

This report (“**Report**”) is made in compliance with Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “**Act**”) by voestalpine Rotec North America Corp., (“**vRNAC**”), an Ontario company and, a subsidiary of voestalpine AG. (“**voestalpine**”).

vRNAC, a Canadian entity operating in Burlington, Ontario in the manufacturing and wholesale trade industry, has prepared this report for the fiscal year ending March 31, 2023.

## Structure, activities and supply chains

voestalpine Rotec North America Corp. is a Canadian operation of voestalpine AG, a leading steel and technology group, based in Linz Austria, voestalpine is a globally leading steel and technology group with a unique combination of materials and processing expertise. voestalpine, which operates globally, has around 500 Group companies and locations in more than 50 countries on all five continents. It has been listed on the Vienna Stock Exchange since 1995.<sup>1</sup>

The supply chain of vRNAC is primarily comprised of tubular steel, produced and supplied by various steel mills in North America, Europe and Asia.

## Policies and due diligence processes

Operating on a global scale obliges us to pay particular attention to the fundamental rules of human interaction. Respect for human rights is a precept that governs the actions of all our companies. Since 2013, voestalpine has supported the UN Global Compact (UNGC) whose ten principles stipulate fundamental duties with respect to human rights, work, the environment, and the fight against corruption. In March 2023, the Management Board of voestalpine adopted the Group’s new [Human Rights Policy](#). Among others, it states unequivocally that voestalpine does not tolerate child labor, forced labor, human trafficking, or modern slavery—neither within the Group, nor in its supply chain. Over and above the foregoing, we are committed as well to diversity and equal opportunity and do not tolerate any discrimination whatsoever.<sup>2</sup>

The Management Board of voestalpine AG adopted an updated [Code of Conduct for Business Partners](#) at the close of the business year 2022/23. This Code defines voestalpine’s principles and requirements. It is designed to ensure that business partners’ practices conform to both voestalpine’s values and as applicable laws and regulations. The principles and requirements are rooted in the Human Rights Policy and the voestalpine Code of Conduct as well as in the UN Guiding Principles (UNGPs) on Business and Human Rights; the principles enshrined in the UN Global Compact (UNGC); the International Bill of Human Rights; and the United Nations Convention against Corruption.<sup>3</sup>

## Parts of business at risk of forced labour or child labor

As a Sales partner to Automotive Tier 1 and 2, we have a very high level of transparency in our supply chain, and are bound by the voestalpine Code of Conduct, Supply Chain Transparency requirements and Human

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<sup>1</sup> [AG](#) and [vRNAC](#) public sites

<sup>2</sup> [2023 CRR](#) pg.6

<sup>3</sup> [2023 CRR](#) pg.52

Rights Policy. Risks in our supply chain may arise when sourcing from external producers where visibility into our suppliers' upstream supply chains is limited.

## Actions

A questionnaire that asks suppliers to provide information about themselves—the “Supplier Assessment Questionnaire – (SAQ)” —was developed [by voestalpine]. Besides questions about general corporate information, it especially contains detailed questions on various sustainability issues, such as human rights, occupational safety, environmental policies, and compliance. The SAQ, which so far has been used chiefly [by voestalpine steel mills] in connection with raw materials purchases, is gradually being rolled out to general merchandise procurement categories also. It is evaluated on a regular basis and adjusted to changing parameters, such as supply chain legislation.<sup>4</sup> The voestalpine SAQ will be implemented for external suppliers in fiscal year 2024/25, with the goal of increasing supply chain transparency and further reducing the risks relating to Forced Labour and Child Labour.

The Code of Conduct for voestalpine Business Partners defines the principles and requirements imposed on voestalpine business partners. voestalpine demands that all business partners provide safe and healthy working conditions for all the business partner's employees or those employees working under their supervision. This includes the provision of personal protective equipment. In all cases, the business partners must comply with the occupational health and safety obligations applicable under the law of the place of employment.<sup>5</sup>

## Remediation measures

Reports of human rights violations can always be submitted in person to direct managers, the local HR departments, Group Human Resources at voestalpine AG, as well as to the Management Board. Violations can also be reported to a Human Rights Officer (see below) or via voestalpine's online whistleblower system at <https://www.bkms-system.net/voestalpine>. The online whistleblower system allows reports to be submitted anonymously.<sup>6</sup>

## Training

voestalpine AG developed an online training program in collaboration with renowned experts to ensure that human rights are respected and upheld within the Group. It is designed to sensitize all our employees to their heightened responsibility for observing human rights and gives them important information as well as instructions on how to act. This training provides a general introduction to and an explanation of the concept of “human rights”, describes human rights in our day-to-day work—especially working conditions and non-discrimination—and addresses human rights in the supply chain.<sup>7</sup>

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<sup>4</sup> [2023 CRR](#) pg.49

<sup>5</sup> [CoCBP](#) pg.4

<sup>6</sup> [HR Policy](#) pg.4

<sup>7</sup> [HR Policy](#) pg.2

Assessment

The voestalpine group is developing internal accountability standards and procedures to address employees, contractors or suppliers who fail to meet company standards regarding slavery and human trafficking.

Credible information regarding a potential violation of the [voestalpine Human Rights Policy], whether discovered by employees, or business partners and their employees and agents, should be promptly reported to the local HR departments, Group Human Resources at voestalpine AG, or via voestalpine's online whistleblower system at <https://www.bkms-system.net/voestalpine>. The online whistleblower system allows reports to be submitted anonymously.<sup>8</sup>

Approval / 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 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. I have the authority to bind voestalpine Rotec North America Corp.



John T. Williams  
VP & CFO  
voestalpine Rotec North America  
May 28, 2024

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<sup>8</sup> [HR Policy](#) pg.4