

## ARCELORMITTAL TAILORED BLANKS AMERICAS LIMITED

### Fighting Against Forced Labour and Child Labour in Supply Chains Act

ArcelorMittal Tailored Blanks Americas Limited ("AMTB Canada") recognizes that forced and child labour are significant challenges in global supply chains. It acknowledges its responsibility to address these issues. This report, accordingly, outlines the measures that AMTB Canada has taken to fight forced and child labor within its supply chains.

This report is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023, c 9 (the "Act") for the reporting year 2024 and sets out the steps that AMTB Canada has taken to prevent and/or reduce the risk that forced or child labour is used in its business.

### General Policies and Approach to Forced and Child Labour

AMTB Canada is a part of the ArcelorMittal group of companies ("ArcelorMittal Group") and remains committed to taking meaningful action to prevent the use of forced or child labour within its business and supply. This statement builds upon the measures outlined in the 2023 report of AMTB Canada and provides updates on improvements implemented during 2024.

The approach to preventing forced and child labour in its activities and supply chains remains grounded in the ArcelorMittal Human Rights Policy (which is derived from various International Human Rights Declarations including the United Nations Declaration of Human Rights) and various ArcelorMittal Group policy documents (the "Policy Framework") which are structured to ensure that the ArcelorMittal Group operates with the highest level of integrity and in compliance with applicable laws. Through the Policy Framework, the ArcelorMittal Group asks its suppliers to have effective management systems in place to achieve the environmental and governance objectives to which it is committed. It also seeks to influence its suppliers to work together to identify further opportunities to improve responsible business practices along the supply chain and develop ongoing performance improvements to the Policy Framework.

The following are the main policies of the Policy Framework setting out the general approach to the risks of forced and child labour:

**Code of Business Conduct** <https://corporate.arcelormittal.com/investors/corporate-governance/compliance-and-policies>

As part of its ongoing commitment to ethical conduct and regulatory compliance, the ArcelorMittal Group updated its Code of Business Conduct in 2024 to strengthen its compliance framework and reinforce its approach to responsible business practices. Key updates include a stronger emphasis on environmental, social, and governance (ESG) standards, and the introduction of guiding principles of behaviour that reflect its core values. The Code of Business Conduct continues to articulate the fundamental legal and ethical principles that guide conduct

and prohibits the use of forced or child labour. It also sets out commitments to a work environment free of harassment and discrimination, promoting occupational health and safety, and respecting the environment.

**Human Rights Policy** <https://corporate.arcelormittal.com/investors/corporate-governance/compliance-and-policies>

The Human Rights Policy articulates a commitment and respect for all human rights in line with the United Nations Guiding Principles on Business and Human Rights. This policy affirms the opposition to the use of forced labour, child labour, human trafficking, and all forms of human rights violations known as "forced labour" within operations and the supply chain.

### **Code for Responsible Sourcing**

The Code for Responsible Sourcing ("Code") sets out expectations of the supply chain in relation to human rights, labour, health and safety, the environment and anti-corruption. This includes ensuring that all work is freely chosen and without the use of forced or child labour. The Code is supplemented by a guidance document for buyers and suppliers which details specific expectations in relation to forced and child labour. The Code for Responsible Sourcing supports [10 Sustainable Development Outcomes](#) which are aligned with UN Sustainable Development Goals.

## **AMTB Canada - Structure, Activities and Supply Chains**

### **Structure**

AMTB Canada is a federal corporation incorporated on March 8, 1976. It employs approximately 232 employees at its two manufacturing plants in the Province of Ontario. The Concord, Ontario plant serves as its operating head office, and is situated in the north of the Greater Toronto Area. The Woodstock, Ontario facility, on the other hand, is a center of excellence for components that underpin the Battery-Electric-Vehicle supply chain in Ontario.

### **Activities**

AMTB Canada produces automotive components in the form of laser welded blanks that provide weight saving solutions, coupled with enhanced safety performance to automotive Original Equipment Manufacturers across North America. A patented ablation technology allows for weld solutions that bring various steel gauges together to produce automotive components such as Door Rings, B-Pillars and A-Pillars. Its primary manufacturing input is steel coils which are supplied by steel mills in the US and Canada.

### **Supply Chain**

The supply chain of AMTB Canada generally includes the sourcing of steel coils as raw materials. The raw material suppliers are, for the most part, located in the US and Canada. The procurement

of goods and services at AMTB Canada is led by its Purchasing Department with support from legal and finance professionals.

## **Steps Taken to Prevent and Reduce Risks**

### **Risk Assessment and Mitigation**

AMTB Canada continues to complete regular risk assessments that consider human rights issues as part of its general local risk assessments. The Code includes explicit references and targets relating to its, and other, industry initiatives and standards. AMTB Canada selectively engages with its suppliers and focuses its attention on those parts of the supply chain where the risk of violation of its policies is the highest.

### **Supply Chain Evaluation**

Suppliers are subject to due diligence processes and the Code, the Code of Business Conduct, and the Human Rights Policy as part of a supplier registration process. In 2024, AMTB Canada continued to use third-party due diligence solutions as one way to evaluate new and existing suppliers. Specifically, AMTB Canada implemented the following enhancements to its due diligence program:

1. Adoption of a risk-based screening tool that evaluates suppliers against global sanctions lists, adverse media reports, and ESG risk indicators
2. Implementation of a quarterly supplier risk assessment program for high-volume suppliers
3. Engagement of an auditor to conduct onsite assessments of selected tier-one suppliers

### **Contractual Requirements**

The general contracting terms of AMTB Canada include representations and agreements from suppliers to comply with key policies within the Policy Framework. This requirement subjects suppliers to termination if these policies are violated.

### **Forced Labour and Child Labour Risks**

AMTB Canada recognizes that the jurisdictions from which goods and services are sourced could potentially be directly or indirectly linked to actual or potential risk of forced or child labour. Such risks are the focus of the Policy Framework. It continues to assess its supply chain and potential risk of exposure through its indirect relationships with raw material and equipment suppliers, whilst aiming to engage with globally recognized and reputable organizations. As such, the level of risk remains low as it relates to its goods and service suppliers.

### **Remediation Measures**

The ArcelorMittal Group continues to operate a confidential and anonymous whistleblowing facility on its website in accordance with its [Whistleblower Policy](#) through which stakeholders may report ethical concerns. AMTB Canada, along with the ArcelorMittal Group global assurance team, monitors the volume, type and response to such concerns.

Since the publication of its 2023 report, the reporting system was enhanced to improve accessibility and response times. Key improvements include:

1. Expansion of the whistleblower hotline to include additional language options
2. Reduction in response time standards from 72 hours to 48 hours for initial acknowledgment
3. Implementation of a case management system that tracks remediation actions from inception to resolution
4. Training of dedicated personnel to handle human rights-related complaints

The ArcelorMittal Group also operates a community grievance procedure to provide all employees and stakeholders with a more accessible and predictable process for raising and investigating concerns. This updated procedure may be used to submit complaints related to human rights abuses or concerns, harassment, discrimination, environmental violations, or any breaches of internal policies or laws. AMTB Canada is committed to ensuring that all grievances are addressed in a timely, fair, and transparent manner.

### **Training Provided to Employees**

All AMTB Canada employees are required to be trained and to refresh their training on the Code of Business Conduct every three years. In 2024, a majority of employees completed their required training on schedule. Managers and above, and those in relevant roles, also undertake specific human rights training which is also refreshed every three years. In addition to the mandatory training, the Policy Framework is communicated to employees through various channels, including email communications, compliance videos, local targeted trainings and initiatives.

### **Assessing Effectiveness**

AMTB Canada conducts Human Rights Risk assessments that looks at the risk of the use of child labour and forced labour at its worksites. It also conducts an overall Compliance Risk Assessment to identify top compliance related risks, including corruption, human rights, forced labour and child labour risks. The results of these assessments inform strategic priorities and program enhancements for the coming year.

AMTB Canada recognizes the challenges inherent in addressing forced and child labor but remains optimistic about the opportunities for progress. It is committed to adapting and evolving its strategies accordingly.

## Approval and Attestation

This report was approved by the Board of Directors of ArcelorMittal Tailored Blanks Americas Limited on May 28, 2025.

In accordance with subsection 11(4) and subsection 11(5) of the *Fighting Against Forced Labour and Child Labour in Supply Chains*, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



---

Todd Baker  
President and CEO