

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, **Luiz Monegatto** in the capacity of **Director of SSAB Swedish Steel Ltd.**, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

I have the authority to bind SSAB Swedish Steel Ltd.



Luiz Monegatto, SSAB Swedish Steel Ltd.

USR002691

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email=luiz.monegatto@ssab.com  
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Date

**SSAB SWEDISH STEEL LTD./ACIERS SSAB SUEDOIS LTEE (the "Corporation")**

**WRITTEN CONSENT OF THE DIRECTORS**

The undersigned, being the director of SSAB Swedish Steel Ltd. (the "Company"), hereby consents to and adopts the following resolutions as of the \_\_\_ day of November 2025.

**Approval of Annual Report**

RESOLVED that the Company's annual report to the Canadian government under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* is approved

The above resolution is hereby consented to.

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Luiz Monegatto

DocuSigned by:  
  
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Per Elfgrén

Signed by:  
  
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Christian LeBlanc



English

## Part 2

# Annual Report

In order to protect privacy, entities must not provide personal information of any kind in the open text box fields of this questionnaire.

Public Safety Canada recognizes that some aspects of the online questionnaire may limit an entity's ability to elaborate on complex information or provide detailed responses. Entities are encouraged to respond to the best of their ability and provide further clarification and detail in the annual report, as necessary.

Information provided in response to **Part 2: Annual Report** should reflect the activities of all entities covered by the report submitted at the end of the questionnaire.

**\*Which of the following accurately describes the entity's structure?**

Corporation	<input checked="" type="checkbox"/>
Trust	<input type="checkbox"/>
Partnership	<input type="checkbox"/>
Other unincorporated organization	<input type="checkbox"/>

**\*Which of the following accurately describes the entity's activities? Select all that apply.**

Note: If an organization is not involved in any of the following activities, then it may not be required to report under the Supply Chains Act, even if it meets the definition of **entity**. Entities that do not engage in these activities but wish to submit a report in the interest of transparency may do so by selecting 'Other' below and further describing their activities in the PDF report.

Producing goods (includes manufacturing, extracting, growing and processing) in Canada	<input checked="" type="checkbox"/>
Producing goods (includes manufacturing, extracting, growing and processing) outside Canada	<input checked="" type="checkbox"/>

Importing into Canada goods produced outside Canada

Controlling an entity engaged in producing goods in Canada

Controlling an entity engaged in producing goods outside Canada

Controlling an entity engaged in importing into Canada goods produced outside Canada

Other

**\*What steps has the entity taken in its previous financial year to prevent and reduce the risk that forced labour or child labour 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? Select all that apply.**

Mapping activities

Mapping supply chains

Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

Developing and implementing an action plan for addressing forced labour and/or child labour

Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily

Addressing practices in the organization's activities and supply chains that may cause or contribute to the risk of forced labour and/or child labour

Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains

Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour

Requiring suppliers to have policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains

Developing and implementing child protection policies and processes

Developing and implementing anti-forced labour and/or -child labour contractual clauses

Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists

Auditing suppliers

Monitoring suppliers

Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour

Developing and implementing grievance mechanisms to address complaints in the workplace

Developing and implementing training and awareness materials on forced labour and/or child labour

Developing and implementing procedures to track effectiveness in addressing forced labour and/or child labour

Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour

Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks

Information not available for this reporting period

**Please provide additional information describing the steps taken (if applicable) (3,000 character limit).**

Please note that information entered could be identifying information. In order to protect privacy, entities must not provide personal information of any kind in the open text box fields of this questionnaire.

SSAB has developed a Code of Conduct and a supplier Code of Conduct. Suppliers are contractually required to operate within the bounds of the Code of Conduct that prohibits child labor and forced labor. SSAB tolerates neither child labor nor forced labor and is follows the UN compacts on those issues, which it incorporates into its Code of Conduct

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**\*Does the entity currently have policies and/or due diligence processes in place related to forced labour and/or child labour?**

Yes



No



**\*If yes, which elements of the policies and/or due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply.**

Embedding responsible business conduct into policies and management systems



Identifying and assessing potential and actual adverse impacts in operations, supply chains and business relationships



Ceasing, preventing or mitigating potential and actual adverse impacts



Tracking implementation and results



Communicating how impacts are addressed



Providing for or cooperating in remediation when appropriate



**\*Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

Note : Entities are being asked to indicate if they have considered the ways in which their activities and supply chains could potentially cause, contribute to, or be linked (directly or indirectly) to actual or potential forced labour or child labour. Identifying parts of an entity's activities and supply chains that carry a risk does not indicate that forced labour or child labour was or is actually being used.

Yes, we have identified parts of our activities and/or supply chains that carry a risk to the best of our knowledge and will continue to identify emerging risks.

Yes, we have started the process of identifying parts of our activities and / or supply chains that carry risks, but there are still gaps in our assessments.

No, we have not started the process of identifying parts of our activities and / or supply chains that carry risks of forced labour or child labour being used.

**\*If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.**

The sector or industry it operates in

The types of products it produces or imports

The locations of its activities, operations or factories

The types of products it sources

The raw materials or commodities used in its supply chains

Tier one (direct) suppliers

Tier two suppliers

Tier three suppliers

Suppliers further down the supply chain than tier three

The use of outsourced, contracted or subcontracted labour

The use of migrant labour

The use of forced labour

The use of child labour

None of the above

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**\*Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply.**

Agriculture, forestry, fishing and hunting

Mining, quarrying, and oil and gas extraction

Utilities

Construction

Manufacturing

Wholesale trade

Retail trade

Transportation and warehousing

Information and cultural industries

Finance and insurance

Real estate and rental and leasing

Professional, scientific and technical services

Management of companies and enterprises

Administrative and support, waste management and remediation services

Educational services

Health care and social assistance

Arts, entertainment and recreation

Accommodation and food services

Other services (except public administration)

Public administration

None of the above

Other, please specify:

**\*Mining, quarrying, and oil and gas extraction**

Oil and gas extraction

Mining and quarrying (except oil and gas)

Support activities for mining, and oil and gas extraction

## \*Manufacturing

Food manufacturing

Beverage and tobacco product manufacturing

Textile mills

Textile product mills

Apparel manufacturing

Leather and allied product manufacturing

Wood product manufacturing

Paper manufacturing

Printing and related support activities

Petroleum and coal product manufacturing

Chemical manufacturing

Plastics and rubber products manufacturing

Non-metallic mineral product manufacturing

Primary metal manufacturing

Fabricated metal product manufacturing

Machinery manufacturing

Computer and electronic product manufacturing

Electrical equipment, appliance and component manufacturing

Transportation equipment manufacturing

Furniture and related product manufacturing

Other manufacturing

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**Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the organization has taken to assess and manage that risk (if applicable) (3,000 character limit)**

Please note that information entered could be identifying information. In order to protect privacy, entities must not provide personal information of any kind in the open text box fields of this questionnaire.

SSAB runs major business operations. Thus, anything from office furniture to raw materials used to make SSAB's steel products carries a risk of forced labor. In order to combat this risk, SSAB supports and respects internationally established human rights and has taken several measures to mitigate the risk in its supply

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Chain. These measures include updating SSAB's supplier Code of Conduct to require all suppliers to forgoe the use of child and forced labor, conducting regular risk assessments and audits, doing regular due diligence on all business partners, and training SSAB's employees on SSAB's code of conduct

**\*Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

Yes



No



Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.



**\*If yes, which remediation measures has the organization taken? Select all that apply.**

Actions to support victims of forced labour or child labour and/or their families, such as workforce reintegration and psychosocial support

Compensation for victims of forced labour or child labour and/or their families

Actions to prevent forced labour or child labour and associated harms from reoccurring

Grievance mechanisms

Formal apologies

**\*Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains?**

Yes

No

Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

**\*Does the entity currently provide training to employees on forced labour and/or child labour?**

Yes

No

**\*If yes, is the training mandatory?**

Yes, the training is mandatory for all employees.



Yes, the training is mandatory for employees making contracting or purchasing decisions.



Yes, the training is mandatory for some employees.



No, the training is voluntary.



**\*Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?**

Yes



No



**\*If yes, what method does the entity use to assess its effectiveness? Select all that apply.**

Setting up a regular review or audit of the entity's policies and procedures related to forced labour and child labour

Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses

Partnering with an external organization to conduct an independent review or audit of the entity's actions

Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators

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