

thyssenkrupp Materials Trading CA, Ltd.

Report on Measures to Prevent and Reduce the Risk of Forced and Child Labour in Supply Chains

I. INTRODUCTION

This is the first report of thyssenkrupp Materials Trading CA, Ltd. ("**tk Trading**") under Canada's *Fighting Against Force Labour and Child Labour in Supply Chains Act* (the "**Act**").

As members of the thyssenkrupp group of companies, tk Trading shares thyssenkrupp's values and is bound by thyssenkrupp's policies and standards as they related to human rights, including forced and child labour. This report sets out the information required by Act and affirms our plans to implement and further develop appropriate measures to combat forced and child labour in our supply chains.

II. STRUCTURE, ACTIVITIES AND SUPPLY CHAIN

tk Trading is a corporation incorporated under the Ontario Business Corporations Act under OCN 1000299877. Its Business Number is 70472 5605 and its financial reporting year is October 1 to September 30. tk Trading, headquartered in Concord, Ontario, is a wholly-owned subsidiary of thyssenkrupp Materials CA, Ltd. // thyssenkrupp Matériaux CA, Ltée.

The tk Trading procurement function operates within the broader thyssenkrupp group procurement function. As the thyssenkrupp group and tk Trading specifically are committed to highest standards regarding sustainability and compliance, we place utmost importance on responsible procurement practices.

Our procurement teams are working closely together with their internal partners across multiple functions; applying state-of-the-art procurement methods and tools; and continuing on the journey towards digital procurement processes. All this is driven by the individual companies within thyssenkrupp, in line with their specific business and market requirements. The Procurement & Supply Management service lines provide professional support and create synergy effects from pooling spend and expertise across thyssenkrupp.

More specifically, however, tk Trading imports carbon steel products from different countries for direct sale to Canadian customers. All orders are back to back, meaning we match the commitment to the supplier with a commitment from a customer or group of customers. From our base near Toronto, we service the entire Canadian market with regular deliveries to locations in Quebec, Ontario, British Columbia and elsewhere. Our customers include both steel distributors and end users.

III. POLICIES AND PROCEDURES IN RELATION TO FORCED AND CHILD LABOUR

Like every other company in the thyssenkrupp group, tk Trading is bound by and adheres to thyssenkrupp group policies, standards and commitments on sustainability, the environment social responsibility and governance, including as they relate to human rights and modern slavery. thyssenkrupp is committed to the highest sustainability standards, which include environmental and social responsibility as well as good corporate governance. As stated on the thyssenkrupp AG web site at <https://www.thyssenkrupp.com/en/company/sustainability/social-responsibility/human-rights>:

The main principles and rules of our actions and the standards we set ourselves in our dealings with business partners and stakeholders are summarized in the thyssenkrupp Code of Conduct. This forms the principal framework for the Executive Board as well as for all thyssenkrupp leaders and employees. The thyssenkrupp Code of Conduct contains all the fundamental principles and rules for responsible and ethical behavior towards people inside and outside the company. We base our actions on these. We also work to ensure that our direct suppliers respect human rights and are committed to ensuring that this is also the case for indirect suppliers.

The thyssenkrupp [Code of Conduct](#) sets out the key principles and basic rules for the company's actions and its behavior toward business partners and the public. It provides employees, managers and the Executive Board alike with a framework for orientation.

In addition to the Code of Conduct, tk Trading is bound to adhere to the following:

thyssenkrupp Supplier Code of Conduct: thyssenkrupp's [Supplier Code of Conduct](#) clearly formulates the company's expectations of suppliers. The Supplier Code of Conduct is based on the principles of the United Nations Global Compact and the United Nations Universal Declaration of Human Rights. Our aim is to work only with suppliers who adhere to the principles set out in the code and comply with national laws in this context.

thyssenkrupp Modern Slavery Statement: thyssenkrupp aims to eliminate slavery and human trafficking both in its supply chain and in its own operations. Our efforts in this regard are described in the "[thyssenkrupp Modern Slavery Statement 2022/2023](#)", which was drawn up in accordance with the requirements of the *United Kingdom Modern Slavery Act (2015)*, the *Australian Modern Slavery Act (2018)* and Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act (2024)*. The thyssenkrupp Modern Slavery Statement (which is incorporated by reference in this report) affirms the group's commitment to:

- the United Nations International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights);
- the core labor standards promulgated by the International Labour Organization's (ILO);
- the principles of the United Nations Global Compact;
- compliance with all applicable laws, statutory provisions and standards in countries where we operate or are based;
- compliance with relevant human rights and environmental obligations; and
- the implementation of these frameworks throughout the whole group.

Principles of compliance with human rights and environmental due diligence requirements: We at thyssenkrupp have developed a Group-wide concept and a corresponding organizational structure to create a sustainable culture for compliance with human rights and environmental due diligence obligations. In addition to the individual standards and regulations listed above, our concept is also outlined in our [Principles of compliance with human rights and environmental due diligence requirements](#).

IV. RISK ASSESSMENT, MANAGEMENT AND MITIGATION

The group-wide and local human rights compliance measures described above ensures that the tk Trading operates with as little risk as possible of forced or child labour in our supply chains. However, we acknowledge that there is some risk of forced and child labour in the supply chains of the products we purchase and we are committed to continuously enhancing our efforts and measures to manage and mitigate this risk.

The forced and child labour risk assessment, management and mitigation measures that we adopt at a group-wide level (and that apply to tk Trading) are described in detail in the thyssenkrupp Modern Slavery Statement, starting at page 4. We continuously seek to improve our risk management processes, including in the area of forced labor and child labor risks in the supply chain.

V. EFFECTIVENESS OF OUR ACTION

The measures we adopt to measure the effectiveness of our actions are described in detail in the thyssenkrupp Modern Slavery Statement, at page 10. These measures, which apply to tk Trading, include an annual update of the Modern Slavery Statement that involves a feedback process between relevant thyssenkrupp group functions, engagement with industry groups and peers to ensure any new requirements or practices are implemented, and integration of our sustainability reporting within our annual report. In addition, thyssenkrupp reviews its due diligence and

monitoring approaches (as described in the “Focus on our own operations” part of the Statement). As noted in our 2022/ 2023 Modern Slavery Statement, throughout 2023/2024 we launched our ESG strategy which aims to further develop our sustainability strategy as described in the “Next milestones and future points of action” part of the Statement.

VI. REMEDIATION MEASURES

tk Trading has not identified any incidents of forced or child labour in our supply chains. As such, we have taken no related remediation measures. In the unlikely event an incident should arise, we are committed to working with our suppliers to implement appropriate remediation measures as described in the “Focus on our operations” part of the thyssenkrupp Modern Slavery Statement.

VII. TRAINING

Training on our policies and other measures to fight forced and child labour is an integral part of the thyssenkrupp group’s approach to risk management. As detailed in the thyssenkrupp Modern Slavery Statement (including at page 5), relevant employees responsible for risk management are receiving training on human rights related topics, including compliance with the German Act on Corporate Due Diligence Obligations in Supply Chains.


Our prevention measures include, for example, the acknowledgment of the thyssenkrupp Supplier Code of Conduct.

thyssenkrupp’s training and communications efforts as they relate specifically to modern slavery are detailed in thyssenkrupp’s Modern Slavery Statement at page 8.

APPROVAL & ATTESTATION

In accordance with the requirements of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for thyssenkrupp Materials Trading CA, Ltd. I attest that the report has been approved by the board of directors of thyssenkrupp Materials Trading CA, Ltd. and that, based on my knowledge and having exercised reasonable diligence, 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.

Pursuant to the Unanimous Written Consent in Lieu of a Special Meeting of the Board of Directors of thyssenkrupp Materials Trading CA, Ltd. dated May 13, 2024, I have the authority to bind thyssenkrupp Materials Trading CA, Ltd.

Signature:	
------------	---

Name: Paul Cottrell

Title: Member of the Board of Directors

Date: May 14, 2024