

**Fighting Against Forced Labour and Child Labour in Supply Chains Act**  
**EVRAZ Inc. NA Canada**  
**Annual Report for the Financial Year Ending 31 December 2024**

## **INTRODUCTION**

This Annual Report is prepared pursuant to EVRAZ Inc. NA Canada's ("EICA") reporting obligations under Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") for the calendar year 2024 in accordance with sections 9 and 11(2) of the *Act* for the financial reporting year ended December 31, 2024.

This report sets out the steps EICA has taken in the 2024 financial year to prevent and mitigate the risk that forced labour or child labour was used in the production of goods in Canada and in our supply chain, and further sets out our plans for further enhancements in the coming years.

## **EICA's CORPORATE STRUCTURE, ACTIVITIES & SUPPLY CHAINS**

### Our Structure

EICA is incorporated pursuant to the *Canada Business Corporations Act*, and bears corporation number 1181707-8. EICA employs 1,660 employees in Canada.

EICA together with EVRAZ Inc. NA ("EINA")—which is incorporated pursuant to the laws of Delaware and bears corporate number 782834—are operated and managed as "EVRAZ North America", which is headquartered in Chicago, Illinois, and are operated independently of other Evraz companies located outside of North America.

EICA is owned by EVRAZ North America Plc ("**ENA**") and EVRAZ Group S.A. ("**EGSA**"), a Luxembourg company. ENA and EGSA are wholly owned by EVRAZ plc, a public company incorporated under UK laws.

### Our Activities

Our operations in Canada consist of the production of various steel goods, namely intermediate products like hot-rolled coil and plate and finished products like oil country tubular goods and line pipe. These goods are sold to customers in the Canadian and U.S. markets.

### Our Supply Chains

The primary raw material sourced to produce steel products in Canada is scrap metal. EICA's supply chains consist of unaffiliated and affiliated entities located in Canada and the United States that supply EICA with scrap metal used in the production of our Canadian steel products. Given the dynamics of the global steel trade, scrap metal is generally sourced locally, with all our scrap metal being sourced in Canada and the United States. Given the labour laws in the United States and Canada and our close working relationship with our North American partners, we judge that there is little to no risk of forced labour or child labour in EICA scrap metal supply chains. In addition to scrap metal, EICA procures a variety of

metal alloys, electrodes, and other products necessary to produce our steel products. We also judge that there is little to no risk of forced labour or child labour in the supply chains used to procure these materials. Nevertheless, and as discussed below, we have proactively implemented a series of policies and programs to monitor our supply chains and mitigate the risk, if any.

The year 2024 saw no significant changes in EICA's supply chains in terms of the location of our suppliers or their identity.

## **STEPS TAKEN BY EICA IN 2024 TO PREVENT OR REDUCE THE RISK OF FORCED LABOUR OR CHILD LABOUR IN OUR SUPPLY CHAINS**

EICA does not tolerate any form of slavery, servitude, forced or compulsory labour, child labour, human trafficking or other forms of slavery, and these are strictly prohibited.

We are committed to preventing the occurrence of modern slavery, forced labour, child labour, and human trafficking in our supply chain, regardless of the location in which they occur.

We take the process of contracting with supply chain partners seriously. We require our partners and suppliers to respond to detailed questionnaires regarding their business practices and conduct third party assessments to carefully vet and monitor our partners and suppliers to ensure they respect human rights and abide by the ethical standards required to conduct business with EICA. Our contracts with partners and suppliers include sections that require our partners and suppliers to certify their compliance with all applicable laws, including laws governing the prevention of corruption, forced labour, and human trafficking.

We conduct risk assessments with our suppliers and subcontractors. Should a potential risk in relation to forced labour or child labour become apparent, it would become part of the risk management process, and would be addressed through our existing protocols in this regard. EICA's commitments are based on the laws of Canada and the United States prohibiting child labor, slavery and forced labour, as well as international standards and best practices. We adhere to the principles of the UN Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the Organization for Economic Co-operation and Development's Guidelines for Multinational Enterprises in all our activities.

## **POLICIES AND DUE DILIGENCE PROCESSES RELATED TO FORCED LABOUR AND CHILD LABOUR**

The EVRAZ North America Code of Business Conduct and our Supplier Code of Conduct establish the standards of ethics, integrity and respect for individuals required in EICA's business and across our supply chain. The use of child or forced labour by EICA or any of our suppliers is prohibited under these policies. Copies of these policies are available on the EICA intranet.

The ethical norms and rules dictated by these policies apply to all EVRAZ North America entities and all business unit levels, including EICA. Compliance managers situated across our business units are responsible for monitoring labour relations, for vetting existing and

prospective partners and suppliers, for managing and resolving conflicts of interest, and for supervising labour conditions.

EVRAZ North America's Internal Audit, Compliance, and Legal Departments are responsible for assessing areas of risk, developing compliance programs to address such risks, implementing and coordinating in-house compliance training, maintaining a risk register, and keeping the Board of Directors apprised of our compliance progress.

Besides the above policies and regulations, we take the process of contracting with partners seriously and monitor our partners to ensure they respect human rights and business ethics standards. All our contracts with third parties include sections requiring compliance with applicable laws and regulations. These provisions oblige the counterparty to comply, and to ensure compliance by subcontractors, with all applicable laws and regulations, including related to forced labour and child labour.

### **RISK ASSESSMENT OF EICA'S SUPPLY CHAINS**

EICA recognizes that identifying the risk of forced labour or child labour in its supply chain is the first step to addressing such risk. As noted earlier in this report, based on the close working relationships with our suppliers, the nature of the materials (primarily scrap metal) that EICA procures for the production of steel products in Canada, and the locations from which we procure such products (entirely from within North America), EICA does not believe that our supply chains are exposed to much if any risk of forced labour or child labour. We are committed to monitoring, evaluating, and addressing any forced labour or child labour risks that may arise during our procurement activities.

### **REMEDIAL MEASURES TAKEN IN 2024 IN RELATION TO FORCED LABOUR OR CHILD LABOUR OR TO REMEDIATE THE LOSS OF INCOME TO VULNERABLE FAMILIES**

During the 2024 fiscal year, EICA did not identify any use of forced labour or child labour in our supply chains. EICA has therefore not taken any steps to remediate the use of forced labour or child labour. EICA has also not taken any measures to remediate loss of income to vulnerable families because we do not believe there has been any such loss related to our supply chain activities.

### **MITIGATING FORCED LABOUR RISK IN OUR RECRUITMENT PRACTICES**

EICA pays particular attention to identifying and addressing human rights risks, including those related to recruitment and working conditions. We embrace the principle of equal opportunity in our hiring practices and prohibit all forms of discrimination. Employee recruitment is conducted in full compliance with applicable laws, including relevant regulations governing labour protection, wage and hour regulations, annual paid and parental leave, collective bargaining agreements, health insurance, pensions and personal data protection.

In this regard, during the reporting period, EICA focused on the equity of our compensation practices, improving our employee recruitment processes, and utilizing automated processes to ensure pay equity and legal compliance.

## **TRAINING AND AWARENESS**

As a part of our onboarding process, every EICA employee is required to complete our training on labour protection as outlined in the Business Conduct policy. This training covers such topics as employee rights and diversity, compliance with all applicable laws, conflicts of interest, and other ethical issues. Each new employee is also required to complete our training on Modern Slavery and Human Trafficking, aimed at training employees to recognize the warning signs and taking action to prevent these crimes in the workplace and supply chain. In addition, current staff members complete a refresher of each course on an annual and ongoing basis.

The training provided consists of 2.5 hours of online coursework administered via a 3<sup>rd</sup> party Risk & Compliance management system. It includes external legal and compliance content in addition to our internal policy review. Each employee completes an assessment at the end to ensure knowledge transfer.

In 2024, 497 EICA and EINA employees in the United States and Canada, working in Leadership, Supply Chain and HR roles, were required to familiarize themselves with the Business Conduct policy and Modern Slavery and Human Trafficking training, with an 85% completion rate.

All new employees are informed of the EVRAZ North America Ethics Hotline for the reporting of employment concerns.

Every meeting with more than 15 participants begins with a “safety moment”, where the speaker discusses our safety rules and reminds employees to adhere to safe and equitable labour practices.

## **ONGOING MONITORING AND ASSESSMENT EFFECTIVENESS IN MITIGATING RISKS OF FORCED LABOUR AND CHILD LABOUR IN OUR SUPPLY CHAINS**

There are several functional teams within EICA and EVRAZ North America that are responsible for ensuring our compliance with all laws and regulations and assessing the effectiveness of that compliance, including those designed to prevent forced labour and child labour, as well for ensuring transparency in our business processes. These include the Legal, Compliance, HR and Internal Audit teams, all of which monitor compliance with our processes and continuously review, assess, and update our policies to reflect international best practices.

Our compliance managers are responsible for monitoring compliance with EVRAZ North America policies and practices, vetting prospective partners and suppliers, checking on existing partners and suppliers, and managing and resolving conflicts of interest.

## **MITIGATING FORCED LABOUR RISK THROUGH REPORTING**

EICA encourages employees and stakeholders to adhere to the principle of transparency and to report cases of misconduct or issues that they find concerning or suspicious, using the EVRAZ North America 24/7 Ethics Hotline which provides anonymity to any caller. We operate the Hotline to encourage the reporting of any employment or ethical concerns involving our employees, vendors or contractors.

Incoming reports are registered in the IT system and then assigned by the General Counsel to the appropriate department (e.g. HR, HSE, Security), depending on the subject of the complaint. The relevant experts then analyze the report and take specific measures to resolve the issue. If the report is not anonymous and the person has provided contact details, we inform them about the status of the report as well as any relevant measures taken. All complex, controversial, or sensitive issues are handled by the Hotline Team (for the EINA whistleblowing hotline), which include senior executives. This structure provides confidence that all appropriate measures will be taken to address any reports. Year by year confidence in the whistleblowing hotline is growing among our employees, partners, and contractors. In 2024, 13 reports were submitted via the EVRAZ North America Hotline. During the reporting period, zero cases of child or forced labour were reported in EICA operations or supply chains. During the reporting period, zero cases of child or forced labour were reported in EICA operations or supply chains.

## **OUR PLANS FOR THE FUTURE**

EICA will continue to focus on improving our policies, practices and training programs and to identify and address forced labour and child labour risks with any of our partners and suppliers across our supply chains.

## **APPROVAL AND ATTESTATION**

This Annual Report has been made pursuant to section 11(1) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and constitutes EICA's Annual Report for the financial year ending 31 December 2024.

This statement was approved by the Board of EICA on May 21, 2025.

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.



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James Herald  
President and Chief Executive Officer  
EVRAZ Inc. NA Canada  
May 22, 2025