



a group company of  MITSUBISHI STEEL MFG. CO., LTD.

## MSSC Inc. Report On Forced Labour in Canadian Supply Chains Financial Year Ended 2024 - **REVISED REPORT**

### Entity Structure, Activities, and Supply Chains

MSSC Inc. is a leading North America Tier One automotive supplier to domestic and offshore OEMs. We offer a range of automotive suspension components including coil springs, torsion bars and stabilizer bars. We have manufacturing operations in Canada, United States and Mexico.

MSSC Inc.'s supply chains include the sourcing of raw materials, components, tooling, and services from suppliers located in North America and other international jurisdictions. These supply chains may involve multiple tiers of suppliers, including indirect suppliers not in a direct contractual relationship with MSSC Inc.

The Materials and Purchasing department maintains an approved supplier list and is responsible for collecting, monitoring and auditing supplier compliance documentation.

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### 2. Policies and Due Diligence Processes

MSSC Inc. is dedicated to upholding social responsibility by fostering ethical, transparent, and accountable practices throughout our operations and supply chain. We strive to positively impact our employees, communities, and stakeholders by actively promoting human rights, fair labor standards, environmental stewardship, and the prevention of modern slavery and child labor.

MSSC Inc. maintains policies and procedures designed to prevent forced labour and child labour within its operations and supply chains. These include:

- MSSC HR staff uses due diligence and best practice in validating identification documents presented during onboarding process to verify age of candidates to ensure they meet minimum working age requirements in the region for which they are working. Furthermore, MSSC prohibits employment of anyone under the age of 18, even if permitted under local law.
- MSSC ensures that all recruitment efforts performed by 3rd party contractors, includes mechanisms to verify appropriate age requirements in the recruitment process.
- MSSC provides annual Code of Conduct training in all of its four locations
- MSSC's supplier contractual terms require compliance with applicable labour and human rights laws
- MSSC's procurement procedures include an internal review processes for supplier onboarding and approval

Due diligence activities are integrated into procurement, supplier management, and compliance functions to identify potential labour-related risks.

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### 3. Risk Identification in Activities and Supply Chains

MSSC Inc. recognizes that risks of forced labour or child labour may exist in certain parts of global supply chains, particularly in relation to:

- Raw material extraction and processing
- Lower-tier suppliers outside Canada and the United States
- Labour-intensive manufacturing sectors



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The company assesses these risks using available information, including supplier disclosures, geographic risk indicators, and customer-driven compliance requirements. Where potential risks are identified, MSSC Inc. takes steps to assess and manage those risks through engagement and contractual controls.

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#### **4. Measures Taken to Assess and Manage Risk**

During the reporting period, MSSC Inc. undertook the following measures to prevent and reduce forced labour and child labour risks in its supply chain:

- Apply our Business Code of Conduct
- Require that any potential violations of our Code be reported with whistleblower protections in place
- Provide a confidential, Employee Helpline managed by our Corporate Office and or/ an independent third party, investigating reported concerns, and implementing appropriate actions
- Enforce our purchasing, human resources, and occupational health and safety policies
- Internal awareness efforts within procurement and supply chain functions

These measures are intended to support compliance with our Code of Conduct as well as the Act and continuous improvement of supply chain transparency.

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#### **5. Remediation of Forced Labour or Child Labour**

MSSC Inc. did not identify any confirmed instances of forced labour or child labour within its operations or direct supply chains during the reporting period.

If such instances were to be identified, MSSC Inc. would take appropriate steps to address the issue, which may include supplier engagement, corrective action plans, or termination of supplier relationships, as appropriate.

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#### **6. Training Provided to Employees**

During the reporting period, MSSC Inc. provided Code of Conduct training to relevant employees including the following topics :

1. Human Rights and the Workplace Environment
2. Safety and Health
3. Fair Competition
4. Materials Procurement
5. International Trade
6. Anti-Corruption and Elimination of Relationships with Anti-social Forces
7. Insider Trading
8. Products and Services
9. Environmental Conservation
10. Conflicts of Interest
11. Protection of Assets
12. Intellectual Property
13. Information Security
14. Financial Integrity
15. Reporting Violations
16. Sanctions

Training specifically related to forced labour and child labour risks may be expanded in future reporting periods as part of ongoing compliance efforts.

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## 8. Assessing Effectiveness

MSSC Inc. assesses the effectiveness of its measures to prevent forced labour and child labour through:

- Periodic review of supplier requirements
- Monitoring of customer compliance expectations
- Internal discussions within procurement and compliance teams
- Review of supplier contractual obligations related to labour practices

These assessments are qualitative in nature and support continuous improvement of supply chain risk management.

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## 9. Approval and Attestation

In accordance with **section 11(4)(a)** of the Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in this report for MSSC Inc. and all of its entities. 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.

Signed:   
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**Name:** Kenneth Helton

**Title:** President and General Manager, MSSC Inc.

**Revision Date:** May 7, 2026

