



**Report submitted on behalf Worthington Steel, Inc. under the Fighting Against Forced Labour  
and Child Labour in Supply Chains Act  
May 30, 2024**

**Reporting Entity's Legal Name:** Worthington Steel, Inc.  
**Business Number:** USA EIN: 92-2632000  
**Other jurisdictions with applicable reporting requirements:** California  
**Entity categorization according to the Act:** Manufacturing  
**Sector/ Industry:** Manufacturing/Steel/Automotive  
**Location:** Worthington Steel, Inc. 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 Worthington Steel, Inc. (referred to as the "Entity" or "Worthington Steel"), a metals processor that partners with customers to deliver highly technical and customized solutions. Worthington's expertise in carbon flat-roll steel processing, electronical steel laminations and tailor welded solutions are driving steel toward a more sustainable future.

Worthington Steel 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**

Headquartered in Columbus, Ohio, Worthington Steel is North America's premier value-added steel processor and producer of market leading consumer and building products. It partners with customers to deliver highly technical and customized solutions. Worthington Steel's expertise in carbon flat-roll steel processing, electronical steel laminations and tailor welded solutions are driving steel toward a more sustainable future.

Worthington Steel operates 52 facilities in 15 states and nine countries, sells into over 90 countries and employs approximately 9,500 people. This report covers three of our subsidiaries that have revenue in Canada, The Worthington Steel, Company, The Worthington Steel Company, LLC and Worthington Steel Rome, LLC. Two of our other subsidiaries, Tempel Steel and TWB Co., LLC, are also covered under the Fighting Against Forced Labour and Child Labour in Supply Chains Act and are filing separate reports. <sup>1</sup>

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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 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

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In 2023, Worthington Steel imported steel from Canada and Germany, with the balance being purchased directly in the United States. Its supply chains do not have any connection to China. Thus, Worthington's risk of exposure to forced labour or child labour is very limited.

Worthington Steel's Supplier Codes 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 labor in the conduct of our business operations or in our supply chains.

In particular, its Supplier Code of Conduct specifies that "suppliers shall not use any form of child labor within their organization or purchase materials or services from companies using underage labor." It also requires that "suppliers shall not use any form of forced, involuntary or slave labor within their organization or purchase materials or services from companies using forced, involuntary, or slave labor."

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, 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, Worthington Steel's Code of Conduct has a zero tolerance for any form of human trafficking or forced, involuntary, slave or child labor in the conduct of its business operations or in its supply chains.

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

Worthington Steel 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.

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

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owned by BaoSteel (Chinese company), Neither TWB's nor Worthington's supply chains have any connection to Chinese supply chains.

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Worthington Steel 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

Worthington Steel does not provide training. Its Supplier Codes 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

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

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

Worthington Steel

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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 Tempel Canada Co. 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.

I have authority to bind Worthington Steel, Inc.



- Joseph Heuer
- Vice President, General Counsel and Secretary
- 5/30/2024