

# **Metal One America, Inc. Modern Slavery Statement**

## **May 2024 for the period of April 1, 2024 through March 31, 2025**

### **1 Introduction**

Metal One America, Inc., is committed to acting ethically and with integrity in all of our business dealings and relationships, and to promote compliance with applicable laws and protect the dignity and rights of all people connected to our business. We strive to work ever more closely with our suppliers to ensure their workforce, and the workforce of their supply chains are treated with respect and dignity. At the heart of our mission lies a commitment to fostering inclusive workplaces and sourcing products responsibly.

This is Metal One America, Inc.'s second report pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9). We recognize that stamping out modern slavery risks is a process that will take time. Our reporting outlines the measures we have in place and the efforts we have commenced to assess and address risks of modern slavery, including forced labour and child labour, in our business and supply chain.

### **2 Our organizational structure, business operations and supply chains**

Metal One America, Inc. is an importer/ wholesale distributor in the steel sector. Metal One America, Inc. has business operations in the USA and employs about 100 people in the USA. Metal One America's activities include the import of goods in Canada and the USA.

The goods used in the manufacture of our products, such as raw materials, are sourced from suppliers located in Japan, Taiwan, Australia, and other countries. We purchase steel coils, angles and channels for construction, and bearing rings to resell in the Canadian market from suppliers located in the USA, Japan, and China among other countries.

To learn more about our business, please visit <https://www.metaloneamerica.com/>.

### **3 Our supply chain risk profile**

Within our operations, we have assessed our risk profile based on sector and industry risks as medium low. All of our workers are employed in the USA, and we have fair and responsible employment practices in place to protect and promote workers' rights.

That said, we recognise that risks of modern slavery may be present in our supply chain, mainly due to the location of certain manufacturers and the difficulty in identifying all raw material suppliers (i.e. Tier 2 or 3 suppliers). Since a majority of such workers are not employed directly by Metal One America, Inc., we have less control and visibility over their working conditions and employment terms and we continue to tailor our risk management actions to address those risks. Namely, we continue our efforts to classify supplier risks and map key parts of our supply chain to identify and improve our understanding of modern slavery risks.

Our key operations and supply chains include:

Business operations	Supply chains	Modern Slavery Red Flags
High Risk Country bearing ring suppliers	Bearing rings for automotive and other uses. Steel sourced from Asia- Pacific.	Country risk
Other bearing ring/ race suppliers	Manufactured in Mexico and Japan. All steel is produced in Asia-Pacific before being further manufactured into bearing rings/ races.	Low risk
High Risk Country Oil Country Tubular Goods (OCTG) Suppliers	OCTG pipe/ tubing and couplings made in a high risk country. Raw materials are sourced from Asia-Pacific and other unknown sources.	Country Risk, raw material industry risk
Other OCTG Suppliers	OCTG pipe/ tubing and couplings made in Asia-Pacific from Asian-Pacific steel slabs	Low Risk
Flat rolled steel coil suppliers	Flat rolled coils for various end use. Steel slab sourced from Asia-Pacific and Europe.	Low risk
Steel Wire and Wire rod suppliers	This steel is produced in Asia-Pacific	Low risk

#### 4 Actions taken to combat modern slavery risks

As can be seen in section 3 above, Metal One America, Inc. anticipates that its sourcing in certain Asia-Pacific countries and unknown sourcing of raw materials deeper in the supply chain are susceptible to risks of modern slavery.

Metal One America, Inc. assesses and manages those risks by maintaining consistent and high standards of due diligence and risk mitigation processes to monitor for and avoid modern slavery in all environments in which Metal One America, Inc. sources from, including developing and implementing those policies, processes and actions discussed in sections 5 to 8 below.

Such processes and actions include, but are not limited to, the following:

- (a) Metal One America, Inc has a Forced Labor policy and a Supplier Code of Conduct for internal compliance and for our supplier's commitment to compliance.
- (b) Metal One America, Inc. provides training to all employees who handle international transactions/ imports to raise awareness of this issue within the organization.
- (c) Metal One America, Inc. conducts regular supplier reviews every other year for low-risk suppliers, and annually for high-risk suppliers.

#### 5 Our Policies on Modern Slavery

Our Statement on Forced Labor reflects our commitment to acting ethically and with integrity in all our business relationships and to enforcing effective systems and controls to prevent modern slavery from taking place in our business and supply chain. A copy of our Statement on Forced Labor can be found on our website at: <https://www.metaloneamerica.com/about/esg/>.

As part of Metal One America, Inc.'s employee handbook, provisions requiring adherence to respecting human rights and avoiding human rights violations are included in our Code of Conduct that all employees must read and follow.

Metal One America, Inc. makes sure its suppliers are aware of its policies and adhere to the same high standards. Our Supplier Code of Conduct sets forth our expectations towards all suppliers of goods and services to Metal One America, Inc. with respect to human rights and ethical business practices. A copy of our Supplier Code of Conduct can be found on our website at: <https://www.metaloneamerica.com/about/esg/>.

## **6 Due Diligence Processes**

In order to identify and manage risks of modern slavery in our own business, we carry out background checks and periodically reassess our employment practices to ensure we meet or surpass employment standards in all jurisdictions in which we operate.

We periodically review and improve our approach to supplier due diligence with the aim of ensuring a more robust action plan to address modern slavery risks.

Most suppliers have been asked to complete a comprehensive supplier-due diligence questionnaire and any remaining suppliers will be asked to do the same during the course of the next reporting period. As we receive responses from our suppliers, we reserve the right to undertake additional verifications and audits.

As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we have adopted the following due diligence procedures:

- (a) We send comprehensive due diligence questionnaires to all existing steel suppliers on a risk-based approach. For all new steel suppliers, send a comprehensive due diligence questionnaire before placing orders.
- (b) We use a supply chain mapping vendor to look for hidden risk in our supply chain and verify information from the questionnaire.
- (c) For any high-risk suppliers, will use an external third party to review for any modern slavery risk.

## **7 Supplier Adherence to our values**

Metal One America, Inc. seeks to do business with suppliers that have similar values, ethics and moral business practices, including those related to human rights. Metal One America, Inc. will not tolerate any form of modern slavery and human trafficking within its supply chain.

We have included anti-modern slavery representations, warranties and covenants in our standard terms and conditions which are used with our suppliers and ensure that such provisions are included in all contracts as appropriate.

To ensure all suppliers and contractors in our supply chain comply with our values, we ask our suppliers to conform to our Supplier Code of Conduct and will not trade with any who does not demonstrate compliance.

## **8 Training**

In order to further develop the above-mentioned policies, we are including information regarding modern slavery risks in our employee onboarding materials. Taking a risk-based approach, we have developed basic training on modern slavery and are also in the process of developing annual training for all staff who handle international transactions/ imports on how to detect and report human trafficking and all forms of modern slavery risks.

We invest in educating our staff to recognize the risks of modern slavery and human trafficking in our business and supply chains. Through our training programs, employees are encouraged to identify and report any potential breaches of Metal One America, Inc.'s Code of Conduct. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains. Examples of training courses we have administered over the past year include:

- a. Initial basic training on what Forced Labor is, what Metal One America, Inc.'s policy is on forced labor, and where risks are in the supply chain. This training was conducted for new employees that handle international transactions within 30 days of starting.
- b. Annual training was conducted in various sessions over the year in order to refresh information previously provided, advise on updates/ changes to regulations and internal policies, and clarify any questions that may have come up as the policy was rolled out.

## **9 Remediation Measures**

Over the course of the reporting period, we have not identified any instances of modern slavery or human trafficking in our business and supply chains, therefore, we have not been required to take remedial measures.

## **10 Remediation measures relating to loss of income to vulnerable persons**

We recognize that instances of modern slavery and human trafficking often impact the human rights of particularly vulnerable groups, such as migrant laborers, unskilled laborers, indigenous people, women, or children. Over the course of the reporting period, we have not discovered instances of modern slavery in our business and supply chain, therefore, we have not been required to take measures to remediate the would-be loss of income to vulnerable families.

## **11 Effectiveness in combatting modern slavery risks**

To date, Metal One America, Inc. has not taken some actions to assess the effectiveness of our actions in preventing and reducing risks of modern slavery in our activities and supply chain. We

have trained 59 staff that handle international transactions. We have reviewed over 30 of our Tier 1 suppliers for forced labor risk. There have been no discoveries of forced labor in the reviewed mills.

## 12 Approval of the report

This report is made in accordance with Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and constitutes Metal One America, Inc.'s modern slavery report for the financial year commencing on April 1, 2024 and ending on March 31, 2025.

This report was approved by the Board of Directors of Metal One America, Inc. pursuant to Paragraph 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* on March 27, 2025.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signed

By:  \_\_\_\_\_

Scott Wilson

EVP/CFO

Date: 03/28/2025

I have the authority to bind Metal One America, Inc.