

MODERN SLAVERY STATEMENT FY2024

This Modern Slavery Statement for Marubeni-Itochu Steel Canada Inc. is made pursuant to Part 2 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act. S.C.2023, c.9 for the financial year April 01, 2024, to March 31, 2025.



Fighting Against Forced Labour and Child Labour in Supply Chains Annual Report FY2024

TABLE OF CONTENTS

- 1. The Reporting Entity 3**
- 2. About MISC 3**
 - 2.1 Structure 3
 - 2.2 Operations..... 4
 - 2.3 Workforce 4
 - 2.4 Supply Chain..... 4
- 3. Modern Slavery Risks 5**
 - 3.1 Potential Modern Slavery risks in operations..... 5
 - 3.2 Potential Modern Slavery risks in supply chain 5
- 4. Remediation measures..... 5**
- 5. Actions will be taken to address Modern Slavery risks in supply chain 5**
 - 5.1 Supplier Due Diligence 5
 - 5.2 Modern Slavery policy and Supplier Code of Conduct 6
 - 5.3 Engagement, training, and education 6
- 6. Assessing the effectiveness 6**
- 7. Consultation 6**
- 8. Relevant Information 6**
- 9. Approval and Attestation 7**



1. The Reporting Entity

Marubeni—Itochu Steel Canada Inc.

This report has been prepared in accordance with Part 2 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023, c.9 (the “Modern Slavery Act”), and outlines the activities of Marubeni-Itochu Steel Canada Inc. (“MISC”) (BN 878723519) for the financial year ended March 31, 2025 (the “Reporting Period”).

This marks MISC’s inaugural report under the Modern Slavery Act. During the Reporting Period, MISC commenced the assessment of modern slavery risks and began implementing measures to address these risks. We remain firmly committed to the ongoing evaluation and strengthening of our response to modern slavery.

The purpose of this report is to outline MISC’s approach within the context of our broader compliance and risk management frameworks, which are designed to mitigate the risks of modern slavery within our operations and supply chains.

MISC is dedicated to maintaining high standards of ethical conduct and expects the same commitment from its vendors and suppliers. We strive to ensure that our trading partners reflect our values and adhere to responsible business practices.

MISC unequivocally condemns all forms of modern slavery and is committed to addressing, to the best of our ability, the risks of its occurrence within our business operations and supply networks. We recognize the profound impact of modern slavery and support global efforts to identify, address, and prevent such practices.

For the purposes of this report, the term “modern slavery” encompasses both forced labour and child labour, as defined under the Modern Slavery Act.

2. About MISC: Structure, Operations and Supply Chains

2.1 Structure

Marubeni-Itochu Steel Canada Inc. (“MISC”) was incorporated under the Canada Business Corporations Act on September 6, 2001. MISC is a wholly owned subsidiary of Marubeni-Itochu Steel America Inc. (“MISA”), headquartered in New York. MISA, in turn, is wholly owned by Marubeni-Itochu Steel Inc. (“MISI”), a joint venture between Marubeni Corporation and Itochu Corporation of Japan. MISC operates from two office locations in Canada: one in Greater Vancouver and the other in Toronto.



2.2 Operations

MISC's operations encompass general trading and the importation of steel products, alongside offering supply chain management services.

In its trading operations, MISC delivers a comprehensive suite of services. This includes procuring and importing various steel products like steel plates, bars, pipes, tubing, and coils from both domestic and international sources. Leveraging MISC's global integrated network, MISC facilitates overseas and local logistics, as well as brokerage services, ensuring efficient delivery to steel service centers and customers within the construction industries.

In the realm of supply chain management, MISC offers end-to-end inventory management services. This involves purchasing, warehousing, processing, and delivering electrical steel, stainless steel, and carbon steel products to manufacturers of electric transformers and automotive components across the Eastern region of Canada.

2.3 Workforce

As of March 31, 2025, MISC employed 16 staff members across its two offices in Greater Vancouver and Toronto. These employees support a range of functions, including Sales, Procurement, Logistics, Administration, and Executive Management.

2.4 Supply Chains

Within its supply chains, MISC primarily relies on foreign steel mills, as well as domestic logistics and brokerage service providers. During the Reporting Period, MISC directly and indirectly sourced products and services from a diverse network of over 100 suppliers, primarily located in the United States, Taiwan, Japan, Korea, Singapore and China. MISC also collaborates with other Marubeni-Itochu Steel companies worldwide, leveraging their expertise and roles as agents to support procurement activities.

MISC sources electrical steel, stainless steel, and carbon steel from various countries, including Japan, China, Taiwan, Vietnam, Indonesia, and Brazil, to serve customers in the electricity transformer and automotive sectors in Ontario and Quebec. In Western Canada, MISC supplies steel plates, bars, pipes, tubing, and coils tailored to the needs of commercial construction contractors. Additionally, MISC provides materials to steel service centers and distributors across Canada.



3. Modern Slavery Risks

MISC is committed to the ongoing assessment of modern slavery risks within both its internal operations and its supply chains. Given the company's engagement with a diverse range of foreign steel mills, MISC recognizes the potential exposure to modern slavery risks in its business activities. Acknowledging this responsibility, MISC remains dedicated to identifying, mitigating, and reducing these risks across all areas of its operations and supply network.

3.1 Potential Modern Slavery risks in operation

MISC operates exclusively within Canada, with offices located in Greater Vancouver and Toronto. The company maintains strict human resources policies designed to safeguard employees from harm, harassment, and exploitation. These policies fully comply with the Canadian Charter of Rights and Freedoms, as well as applicable federal and provincial labour standards. Based on comprehensive risk assessments, MISC has determined that the risk of modern slavery within its direct operations is very low and remains committed to upholding this standard through ongoing monitoring and preventative measures.

3.2 Potential Modern Slavery risks in supply chain

MISC recognizes both industry-specific and geographic risks associated with modern slavery in the sectors in which it operates. The company sources goods and services from industries known to carry potential modern slavery risks, including steel production, transportation, and logistics.

While many of MISC's suppliers are based in countries with a low estimated prevalence of modern slavery, the company has also identified sourcing from regions with higher risk levels. MISC acknowledges the complex and layered nature of global supply chains and understands that limited visibility beyond its direct suppliers may increase the potential for modern slavery risks among indirect suppliers.

4. Remediation measures

During the Reporting Period, MISC did not identify any instances of modern slavery within its operations or supply chains. As a result, no remedial actions were required or undertaken in relation to modern slavery during this period.

5. Actions have been taken to address Modern Slavery risks in supply chain

5.1 Suppliers Due Diligence

MISC has proactively assessed its exposure to modern slavery risks by analyzing supplier expenditure data alongside the Global Slavery Index 2023. This analysis has helped identify suppliers operating in high-risk industries and regions. As part of its risk-based approach, MISC is prioritizing due diligence and review of high-value, first-tier suppliers within these categories. Looking ahead, MISC intends to expand its due diligence efforts to include second-tier suppliers operating in similarly high-risk sectors and regions.



To support its modern slavery mitigation efforts, MISC has engaged third-party experts and developed a supplier questionnaire to assess supplier practices. During the Reporting Period, this questionnaire was distributed to MISC's top-tier suppliers, with positive responses received from 15 first-tier suppliers. Under MISC's updated procurement policy, completion of the questionnaire is now a mandatory requirement for all new suppliers.

5.2 Modern Slavery policy and Supplier Code of Conduct

MISC is collaborating with third-party experts to develop and implement a Modern Slavery Policy and a Supplier Code of Conduct, which suppliers will be required to adhere to. These initiatives are intended to strengthen MISC's commitment to ethical business practices, enhance social responsibility, and promote accountability throughout its supply chains.

5.3 Engagement, training, and education

During the Reporting Period, all MISC employees completed Modern Slavery Awareness Training. This training has also been integrated into the onboarding program for all new employees.

6. Assessing the effectiveness

MISC is committed to the ongoing evaluation and enhancement of its modern slavery prevention processes through regular reviews. Oversight of these efforts will be entrusted to the Compliance Committee, which will monitor and periodically assess progress to ensure the continued effectiveness of our approach. MISC remains dedicated to strengthening its practices and advancing the management of modern slavery risks.

7. Consultation

MISC does not own or control another entity. This statement was reviewed by the MISC management team and approved by the Board of Directors.

8. Relevant Information

MISC representatives will pursue opportunities to attend seminars conducted by public or private entities on modern slavery. Additionally, MISC will remain vigilant in staying informed about modern slavery developments and will endeavor to implement best practices in assessing and addressing risks that may arise within its organization and its supply chains.



9. Approval and Attestation

In accordance with the requirements of the Act, specifically section 11, I hereby attest that I have reviewed the information contained in this report. Based on my best knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respect for the purpose of the Act, for the reporting year specified above. I have the authority to bind Marubeni-Itochu Steel Canada Inc.

A handwritten signature in black ink that reads "Junichi Irie".

Full Name: Junichi Irie
Title: President