevant entities under common control with the Company to whom the Act applies.

### Structure, Activities and Supply Chain

WireCo is the market, manufacturing and technical leader in wire and synthetic rope manufacturing, providing a consultative approach to offer customers a single, reliable source for solutions that fit their specific application and budget needs. WireCo markets value-added products under several brands that are recognized throughout the world and used in a wide range of market applications.

WireCo is headquartered in Prairie Village, Kansas, USA with manufacturing plants, distribution facilities and research and development centers worldwide. WireCo has manufacturing and sales locations in North America, South America, Europe, and Asia, with approximately 3,400 global employees supporting these efforts. The Company does not have any entities or physical operations in Canada, but it does have some customers and limited sales in Canada. In 2023, sales into Canada were approximately 1% of WireCo's total revenue.

WireCo acquires raw materials, goods and equipment ranging from, but not limited to, high carbon steel rod, lubricants, polymers, maintenance and repair supplies, personal protective equipment and material handling equipment. The majority of our suppliers are in countries with high standards of protection for employees and the rights of individuals, and do not pose a high degree of risk of forced labour or child labour practices. We acquire goods, equipment, and services from reputable, well-known suppliers who also primarily operate in countries with proportional protections for employees and other individuals. Our primary suppliers are located in the United States, Mexico, Germany, Portugal, Poland and the Netherlands, and the majority of our suppliers have been doing business with the Company for more than 20 years.

### Policies, Procedures and Due Diligence

The Company has policies and procedures in place to ensure that our business is conducted in a legal and ethical manner. These policies include our Code of Business Conduct and Ethics ("the Code of Conduct") and Supplier Code of Conduct to ensure ethical business practices and compliance with applicable law by our employees, suppliers and other business partners.

The Code of Conduct and Supplier Code of Conduct include requirements for fair employment practices and respect for human rights, including the Universal Declaration of Human Rights of the United Nations and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the UN International Labor Organization (ILO). The Supplier Code of Conduct also sets out the Company's expectations with respect to compliance with applicable laws, business ethics, environmental impact, conflict minerals, health and safety and human rights.



Our employees receive annual training on the Code of Conduct, and we maintain a confidential and anonymous reporting hotline that allows employees and others to raise concerns anonymously, free of discrimination, retaliation, or harassment. The Company encourages the reporting of any complaints or concerns, including those relating to compliance with the Company's policies (including the Code of Conduct), human rights issues and any unethical business conduct. Our Purchase Order Terms and Conditions require compliance with our Supplier Code of Conduct. These documents allow us to terminate our relationship in the event of a breach by the supplier.

WireCo seeks ways to mitigate the risk of forced labour or child labour practices in our supply chain. We have implemented certain preventive measures to prevent the exploitation of vulnerable individuals in the global supply chain. Screening is an important step in the supply chain due diligence process. The Company utilizes online software to conduct screening against various restricted party lists, embargoes, sanctions, or other alerts. Screening is conducted before a third party supplier is officially engaged to provide products or services to the Company. Screening of the Company's key suppliers is conducted on a regular basis in order to confirm their status and identify any potential issues.

Our key suppliers are required to complete a supplier due diligence questionnaire in order to continue to conduct business with the Company, on an annual basis. The Company conducts a risk assessment to determine which suppliers must complete a questionnaire. The risk assessment includes: the product or service supplied to the Company; the volume of business; the industry sector and jurisdiction of the third party; the nature of the relationship; and the third party's relationship, if any, with government entities. When evaluating risk, locations of suppliers residing within specific countries are taken into account in accordance with the Corruption Perception Index. The Company will review and evaluate the questionnaire responses for any potential supplier issues, and address any issues as appropriate. As part of the supply chain due diligence questionnaire process, each such supplier is required to certify that they will comply with all applicable laws and the Company's policies pertaining to the supply chain.

WireCo visits key raw material vendors at least annually with higher volume suppliers visited more frequently. The visits entail overall spend review, manufacturing process change review and updates on general market conditions, emerging trends and compliance overviews.

### Supply Chain Risks

WireCo has assessed both its operations and its supply chain and, taking into account our policies, procedures and diligence in place, we consider the risk of forced labour or child labour in our supply chain to be low. We have implemented the policies, procedures and due diligence processes described above to manage and mitigate this risk.

### Remediation Measures

The Company has not identified any instances of forced labour or child labour in our activities or supply chain; therefore, there are no remediation measures to be implemented at this time based on our current operations and supply chain. As a result, we have determined that vulnerable families have not incurred any income losses due to forced labour or child labour risks in our supply chain.

### Training

The Company provides annual training to its employees with respect to the Code of Conduct. We utilize an online platform to deliver this training to all professional employees, which is required to be completed upon employment and annually thereafter.

### Assessment of Effectiveness

WireCo understands that preventing the use of forced and child labour in our supply chain requires an ongoing commitment of time, resources, and awareness among all of our stakeholders. The Company will continue to assess the risk of forced and child labour in conjunction with its enterprise risk management program, and our Procurement Team will take an active risk-based approach, considering the country of origin, when assessing and onboarding new suppliers. In order to maintain the Company's supply chain due diligence program and ensure consistent adherence to applicable laws, the Company's Chief Compliance Officer may conduct or authorize a review and audit of all aspects of the Company's supply chain due diligence program in order to identify non-compliance with the Company's policies and procedures, deficiencies in training or procedures, and potential violations for corrective action.

### 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. This report has been approved by the Board of Directors of WireCo WorldGroup Inc.



Daniel Vinton  
Director and Chief Financial Officer  
May 16, 2024

I have the authority to bind WireCo WorldGroup Inc.