



Bill S-211 Compliance Report

May 2025

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Manager – H.C. Starck Canada Inc

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1) Rationale

Effective January 1, 2024, entities must, on or before May 31 of each year, submit a report to the Minister of Public Safety on:

- The steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity
- Its structure, activities and supply chains
- Its policies and due diligence processes in relation to forced labor and child labor
- The parts of its business and supply chains that carry a risk of forced labor or child labor being used and the steps it has taken to assess and manage that risk
- Any measures taken to remediate any forced labor or child labor
- Any 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 labor or child labor in its activities and supply chains
- The training provided to employees on forced labor and child labor
- How the entity assesses its effectiveness in ensuring that forced labor and child labor are not being used in its business and supply chains

2) Structure, Activities and Supply Chains

This report is applicable to H.C. Starck Canada Inc's operations in Canada for the financial reporting year Jan 1, 2024 to Dec 31, 2024. H.C. Starck's Inc. is a legal corporation located at 933 Vidal St. South, Sarnia Ontario, Canada, operating under Canadian Revenue Agency tax roll #854947520.

During the reporting period, H.C. Starck Canada was a wholly owned subsidiary of H.C. Starck Tungsten GmbH who was owned by Masan High Tech Materials, located in Vietnam. There are production facilities in Germany, Vietnam and China. H.C. Starck Canada's reporting structure is such that Sarnia site employee's report to Ryan Bender who serves as Site Manager and is a member of the board of directors of H.C. Starck Canada Ltd. Ryan Bender reported to the CEO in Germany who then reported to the CEO of Masan High Tech in Vietnam.

H.C. Starck Canada, a wholly owned subsidiary of H.C. Starck Tungsten GmbH, is now owned by Mitsubishi Materials Corporation as of January 1, 2025. H.C. Starck Germany now reports to the CEO of Mitsubishi Materials Europe Corporation.

H.C. Starck Canada currently produces material under NAICS code 325189 for basic chemical manufacturing, producing tungsten metal powder, tungsten carbide and cast tungsten carbide. Current H.C. Starck Canada has approximately 48 employees which comprises both hourly and salary workers. All employees of H.C. Starck Canada are physically located in the province of Ontario, Canada.

H.C. Starck Canada produces material in Canada using raw material imported from the USA, EU & Vietnam. This raw material is current imported into Canada using HS code: 8101.94.00

We export our products globally with primary exports to USA, Japan and the EU in quantity of 800-1200 tons per year. Our products being exported are classified under one of the following HS codes:

- a. Tungsten Carbide – 2849.90.30
- b. Tungsten Carbide Doped – 3824.30.00
- c. Tungsten Metal Powder – 8101.10.00

3) Policies and Due Diligence Processes

H.C. Starck Canada currently has a due diligence process in place to identify and mitigate the risk of adverse/unfair labor practices in our supply chain. This is an alignment with our companies broader Responsible Business Conduct (RBC) strategy and is part of our Environment, Social & Governance (ESG) initiatives. This process is revisited on an annual basis and serves as the basis for our supplier risk evaluation.

Number	Description	Attachment Name	Revision	Dated
1	Corporate Code of Conduct	Code of Conduct Version NAFTA	-	26-Jul-21
2	Corporate Compliance Policy	Compliance Version HCS SAR	-	26-Apr-21
3	Corporate Commitment to responsibility and sustainability	Corporate Policy Version HCS SAR		26-Apr-21
4	Supplier Code of Conduct	Supplier Code of Conduct_en	1	11/1/2023
5	Supplier AuditSelf-Audit Questionnaire	Supplier AuditSelf-Audit Questionnaire (1)	-	-
6	Source List for Conflict Affected & High Risk Area's	Resources for CAHRAs and due diligence analysis	7.1	20-May-24

4) Supply Chain Mapping/Risk Identification

Please see completed Supply Chain Mapping/Risk Identification Summary, attached hereto as

Number	Description	Attachment Name	Revision	Dated
7	Supply Chain Mapping/Risk Identification	Risk Assessment - Sarnia - 2024	-	13-May-25

This analysis is structured in following format

- a. Own Business Area Risk Analysis
- b. Direct Suppliers Summary – raw material & additive inputs
- c. Direct Suppliers Detailed Risk Analysis
- d. Indirect Suppliers Detailed Risk Analysis
- e. Indirect Suppliers Action Plan

5) Remediation Measures & Loss of Income

Through effective risk identification using supply chain risk mapping. There were no current direct or indirect suppliers who are currently non-compliant with the requirements of Bill S-211. One supplier was identified for further examination and was found to comply. This supplier was identified through the supply chain risk exercise as their product is produced in China and trans-shipped via Germany. Documentation and training records were submitted by the supplier, reviewed by H.C. Starck and found to comply. Excerpt from risk mapping below...

Indirect Supplier - Risk Analysis 2024 Action Plans						
For each supplier with combined score <10						
Type	Supplier	Supplier #	Location	Country Risk 1-5 (1 low, 5 high)	Impact/Severity 1-5 (1 low, 5 high)	Risk Score >20 = action plan needed
Graphite Parts	Henschke GmbH	54270	EU	4	5	20
Summary: Henschke poses a significant risk as parts made in China, sent to Germany and then shipped to Canada. Henschke doesn't have control over the day-to-day operations of the China facility.						
Actions: Audit process/procedure & training records for China factory to ensure process & procedure is up to current labour standards, all employees are trained on these procedures and periodic audits are conducted to ensure compliance.						
Results: Documentation submitted and reviewed in detail which showed Henschke & their Chinese contract manufacturer to be in compliance with generally accepted labour standard & practises.						
Recommendations: Corporate/Group on site audit on Chinese contract manufacturer in future						

As all suppliers are currently compliant with the requirements in Bill S-211 there is no additional remediation action at this time and there is no expected loss of income from continued compliance to this legislation.

6) Training

H.C. Starck Canada has a robust training program for all employees which is software based using a solution provided by Traccess CI. This system allows management of standard training as well as job specific requirements, providing proactive reports to ensure continued training compliance.

All Employees of H.C. Starck Canada are trained on the following topics, separated into Corporate and Site/Country specific trainings. Currently trainings are mandatory for all employees. Re-training is based on a 5 year cycle.

H.C. Starck Group Level Training

- 1) H.C. Starck Code of Conduct
- 2) Masan High Tech Code of Conduct
- 3) Health, Safety Environment & Quality Corporate Principles
- 4) H.C. Starck Corporate Principles

H.C. Starck Canada – Sarnia Site

- 5) Health, Safety Environment & Quality Policy
- 6) Supply Chain Sustainability – UN SDG's, Responsible Sourcing, Fair Labor Practices, Circular Economy, Carbon Footprint Scopes 1-3

7) Assessing Effectiveness

As outlined in this report, H.C. Starck Canada feels the policies & procedures currently in place combined with effective training and periodic risk reviews ensures we are compliant with the requirements set out in Bill S-211. No further actions in addition to this report are required.

8) Attachments Summary

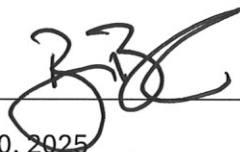
Appendices Listed For Reference – attached hereto				
Number	Description	Attachment Name	Revision	Dated
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2	Corporate Compliance Policy	Compliance Version HCS SAR	-	26-Apr-21
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7	Supply Chain Mapping/Risk Identification	Risk Assessment - Sarnia - 2024	-	13-May-25

This is the original report without modifications. This report is not submitted jointly with any other legal entity. Currently H.C. Starck Canada Inc does not have reporting obligations in other legal jurisdictions. This report, in it's entirety will be posted on our corporate website for public access.

Website Address: www.hcstarck.com

I hereby attest that, to the best of my knowledge and belief, all information in the above referenced data reported is accurate and complete.

Signature: _____



Date: May 30, 2025

Ryan Bender

Site Manager – H.C. Starck Canada Inc

Managing Direction – H.C. Starck Canada Inc



Code of conduct - the basis for our success

As a global company, Masan High Tech materials (MHT) bears a high level of responsibility to all its stakeholders including customers, employees, investors and the communities in which it conducts business.

Our Code of Conduct is guided by the internationally recognized principles for the protection of human and labor rights as expressed in the United Nations Universal Declaration of Human Rights, the ILO Core Labor Standards, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Our company respects applicable law, whether local, regional or national, everywhere in the world, and expects its employees and business partners to understand and accept the Code.

The employee agrees to take all reasonable and necessary steps to comply with the Code, the law, as well as Company policies and procedures. Employees should exercise good judgment and avoid even the appearance of improper conduct.

This document briefly summarises the key principles. For detailed information, please refer to the “Explanations on the Code of Conduct”. If you are in doubt as to whether a course of action is appropriate, get advice from your Line Manager / Supervisor, the Human Resources Manager or one of the Executive Management Team.

Craig Bradshaw
Chief Executive Officer -
MHT

Dr. Hady Seyeda
Deputy Chief Executive
Officer – MHT
Chief Executive Officer
HCS

Ryan Bender
Director - HCS Canada



1 – Fair Competition

MHT is committed without reservation to fair competition and to fair contracting practices with its business partners. Any forms of collusion, or coordination that result in the unfair advantage for one party are prohibited among competitors, as is the abuse of a dominant market position.

2 – Business and financial records

Documents, including those in electronic form, are the property of MHT and are kept secure. Personal data is treated with the utmost care and in strict confidence. MHT's financial reports are prepared in accordance with the relevant legal requirements and internationally accepted accounting practices and principles. All necessary measures to prevent money laundering are taken within MHT's sphere of influence.

3 - Compliance with International Commercial Law and Provisions on Exports

MHT complies with all international agreements, conventions and treaties, as well as national laws controlling trade and financial transactions, and consistently monitors compliance with international and national export control laws.

4 - Company assets

All employees are similarly responsible for the protection of MHT's material and immaterial assets. Particular importance is attached to the results of scientific research and technical developments, such as inventions, patents and other know-how. It is prohibited to disclose company and business secrets to third parties in any form. Third party confidential information that is within MHT's responsibility must also be protected with the same care.

5 - Conflicts of interest

MHT has a zero tolerance policy for bribery and corruption. MHT does not enter into business relationships whose existence or desired scope is dependent on the payment of bribes. At MHT, preventing corruption also means obtaining information about business partners in advance. Business decisions on behalf of MHT may not be influenced by the acceptance of advantages or the granting of benefits and privileges ("perks").

6 - Behaviour toward Government Agencies; Cooperation

The Company is committed to complying with all laws and legislation regulating its businesses. Therefore MHT is dealing with all relevant government agencies cooperatively and with an open approach. If an employee learns that a government agency, legislative body, or other authorized institution, is conducting an investigation of MHT, the legal department must be informed immediately.

7 - Environmental Protection and Safety

MHT and its employees bear responsibility for protecting people and the environment in accordance with all legal and regulatory requirements in the relevant jurisdiction, as well as international industry practice. The Health & Safety, Environment, and Quality policies are the primary guide for all employees on these matters. Safety is the top priority in all dealings involving products that pollute the environment. Additionally each and every employee shares in the responsibility for ensuring the occupational safety in his or her area.



8 – Labour and employment

MHT does not tolerate discrimination or harassment, abuse or corporal punishment in any form, whether by business partners, candidates or applicants, or employees. Furthermore, MHT has a zero-tolerance policy towards any form of forced labour, modern slavery or the most severe form of child labour.

9 – Behaviour towards Suppliers of Raw Materials

MHT is working together with partners whose stance on ethical, social and environmental policy matters is consistent with that of MHT. For this reason, all suppliers of raw materials have to prove that all applicable guidelines laws and regulations, like the OECD Due Diligence and EU regulation for conflict raw materials are complied with and that they are in possession of all of the necessary permits, authorizations and approvals. Furthermore, all parties involved in our supply chain commit to comply with our purchasing guidelines.

10 – Ensuring Compliance

MHT does not tolerate any legal violations whatsoever and consistently complies with the guidelines and rules described. Therefore compliance with this Code of Conduct, the law and Company's policies is subject to regular reviews, executed on behalf of the executive management by the supervisors.

11 – External Relations

MHT has a policy on how to deal with external stakeholders and who is authorised to communicate with them. Therefore, in all matters concerning the company, employees who do not have authorization must avoid giving the impression that they speak on behalf of the company.

12 – The Compliance Organisation and Contact Persons

Your Line Manager / Supervisor is the first point of contact for any questions you may have regarding the Code of Conduct.

If the matter concerns your supervisor him or herself, you can contact the HR department or your next higher supervisor.

The Executive Management Team performs the corporate compliance function in the MHT Group. A member of the Team is your contact person for any questions you may have regarding the Code of Conduct. Inquiries can also be made anonymously, and all reasonable efforts are made to maintain confidentiality, although MHT is, of course, obligated to initiate investigations and to comply with the law and support law enforcement.

If you have specific legal questions, particularly regarding whether certain actions are lawful, please contact the appropriate Legal Department.

MHT guarantees that no employee will be subject to discrimination, retaliation or any other adverse treatment based on the employee having made a report in good faith.

COMPLIANCE POLICY

There goes a saying “Vision without action is merely a dream. Action without vision just passes the time. Vision with action can change the world”. At Masan High-Tech Materials (MHT), our vision is to be the leading integrated supplier of high-tech advanced materials critical to global innovation. This can only happen if we operate in our business environment in a legally secure manner. Therefore we set up practical processes and policies that will help us to make our vision real.

However, we can only become the leading integrated supplier if our stakeholders and shareholders trust us. We have to earn this trust - starting with management and extending to our employees. This requires compliance.

One of the official translations of compliance is “conduct in accordance with applicable law”. At MHT we take this to mean that we comply with laws and other external requirements, as well as binding commitments that we have entered voluntarily.


This applies without exception. Illegal business and activities are therefore unacceptable to us at MHT - anywhere in the world. Compliance and integrity protect our license to operate worldwide and that's why we place a high value on responsible corporate governance. We act responsibly towards our employees, customers, suppliers, business partners, authorities and society in general.

This Compliance Policy is the basis for our actions. As requirements may differ in some cases in the various countries in which we operate, this policy is supplemented by local guidelines. One thing is particularly important to us: It is by no means just about formal compliance with legal requirements and rules. Or about avoiding possible penalties. Rather, our concern is that each and every one of us actually believes in the rules. Let's work together to successfully develop new solutions that our stakeholders and shareholders trust.

Because that's what matters.



Craig Bradshaw
Chief Executive Officer - MHT



Dr. Hady Seyeda
Deputy Chief Executive Officer – MHT

Chief Executive Officer
HCS



Ryan Bender
Director – HCS Canada



COMPLIANCE POLICY

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To be legally compliant...

- we maintain a compliance organization with the necessary resources. This also includes a system for whistleblowers in accordance with locally applicable legal requirements.
- we communicate openly, inform and train our employees, and actively involve them in maintaining legal security.
- we act in accordance with our Code of Conduct (CoC). This guideline explains the correct behavior on important issues such as competition, corruption, bribery, discrimination, financial compliance, behavior towards authorities, etc.
- we regularly identify the risks and opportunities arising in the course of our activities and derive appropriate targets and measures from the results.
- we take the needs and expectations of our external and internal stakeholders into account.
- we comply with laws and other external requirements, but also with binding commitments and standards that we have entered into voluntarily. We have systems in place to check this in order to be able to take appropriate measures to comply with the requirements.
- we purchase our raw materials with the necessary due diligence in accordance with OECD and EU requirements. Respect for human rights and the environment is already a matter of course for us today. We do not tolerate the worst forms of child labor, discrimination, modern slavery or other human rights abuses.
- we support our customers in the safe handling of our products.
- we handle our data and the data of our business partners and employees responsibly and in accordance with local legal requirements.
- we cooperate openly and trustfully with the authorities. We show zero tolerance for violations of the law.

Commitment to responsibility and sustainability - four principles of our success

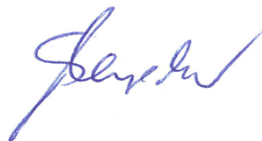
The Masan High-Tech Materials Group produces high-performance powders mainly of the refractory metal tungsten and its compounds from ore - sourced in our mine in Vietnam - recycled materials and tungsten chemicals, but also of copper, cobalt, fluorspar and bismuth and other by-products according to customer specifications. Customers benefit from the highest and most consistent quality and a comprehensive product portfolio.

We are convinced that our sustainable success is based on a multitude of different factors: Starting with the qualification of our employees, through active health and safety management, economic and ecological efficiency, energy efficiency, product and process quality, to the consideration of ethical and social aspects including the care and support for the community. These can be summarized in four principles.

As part of our integrated management system, we are therefore committed to the continual improvement of our products and manufacturing processes in terms of quality, energy-related and environmental performance, safety and health of our employees, customers and the public, and compliance with all binding legal and self-imposed requirements. The leadership and resources required for this are provided by the company accordingly.



Craig Bradshaw
Chief Executive Officer -
MHT



Dr. Hady Seyeda
Deputy Chief
Executive Officer -
MHT

Chief Executive
Officer HCS



Ryan Bender
Director - HCS Canada

Principle 1 - Occupational health and safety

We provide a safe working environment for all our employees and workers so that they will return home safe and healthy every day. In order to maintain this standard continually, we rely on consistent, transparent communication of information and specific training as well as active involvement of our employees.

We will only perform work that can be done safely. We know that all injuries, incidents, and work illnesses are preventable. On the basis that we are collectively and individually responsible for preventing injuries to ourselves and others. Therefore any kind of safety deficiencies, near misses and accidents at work are analysed in detail and regular risk assessments are carried out in order to eliminate sources of danger early and sustainably.

Occupational safety and health protection are important criteria even at the design and procurement stage of new processes and technologies.

Principle 2 - Quality awareness

We commit and develop our employees to quality and cost-conscious action. This enables us to assure our customers the expected or specified quality by using our experience and competence. Since quality is created at the source, we select our suppliers of raw materials, products and services in a targeted manner and develop them further in the sense of a long-term partnership. We continually develop the quality of our processes and products according to the Plan-Do-Check-Act (PDCA) cycle.

Principle 3 - Environmental protection and energy use

By using appropriate technical and economic processes in development, production and all other accompanying activities, we ensure that the environment and the resources available to us are treated with care, during mining, in all production processes along the entire value chain, and during site/mine closure.

Beside mining, the conflict-free sourcing of raw materials, the recycling of our products (closed loop) as well as of other tungsten-containing scrap are priorities for us. Furthermore we are committed to a continuous improvement of our management systems in order to improve both our environmental and energy performance, and for the prevention of environmental pollution and waste caused by our operation activities.

We also pay attention to energy efficiency from the procurement process. In this way we can offer our customers environmentally friendly products.

To ensure that all employees and contractors will thoroughly acknowledge their responsibility in environmental protection we provide the necessary information, training and guidelines.

Principle 4 - Communication

Communication is the foundation for success and for a trusting cooperation. That is why we promote employee satisfaction through an open culture of discussion and are committed to the consultation and participation of our employees. We inform our stakeholders openly and transparently. We communicate our corporate policy on request. We inform the relevant parties about the goals derived from this and all binding obligations.

Sources for CAHRAs and due diligence analysis

Beside official EU CAHRAs list and the Democratic Republic of the Congo (DRC) and its nine adjoining countries as outlined in Section 1502 of the Dodd Frank Act, namely Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia

Conflict Affected and High-Risk Areas (CAHRAs)

The RMI encourages responsible sourcing from conflict affected and high risk areas (CAHRAs). The RMI does not provide lists of countries that may be conflict-free or conflict-affected. The nature of conflict is ever-changing, while some conflicts may be country-wide, many conflict-related and high-risk incidents are concentrated on a regional or local level, or involve individual sites, entities, and actors. Once companies identify which conflict-affected and high-risk areas they are sourcing from, both country-level risk assessments and individual supplier due diligence are critical to ensure responsible sourcing of minerals from CAHRAs. In alignment with the [OECD Due Diligence Guidance](#), the RMI provides tools and resources to enable companies to conduct individual and collective due diligence within supply chains to source minerals responsibly.

Definitions

OECD definition of conflict-affected and high-risk areas: Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law.

EU definition of conflict-affected and high-risk areas: Areas in a state of armed conflict, fragile post-conflict areas, as well as areas witnessing weak or non-existing governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.

According to the RMI RMAP Standard, the CAHRAs shall include, at a minimum, countries identified as high-risk by relevant conflict minerals regulation, such as: The Democratic Republic of the Congo (DRC) and its nine adjoining countries as outlined in Section 1502 of the Dodd Frank Act, namely Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia; and, the indicative and non-exhaustive list of

CAHRAs provided by the European Commission pursuant to Article 14.2 of the European Union Regulation 2017/821.

On December 17, 2020 pursuant to Article 14.2 of the European Union Conflict Minerals Regulation 2017/821 the European Commission Directorate General for Trade (DG TRADE) published the indicative, non-exhaustive and regularly updated [list of conflict-affected and high-risk areas \(CAHRAs\)](#).

Key Resources

- <https://www.mvorisicochecker.nl/en> CSR Risk Check, provided by the Dutch and German Government
- [EU CAHRAs List](#) - the indicative, non-exhaustive and regularly updated list of conflict-affected and high-risk areas (CAHRAs).
- [The European Commission non-binding guidelines for the identification of conflict-affected and high-risk areas and other supply chain risks](#) under Regulation (EU) 2017/821.
- [RMI's Country Risk Assessment Tool](#) available to RMI member companies and auditees.

EU CAHRA Guidance: List of open information sources

Note: Thresholds are only mandatory for the CAHRA analysis, but they can also be used as a guide for the DD analysis.

Criterion	Coverage	Open sources	Threshold (risk according to traffic light system)	
			„yellow“	„red“
CONFLICT	Global	Analytical sources:	-	-
		Heidelberg Conflict Barometer	4	5
		Geneva Academy Rule of Law in Armed Conflicts	-	Involved in armed conflict in corresponding area
		Assessment Capacities Project — Global Emergency Overview	2.1 - 3	> 3
		Maps Tables:	-	-
		Uppsala Conflict Data Program — Georeferenced Event Dataset	Number of death 2-10 (last reporting period; development over time)	Number of death >10 (last reporting period)
		CrisisWatch	-	Military activities reported in corresponding area
		CrisisInSight ACAPS	-	Military activities reported in corresponding area, Report about crisis in connection with tungsten
		Global Peace Index	orange on map	red on map
		Major Episodes of Political Violence	Moderate (8-11)	Serious (12-15) – Extreme (20-25)
	Regional	Armed Conflict Location and Event Data	475-1724 events/year	>1724 events/year
		International Peace Information Service — Conflict Mapping	Countries shown are CAHRA due to Dodd Frank Act	
		International Tin Association	Check monthly reports send by iTSCi	
		Mining Conflicts in Latin America	Medium (for tungsten)	High (for tungsten)

GOVERNANCE	Global	Worldwide Governance Indicators	One criterium <15% /	min. three criteria <15% or one criterium <10%
		Fragile States Index	FSI 60,0-89,9	FSI >89,9
		Corruption Perception Index	Score 39-20	Score <20
		National Resource Governance Institute	Composite Score 44-30	Composite Score <30
HUMAN RIGHTS	Global	United Nations Security Council Resolutions (UNSC)	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten
		United Nations Human Rights Council	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten
		Office of the United Nations High Commissioner for Human Rights	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten
		United Nations Development Program — International Human Development Indicators — Country Profiles	Human Development Index 0,699-0,450	Human Development Index <0,450
		Amnesty International	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten
		Global Witness	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten
		Human Rights Watch	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten
		Mines and Communities	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten

Forced Labour and Child Labour	Global	Bureau of International Labor Affairs https://www.dol.gov/agencies/ilab	-	Forced or child labour in connection with the mining of W
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Source: Commission Recommendation (EU) 2018/1149 of 10 August 2018 on non-binding guidelines for the identification of conflict-affected and high-risk areas and other supply chain risks under Regulation (EU) 2017/821 of the European Parliament and of the Council, <https://eur-lex.europa.eu/eli/reco/2018/1149/oj>.

Additional Resources

OECD and EU Guidance

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)

The OECD Due Diligence Guidance provides detailed recommendations to help companies respect human rights and avoid contributing to conflict through their mineral purchasing decisions and practices. This Guidance is for use by any company potentially sourcing minerals or metals from conflict-affected and high-risk areas.

Raw material Resources

[Deutsche Rohstoffagentur – Bundesanstalt für Geowissenschaften und Rohstoffe](#)

Webpage of the German Government

<https://roskill.com/>

Webpage of Wood Mackenzie

<https://www.bgs.ac.uk/>

British Geological Survey

[US Geological Survey](#)

US data on Resources

Sanctions Lists - to identify sanctioned companies / individuals

[US OFAC Sanctions](#)

United States Department of Treasury Office of Foreign Assets Control administers and enforces economic and trade sanctions based on US foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of

weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States.

UN Sanctions

Consolidated United Nations Security Council Sanctions List.

EU Sanctions

Comprehensive list of sanctions imposed by the European Union.

Country Rankings, Maps and Indices - to assist with Risk Assessment

Global Peace Index

The world's leading measure of national peacefulness, the GPI measures peace according to 23 qualitative and quantitative indicators

Heidelberg Conflict Barometer

The Conflict Barometer published annually since 1992 analyses the global conflict events. It includes non-violent and violent crises, wars, coup d'etats as well as peace negotiations.

Control Risk Worldmap

Mapping security and political risks

CrisisInSight | ACAPS

Mapping detailed individual crisis in the world and the severity index as indicators thereof for lots of different categories, each one judged by an index from 1 (very low) to 5 (very high). The categories are Geographical, Human, People in need, Concentration of conditions, Society and safety and Operating environment. The donators and partners are trustworthy and serious.

INFORM worldmap

Humanitarian crisis map (not limited to conflict or security issues)

Know Your Country

Country by country reports of money laundering and sanction information

UNDP International Human Development Indicators – Country Profiles

Interactive tool for human development data from around the world. Data presented was used in preparation of the 2016 UNDP Human Development Report. The Human Development Report Office releases five indices each year: the Human Development Index (HDI), the Inequality-Adjusted Human Development Index (IHDI), the Gender Development Index (GDI), the Gender Inequality Index (GII), and the Multidimensional Poverty Index (MPI).

State Department Human Rights Report

US Department of State country reports on Human Rights

Transparency International (TI)

TI Country Corruption Reports

U.S. Dept. of Labor Report

2018 List of Goods Produced by Child Labor or Forced Labor

World Bank

The World Bank's Worldwide Governance Indicators

World Bank Doing Business Report

The indicators are used to analyze economic outcomes and identify what reforms of business regulation have worked, where and why.

World Justice Project (WJP)

WJP Rule of Law Index, the world's leading source for original, independent data on the rule of law.

The Office of the United Nations High Commissioner for Human Rights (OHCHR)

OHCHR has country pages linking to more specific sub-reports for human rights related topics:

- Example: [OHCHR report for DRC](#)

Resources in other languages and/or region-specific

- China's Overseas Security Risks Blue Book (2018) by National Security Research Department of Renmin University, China Overseas Security Research Institute and China National Petroleum Corporation. This publication focuses on the geopolitical elements. The publication is available in book stores/e-commerce platforms in China. The Paper's press release (in Chinese) on the book's publication is available at http://www.cssn.cn/zx/bwyc/201802/t20180202_3838395.shtml.
- The 2018 Country-risk Rating of Overseas Investment from China report by the Chinese Academy of Social Sciences (CASS). The report is updated annually and its broad range of indicators include e.g. internal conflict, external conflict, government stability, military intervention in politic, etc. The report is

available

at http://en.iwep.org.cn/papers/papers_papers/201801/W020180130339272647312.pdf.

- CASS and China Bond Rating Co., Ltd. work together and published the Blue Book of Outbound Investment and Risks, which includes dedicated sessions on armed conflict, geopolitical context and political stability. The link to the summary of its key findings (in Chinese) is available at <https://www.ssap.com.cn/c/2017-04-12/1053144.shtml>.

Risk Assessment Tools

Risk Readiness Assessment (RRA)

Risk Assessment in Raw Materials Supply Chains assessing social and environmental risks in raw material extraction and processing, and industry's ability to appropriately manage such risks, remains a challenge for downstream companies due to the size and complexity of international supply chains.

RJC Risk Assessment Toolkit

Responsible Sourcing Council Risk Assessment tool for actors across the supply chain.

LBMA Supply Chain Risk Assessment Form

Developed for Good Delivery Refiners to assess Risk level of the business relationship based on supply chain information and sourcing practices evaluation.

Databases and Risk Data Sources

Verisk Maplecroft

Global risk indices, analytics and risk management solutions. Country risk monitoring, customizable risk calculators, dashboards and solutions for assessing and mitigating risk from market entry to project development, operation and closure.

Thomson Reuters World-Check Risk Intelligence

Risk intelligence that serves the Know Your Customer (KYC) and third party risk management of highly regulated industries. For organizations concerned with business relationship risk and financial crime compliance, World-Check helps powers a variety of identity verification, AML/CFT/PEP screening and KYC due diligence processes.

Bureau Van DIJK

Compliance - anti-corruption and third-party due diligence, sanctions resources. Extensive company data, corporate structures and adverse data that delivers fast insight on your customers and business partners, and the individuals behind them for governance, risk management and compliance.

Oeko-Institute

Europe's leading independent research and consultancy organization working for a sustainable future. Provides information on environmental and legal compliance through reports and publicly available research.

ELL Due Diligence Hub

Tools for risk assessment, mitigation, remediation, and reporting.

Other potential Risk Data Sources:

- [BSI](#)
- [Claigan](#)
- [Control Risks](#)
- [Crisis Group](#)
- [The Economist Intelligence Unit \(EIU\)](#)
- [Navanti Group](#)
- [Palantir](#)
- [Verite](#)

Direct Supplier Risk Analysis - 2024

Material 1a - Tungsten Oxide - Vietnam (Masan)	Material 1b - Tungsten Oxide - Germany & Material 2a - Additives (HC Starck GmbH)	Material 1c - Tungsten Oxide - USA (GTP)	Material 2b - Additives - USA & EU (Hoganas)	Material 2c - Additives - Canada (CmCarb)	Material 2d - Additives - Germany (Treibacher)	Material 2e - Additives - USA (Elementis)
<p>Industry-specific risk: 1. Manufacturers of chemical products; 2. Human rights: occupational health and safety; 3. Environmental protection: Pollution of water (drinking water)</p> <p>Resulting Measures: Internal customer covered under "Omni Business Area" disclosure</p>	<p>Industry-specific risk: 1. Manufacturers of chemical products; 2. Human rights: occupational health and safety; 3. Environmental protection: Pollution of water (drinking water)</p> <p>Resulting Measures: Internal customer covered under "Omni Business Area" disclosure</p>	<p>Industry-specific risk: 1. Manufacturers of chemical products; 2. Human rights: occupational health and safety; 3. Environmental protection: Pollution of water (drinking water)</p> <p>Resulting Measures: Sustainability report (Published as "public due diligence FY 2023"), internal process & procedure as well as local laws limit instances of adverse labour practices.</p>	<p>Industry-specific risk: 1. Manufacturers of chemical products; 2. Human rights: occupational health and safety; 3. Environmental protection: Pollution of water (drinking water)</p> <p>Resulting Measures: Sustainability report (Published as "sustainability agenda 2022"), internal process & procedure as well as local laws limit instances of adverse labour practices.</p>	<p>Industry-specific risk: 1. Manufacturers of chemical products; 2. Human rights: occupational health and safety; 3. Environmental protection: Pollution of water (drinking water)</p> <p>Resulting Measures: N/A. EcoVadis puts Canada in the top 1% of all suppliers</p>	<p>Industry-specific risk: 1. Manufacturers of chemical products; 2. Human rights: occupational health and safety; 3. Environmental protection: Pollution of water (drinking water)</p> <p>Resulting Measures: Sustainability report (Published as "Treibacher CARES"), internal process & procedure as well as local laws limit instances of adverse labour practices.</p>	<p>Industry-specific risk: 1. Manufacturers of chemical products; 2. Human rights: occupational health and safety; 3. Environmental protection: Pollution of water (drinking water)</p> <p>Resulting Measures: Sustainability report (Published as "Unique Chemistry, Sustainable Solutions Report"), internal process & procedure as well as local laws limit instances of adverse labour practices.</p>
<p>Country-specific risk (incl. source): 1. Hanoi / UN Focus on children's and women's rights (Human Rights Watch World Report 2023); https://www.hrw.org/sites/default/files/media_2023/01/World_Report_2023_WEBSPREADS_0.pdf</p> <p>Resulting measures: 1. See above</p>	<p>Country-specific risk (incl. source): 1. USA supplier: low risk (Human Rights Watch World Report 2023); https://www.hrw.org/sites/default/files/media_2023/01/World_Report_2023_WEBSPREADS_0.pdf</p> <p>Resulting measures: 1. See above</p>	<p>Country-specific risk (incl. source): 1. USA supplier: low risk (Human Rights Watch World Report 2023); https://www.hrw.org/sites/default/files/media_2023/01/World_Report_2023_WEBSPREADS_0.pdf</p> <p>Resulting measures: 1. See above</p>	<p>Country-specific risk (incl. source): 1. USA supplier: low risk (Human Rights Watch World Report 2023); https://www.hrw.org/sites/default/files/media_2023/01/World_Report_2023_WEBSPREADS_0.pdf</p> <p>Resulting measures: 1. See above</p>	<p>Country-specific risk (incl. source): 1. EcoVadis Platinum Rating; 2. Issues with Environmental Rights and Indigenous Peoples (Human Rights Watch World Report 2023); https://www.hrw.org/sites/default/files/media_2023/01/World_Report_2023_WEBSPREADS_0.pdf</p> <p>Resulting measures: 1. See above</p>	<p>Country-specific risk: 1. Manufacturers of chemical products; 2. Human rights: occupational health and safety; 3. Environmental protection: Pollution of water (drinking water)</p> <p>Resulting Measures: Sustainability report (Published as "Treibacher CARES"), internal process & procedure as well as local laws limit instances of adverse labour practices.</p>	<p>Country-specific risk: 1. Manufacturers of chemical products; 2. Human rights: occupational health and safety; 3. Environmental protection: Pollution of water (drinking water)</p> <p>Resulting Measures: Sustainability report (Published as "Unique Chemistry, Sustainable Solutions Report"), internal process & procedure as well as local laws limit instances of adverse labour practices.</p>

Internal/Own Business Area Risk Analysis - 2024

Risk	Goslar						Sarnia							
	Probability of entry (E): 0 = not relevant, 1 = very low risk 2 = low risk 3 = medium risk 4 = high risk 5 = very high risk (in case of zero, please only give reasons, no further fields need to be filled in)	Justification	Severity (S) of injury according to Degree, number of people affected and irreversibility: 1 = very low 2 = low 3 = medium 4 = high 5 = very high	Influence Options (O): 1 = very low 2 = low 3 = medium 4 = high 5 = very high	Contribution to causation (V) of the company: 1 = very low 2 = low 3 = medium 4 = high 5 = very high	Result (E'S'A'V) (Measure if result for individual risks >80)	Action (if necessary): what measure, responsibility, deadline	Reason for analysis: (E): 0 = not relevant 1 = very low risk 2 = low risk 3 = medium risk 4 = high risk 5 = very high risk (in case of zero, please only give reasons, no further fields need to be filled in)	Justification	Severity of injury after Degree, number of people affected and irreversibility: 1 = very low 2 = low 3 = medium 4 = high 5 = very high	Possible influences: 1 = very low 2 = low 3 = medium 4 = high 5 = very high	Causal contribution of the company: 1 = very low 2 = low 3 = medium 4 = high 5 = very high	Result (E'S'A'V) (Measure if result for individual risks >80)	Action (if necessary): what measure, responsibility, deadline
Violation of the prohibition of child labor (Nos. 1 and 2)	0	1	1	5	5	25		0	1	1	5	5	25	
Violation of the prohibition of forced labor and all forms of slavery (No. 3 and No. 4)	0	1	1	5	5	25		0	1	1	5	5	25	
	0	2	3	4	4	96	Fertlaufend: Arbeitssicherheitsrundgänge, Critical Incident Report, BGM, Unfallanalyse	0	2	3	4	4	96	occupational safety tours, critical incident report, BGM, accident analysis
Disregard for occupational health and safety and work-related health hazards (No. 5)	0	0				0		0	0				0	
Infringement of the prohibition of unequal treatment in employment (No 7)	0	2	2	4	4	64		0	2	2	4	4	64	
Infringement of the prohibition of deprivation of adequate wages (No 8)	0	0				0		0	0				0	
Destruction of the natural basis of life due to environmental pollution (No. 9)	0	2	3	5	5	150	Einhaltung aller gesetzlichen / versicherungstechnischen Vorgaben, Stand der Technik und Genehmigungsverfahren	0	2	3	5	5	150	Compliance with all legal/insurance requirements, state of the art and approval requirements
Unlawful violation of land rights (No. 10)	0	0				0	14001, EMAS, Delegates	0	0				0	
Violation of the prohibition of the commissioning or use of private/public security forces, which may lead to impairments due to lack of instruction or control (No. 11)	0	1	1	4	3	12	External plant security who is also only active here in the plant with precisely defined tasks, compliance audits are carried out	0	1	1	4	3	12	
Infringement of the prohibition of [...] act or omission in breach of duty, which is directly likely to impair a protected legal position (= further human rights) in a particularly serious way and the illegality of which is obvious on a reasonable assessment of all relevant circumstances (No. 12)	0	2	2	4	4	64	Compliance with legal requirements and Code of Conduct, whistleblowers as a complaint option	0	2	2	4	4	64	
Violation of a prohibition resulting from the Minamata Convention (Nos. 1-3)	0	0				0	No products, raw materials or processes containing mercury	0	0				0	
Violation of the prohibition of the production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of waste containing POPs (Nos. 4 and 5)	0	0				0	Persistent Organic Pollutants are not used	0	0				0	
Violation of the prohibition on the import and export of hazardous waste within the meaning of the Basel Convention (Nos. 6-8)	0	1	2	3	3	18	ISO 14001, EMAS, disposal of all waste via an approved waste	0	1	2	3	3	18	

Indirect Supplier - Risk Analysis 2024 Action Plans

For each supplier with combined score <10

Type	Supplier	Supplier #	Location	Country Risk	Impact/Severity	Risk Score
Graphite Parts	Henschke GmbH	54270	EU	1-5 (1 low, 5 high) 4	1-5 (1 low, 5 high) 5	>20 = action plan needed 20
<p>Summary: Henschke poses a significant risk as parts made in China, sent to Germany and then shipped to Canada. Henschke doesn't have control over the day-to-day operations of the China facility.</p> <p>Actions: Audit process/procedure & training records for China factory to ensure process & procedure is up to current labour standards, all employees are trained on these procedures and periodic audits are conducted to ensure compliance.</p> <p>Results: Documentation submitted and reviewed in detail which showed Henschke & their Chinese contract manufacturer to be in compliance with generally accepted labour standard & practises.</p> <p>Recommendations: Corporate/Group on site audit on Chinese contract manufacturer in future</p>						

Indirect Supplier - Risk Analysis 2023

Type	Supplier	Supplier #	Location	Country Risk		Impact/Severity	Risk Score	Notes
				1-5 (1 low 5 High)	1-5 (1 low 5 High)			
Flanges G	Andcor Carbon	71113	USA	1	3	5	USA supplier, low risk	
Drums	HC Blanks GmbH	71947	Germany	1	5	5	EU supplier, low risk	
Pallets/Dunnage	Blumax Pallet	64166	Canada	1	3	3	Canada supplier, low risk	
Furnace Parts	RCM FURNACES INC.	64584	USA	1	5	5	USA supplier, low risk	
Gasketing & Bolting	A.R. Thomson Group	84700	Canada	1	5	5	Canada supplier, low risk	
Fast Tools etc	Heat Treat Control	77827	USA	1	5	5	Canada supplier, low risk	
Misc MRO	ICKLANDS - GRANGER INC	64499	Canada	1	3	3	Canada supplier, low risk	
Misc Parts	Advanced Servo	83300	Canada	1	3	3	Canada supplier, low risk	
Heat Exchangers	AKS Laval Inc	82038	Canada	1	3	3	Canada supplier, low risk	
Misc Assemblies & Plaques	All Seasons Toolbits & Stone	70588	Canada	1	1	1	Canada supplier, low risk	
Mechanical Fabrications	Alliance Fabricating Ltd	78149	Canada	1	5	5	Canada supplier, low risk	
MRO Parts	Anson GmbH	80885	Germany	1	3	3	Canada supplier, low risk	
Lab Equipment & Parts	Analyt. Jena US LLC	82512	USA	2	5	10	USA supplier, low risk	
MRO Parts	APK THERMAL	78929	USA	1	3	3	USA supplier, low risk	
MRO Parts	ARJ Engineering Inc.	77851	USA	1	2	2	USA supplier, low risk	
Promo Materials	Arti Kalleweit & Promotion	82187	Germany	1	1	1	EU supplier, low risk	
Compressor Parts	COPCO COMPRESSORS C	64570	Canada	1	5	5	Canada supplier, low risk	
Lab Equipment & Parts	ATS Scientific Inc.	84541	Canada	2	5	10	Canada supplied, sourced from EU, USA, Canada & APAC	
IT Supplies & Equip	Auxilium Multimedia	77057	Canada	1	2	2	Canada supplier, low risk	
IT Supplies & Equip	Baysar Business Solutions	80719	Canada	1	5	5	Canada supplier, low risk	
Promo Materials	Bano Promotional Products I	84124	Canada	3	2	6	Canadian supplier, low risk. Using textiles primarily sourced offshore in compliance with local import laws. Purchased through local distributors.	
Burner Parts	Black McDowell Limited	70707	Canada	1	5	5	Canada supplier, low risk	
MRO Parts	Bray Sales Ontario	81584	Canada	1	2	2	Canada supplier, low risk	
Misc WMP for Production	Buffalo Tungsten Inc.	84221	USA	1	2	2	USA supplier, low risk	
MRO Parts	Burns Innovation LLC	84603	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	CANADIAN BEARINGS L	64534	Canada	1	5	5	Canada supplier, low risk	
MRO Parts	Canadian IPO Corporation	84520	Canada	1	5	5	Canada supplier, low risk	
MRO Parts	RICHOCHET ENGINEERING L	84814	Canada	1	3	3	Canada supplier, low risk	
MRO Parts	CB Automation Inc.	70002	USA	1	2	2	USA supplier, low risk	
Radios	Calvert Communications Ltd	71205	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	CEM Equipables Inc.	68845	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Charles Tennant & Co.	71375	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Cly Electric Supply (CEB)	79774	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Canadian Automation LLC	77398	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	CM FURNACES INC.	64585	USA	1	2	2	Canada supplier, low risk	
MRO Parts	Comarco Equipment Limited	83058	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Compass Wipe Cloth Corp.	70754	USA	2	2	2	USA supplier, low risk. Using screen material sourced from APAC & EU with control over APAC factory in compliance with local laws and US import laws.	
MRO Parts	Contra Valve Inc.	77145	Canada	1	2	2	Canada supplier, low risk	
IT Supplies & Equip	Communications Manager	70383	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	DAVIS CONTROLS LTD.	89178	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Doak Door Company Ltd	76077	Canada	1	2	2	Canada supplier, low risk	
Propane	DOWLER KARN	80113	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Dry Coolers Inc.	80081	USA	1	3	3	USA supplier, low risk	
Electrical parts	onIndustrial Canada Comc	78428	Canada	1	5	5	Canada supplier, low risk. Sourced globally, large company with good reputation	
Outside Processing	Elan Industries	81852	USA	1	5	5	USA supplier, low risk	
MRO Parts	EMCO Corporation	70002	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	EMO Milling Corporation	83909	USA	1	5	5	USA supplier, low risk	
Compressor Parts	RESS & HAUSER CANADA I	64774	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Ervada Filter Manufacturers	77871	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Ertac Manufacturing Ltd	84900	Canada	1	2	2	Canada supplier, low risk	
Hoses/MRO	Erika Industrial Services LP	84587	Canada	1	2	2	Canada supplier, low risk	
Electrical parts	ESAC Electrical & Systems	77941	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	EUJ	80523	EU	1	2	2	EU supplier, low risk	
MRO Parts	Everest Automation Inc.	84220	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	FESTO Inc.	82549	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Fisher Company	70561	Canada	1	2	2	Canada supplier, low risk	
Lab Equipment & Parts	FISHER SCIENTIFIC LLC	64583	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Flexicon Corporation	89971	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Flexim Canada Ltd.	64489	Canada	1	2	2	Canada supplier, low risk	
Lab Equipment & Parts	Foerster Instruments Inc.	84539	USA	1	5	5	USA supplier, low risk	
MRO Parts	Franklin Empire	80042	Canada	1	2	2	Canada supplier, low risk	
Electrical parts	GESCAN	84681	USA	2	5	10	USA supplier, low risk. Sourced globally, large company with good reputation	
MRO Parts	GFS CHEMICALS INC.	88831	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Global Industrial Canada	83424	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	T LAKES INDUSTRIAL CON'	84518	Canada	1	2	2	Canada supplier, low risk	
Drums	Greif Inc.	84044	USA	1	5	5	USA supplier, low risk	
Compressor Parts	3TA Compressor Solutions In	77092	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	I-G-N INDUSTRIAL FABRIC	80237	Canada	1	2	2	Canadian supplier, low risk. Using textiles primarily sourced offshore in compliance with local import laws. Purchased through local distributors.	
MRO Parts	INDUSTRIAL PRINTING LTD	85661	Canada	1	2	2	Canada supplier, low risk	
MRO Parts/Hoses	LMARK HOSE HEADQUART	64523	Canada	1	2	2	Canada supplier, low risk	
Service	Hawaya Bird Control Inc.	84034	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	HAWKARD GORDON LLC	84029	Canada	1	2	2	Canada supplier, low risk	
Graphite Parts	Henzelka GmbH	64270	EU	4	5	20	Significant Risk as parts made in China, sent to Germany and then shipped to Canada.	
Electrical parts	JSOKAWA ALPINE Comaact	80339	EU	1	2	2	EU supplier, low risk	
Electrical parts	Johel Electric Heater Comaact	84909	Canada	1	2	2	Canada supplier, low risk	
Printing	HURON REPRO GRAPHICE	64888	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	IFM Ector Canada Inc.	82979	Canada	1	2	2	Canada supplier, low risk	
Clothing	maas division of Maas'	71207	Canada	1	2	2	Canadian supplier, low risk. Using textiles primarily sourced offshore in compliance with local import laws. Purchased through local distributors.	
MRO Parts	Inductohem Group Canada	71480	Canada	1	2	2	Canada supplier, low risk	
MRO Parts	Industrial Metal Fabricators	71981	Canada	1	2	2	Canada supplier, low risk	
Lab Equipment & Parts	Industrial Motion Corp.	80731	Canada	1	2	10	Canada supplier, low risk	
IT Supplies & Equip	Insight Canada Inc.	88020	Canada	1	2	2	Canada supplier, low risk	
Clothing	International Sew Right	71780	Canada	2	1	2	Canadian supplier, low risk. Using textiles primarily sourced offshore in compliance with local import laws. Purchased through local distributors.	
Electrical parts	Istex GmbH	80051	EU	1	2	2	EU supplier, low risk	
MRO Parts	Ivy Adsorption Inc.	84022	USA	1	5	5	USA supplier, low risk	
MRO Parts	Joest Inc.	78741	EU	1	2	2	EU supplier, low risk	
MRO Parts	Jose GmbH & Co. KG	82274	EU	1	2	2	EU supplier, low risk	
MRO Parts	Karl Durgel Inc.	78134	USA	1	2	5	USA supplier, low risk	
Engineering Services	Kertz Canada Ltd.	64619	Canada	1	1	1	Canada supplier, low risk	
Water	Kem Water Systems Inc.	71532	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	Kim Kurotsuchi	70656	EU	1	2	2	EU supplier, low risk	
MRO Parts	Kleinar Products Co.	89862	USA	1	5	5	USA supplier, low risk	
MRO Parts	3BOLD Instruments Canada I	80547	Canada	1	1	1	Canada supplier, low risk	
Overhead Cranes	Kromerex Canada Inc.	84905	Canada	1	1	1	Canada supplier, low risk	
Engineering Services	SIDE PROCESS CONTROL	64520	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	LAMBERT ALLOYS	88821	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	Lamson Canada Limited	84787	Canada	1	1	1	Canada supplier, low risk	
IT Supplies & Equip	Leadwave Technologies Inc.	70500	Canada	1	1	1	Canada supplier, low risk	
Lab Equipment & Parts	LECO INSTRUMENTS LTD.	84905	USA	1	5	5	USA supplier, low risk	
MRO Parts	Leotron LLC	79287	USA	1	5	5	USA supplier, low risk	
MRO Parts	Levico	81884	USA	1	5	5	USA supplier, low risk	
Safety Supplies	Levitt Safety	84200	Canada	1	1	1	Canada supplier, low risk	
Overhead Cranes	Lifsafe Engineering & Service	78814	Canada	1	1	1	Canada supplier, low risk	
Forklifts	Liftway Limited	78400	Canada	1	1	1	Canada supplier, low risk	
Glasses	Linde Canada Inc.	80878	Canada	1	1	1	Canada supplier, low risk	
Capital Parts	LIPTON HADGERTY	84482	USA	1	5	5	USA supplier, low risk	
MRO Parts	Louis Renner GmbH	62099	EU	1	2	2	EU supplier, low risk	
MRO Parts	MI SWECO	71028	USA	1	5	5	USA supplier, low risk	
Services	MacWall Machining Ltd	72477	Canada	1	5	5	Canada supplier, low risk	
Lab Equipment & Parts	Malvern Panalytical Inc.	77068	USA	1	5	6	USA supplier, low risk	
Office	MANLEY BASICS	64637	Canada	1	1	1	Canada supplier, low risk	
IT Supplies & Equip	MD Business Solutions	81714	Canada	1	1	1	Canada supplier, low risk	
Services	METOSH MECHANICAL INC	71293	Canada	1	5	5	Canada supplier, low risk	
MRO Parts	McMaster - Carr Supply Co.	70425	USA	1	5	5	USA supplier, low risk	
Glasses	Messer Canada Inc. 1569F	84642	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	Milwaukee Technology AB	80108	Canada	1	1	1	Canada supplier, low risk	
Scales	METTLER-TOLEDO INC.	84487	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	Moricon Filtration Canada Co.	84947	Canada	1	1	1	Canada supplier, low risk	
Safety Supplies	Moser Safety Shoes Inc.	77865	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	M.S Safety GmbH	82503	EU	1	2	2	EU supplier, low risk	
MRO Parts	TEC Gesellschaft für Industri	88887	EU	1	2	2	EU supplier, low risk	
MRO Parts	ION INDUSTRIES CANADA	84564	Canada	1	1	1	Canada supplier, low risk	
Compressor Parts	National Compressed Air Ltd	83542	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	NOVA TECH INC.	89738	Canada	1	1	1	Canada supplier, low risk	
IT Supplies & Equip	ONN - TEL	87391	Canada	1	1	1	Canada supplier, low risk	
Service	On Power Systems	70720	Canada	1	1	1	Canada supplier, low risk	
MRO Parts/Hoses	ORIO HOSE SPECIALTIES LP	84920	Canada	1	1	1	Canada supplier, low risk	
Lab Equipment & Parts	Opto-Tech Scientific Inc.	83059	Canada	1	1	1	Canada supplier, low risk	
Service	OSP Contractors Inc.	83003	Canada	1	1	1	Canada supplier, low risk	
MRO	CO SALES & DISTRIBUTOR:	89885	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	PATON CONTROLS LTD.	85197	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	PHYNKAMPS	89200	USA	1	5	5	USA supplier, low risk	
MRO Parts	Pneumatik- und Erntebaubus	65129	USA	1	5	5	USA supplier, low risk	
MRO Parts	Precision Elomring	84883	Canada	1	5	5	Canada supplier, low risk	
MRO Parts	Price-Schönstrom Inc.	70232	USA	1	5	5	USA supplier, low risk	
MRO Parts	PROAX Technologies	78873	Canada	1	1	1	Canada supplier, low risk	
Uniforms	ROCLAN Industrial Laundry	84627	Canada	2	1	1	Canadian supplier, low risk. Using textiles primarily sourced offshore in compliance with local import laws. Purchased through local distributors.	
MRO Parts	ESSONAL VALVE SERVICE	64255	Canada	1	1	1	Canada supplier, low risk	
Lab Equipment & Parts	ProScience	79136	USA	1	5	5	USA supplier, low risk	
MRO Parts	Praxair Ltd.	77131	USA	1	5	5	USA supplier, low risk	
MRO Parts	PSI Probel Inc.	77375	USA	1	5	5	USA supplier, low risk	
Chemicals	Quadant Canada Ltd	84284	Canada	1	1	1	Canada supplier, low risk	
Service	R.P.S. MACHINE & SALES	89569	Canada	1	1	1	Canada supplier, low risk	
Electrical parts	Rohlf Canada Automation Ltd	84459	Canada	1	1	1	Canada supplier, low risk	
Service - RCF	REFTECH INTERNATIONAL	70098	Canada	1	1	1	Canada supplier, low risk	
Graphite Parts	SGI CARBON LLC	81853	USA	1	5	5	USA supplier, low risk	
Electrical parts	Sironix Canada Inc.	84402	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	Russell Finex	75304	USA	1	5	5	USA supplier, low risk	
Electrical parts	SANDRIN SERVICES INC.	87280	Canada	1	1	1	Canada supplier, low risk	
Service	Sandri Cabinets Ltd.	89036	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	NIA FLUID SYSTEMS TECH	84521	Canada	1	1	1	Canada supplier, low risk	
Service	nia Wolverine Manufacturing	84904	Canada	1	1	1	Canada supplier, low risk	
Capital Parts	EU	83139	EU	1	1	1	EU supplier, low risk	
Electrical parts	ION Instruments Canada Lim	85098	Canada	1	1	1	Canada supplier, low risk	
Service	Servit Fire Protection Service	70766	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	Servit Filtration Of Canada	70544	Canada	1	1	1	Canada supplier, low risk	
MRO Parts	ico Division of Sonecar Cana	86071	Canada	1	1	1	Canada supplier, low	

Electrical parts	IMT INSTRUMENT SPECIAL	04484	Canada	1	1	1	Canada supplier, low risk
MRO Parts	Sweco Europe	70303	USA	1	5	5	USA supplier, low risk
MRO Parts	ivotec Process Equipment Lt	70866	Canada	1	1	1	Canada supplier, low risk
MRO Parts	T J MCCARTHY LTD	04517	Canada	1	1	1	Canada supplier, low risk
Service	T R E L OF SARNIA	04497	Canada	1	1	1	Canada supplier, low risk
Chemicals	NICAL CHEMICAL SERVICE	04613	Canada	1	1	1	Canada supplier, low risk
Electrical parts	Telonic Canada Inc.	04500	Canada	1	1	1	Canada supplier, low risk
Electrical parts	Telonic Ultrasonics	71800	USA	1	5	5	USA supplier, low risk
MRO Parts	INNANT SALES AND SERVII	04610	Canada	1	1	1	Canada supplier, low risk
MRO Parts	Thorburn Flex Inc	70548	Canada	1	1	1	Canada supplier, low risk
Service	TISI Canada Inc.	70507	Canada	1	1	1	Canada supplier, low risk
MRO Parts	TRNADO INSULATION SARN	04810	Canada	1	1	1	Canada supplier, low risk
Outside Processing	Towards Mediapne Inc	04012	USA	1	5	5	USA supplier, low risk
Electrical parts	TRANSCAT	05279	Canada	1	1	1	Canada supplier, low risk
MRO Parts	TTG Systems Incorporated	05012	USA	1	5	5	USA supplier, low risk
MRO Parts	Uline Canada	76448	Canada	1	1	1	Canada supplier, low risk
MRO Parts	Valtech Inc.	04433	Canada	1	1	1	Canada supplier, low risk
Electrical parts	J INSTRUMENT & CONTROL	00175	Canada	1	1	1	Canada supplier, low risk
MRO Parts	Vicore Sales Corp	04037	Canada	1	1	1	Canada supplier, low risk
MRO Parts	Volkman	70785	USA	1	5	5	USA supplier, low risk
Lab Equipment & Parts	VWR INTERNATIONAL CO.	04514	USA	1	5	5	USA supplier, low risk
Lab Equipment & Parts	W S Tyler	04503	USA	1	5	5	USA supplier, low risk
MRO Parts	WJAJX Limited	05300	Canada	1	1	1	Canada supplier, low risk
MRO Parts	Warex Valve GmbH	00708	EU	1	2	2	EU supplier, low risk
MRO Parts	WCO DISTRIBUTION-CANAD	04464	Canada	1	1	1	Canada supplier, low risk
Electrical parts	WESTBURN RUDDY ELECTF	05812	Canada	1	1	1	Canada supplier, low risk
IT Supplies & Equip	Western I.T. Group	02602	Canada	1	1	1	Canada supplier, low risk
MRO Parts	Weston Valve & Fitting Ltd	04059	Canada	1	1	1	Canada supplier, low risk
MRO Parts	Volstelev Industrial Canada In	05401	Canada	1	1	1	Canada supplier, low risk
Clothing	Work Authority	70551	Canada	2	1	2	Canadian supplier, low risk. Using textiles primarily sourced offshore in compliance with local import laws. Purchased through local distributors.
MRO Parts	WS Thermal Technology Inc.	70135	USA	1	5	5	USA supplier, low risk
MRO Parts	Xerion Advanced Heating	01203	USA	1	5	5	USA supplier, low risk
IT Supplies & Equip	XEROX Canada Ltd.	00852	Canada	1	1	1	Canada supplier, low risk