

<b>MAKSTEEL</b>	Company Report	Approved by	President
	<b>Steps Taken to Reduce Forced Labour and Child Labour</b>	Review Date	March 2026

This report has been prepared by Maksteel Holdings ULC to address the organization's steps taken to prevent and reduce the risk of forced labour and child labour in company activities or supply chains.

**(a) – Structure, activities and supply chains**

**Maksteel Holdings ULC (Maksteel)** is an Unlimited Liability Company, operating with an average of 150 employees in the provinces of Ontario and Quebec in Canada.

Maksteel's production facility is located in Mississauga, Ontario. Maksteel's primary purpose is to process, package, and deliver quality sheet and coiled steel to all manufacturers of metal products, on time, to the satisfaction of our customers, through the use of our versatile slitters, and our handling and delivery capabilities. A sales office in Montreal, Quebec supports the customer base in the area.

Maksteel's primary supply chain includes domestic suppliers of raw steel coil. Many of its other suppliers are also Canadian producers or distributors of raw materials, hardware, equipment, and supplies. The supply chain is concentrated in Canada and the United States.

**(b) – Policies and due diligence processes**

The Company has policies and procedures in place to ensure that business is conducted in an ethical and legal manner. These responsibilities are embedded in the Company Mission Statement – the basis for all activity. Employee orientation and ongoing training take place for both initial awareness and ongoing compliance of expectations for conduct.

Maksteel has created a *Supplier Code of Conduct* to address forced labour and child labour in the supply chain. These will be reviewed by the leadership team and signed off by the president.

To identify and respond to adverse impacts, Maksteel has taken action to prevent and reduce risks in business operations and supply chains. These include responsible purchasing and human resource practices, and a confidential and anonymous reporting system.

*Human Resources Practices*

During Maksteel's new employee orientation sessions, individuals are educated on their rights as employees. This includes reviewing and issuing the Employment Standards in Ontario summary poster, outlining minimum standards for hours of work and overtime. Individuals are advised that employers are prohibited from penalizing employees in any way for exercising their rights under the Act, and they are provided with the information on where to access support for legislative questions and reporting of violations.

The Workplace Violence Prevention Policy is posted prominently on notice boards and it is reviewed as required by law. The policy covers worker rights, security measures, reporting procedures, investigation, enforcement, and training.

*Supply Chain Management*

Maksteel has a history of fostering long-term relationships with reputable organizations having similar codes of conduct and governance practices.

- Maksteel has a zero tolerance policy regarding the use of forced labour and child labour and will not do business with any supplier that engages in these practices.
- Supplier terms and conditions include signing off on, and adherence to the *Maksteel Supplier Code of Conduct*.

**(c) - Forced labour and child labour risks**

Maksteel aims to do business with globally recognized and reputable organizations. The Company will endeavour to continually assess the level of risk in the supply chain.

### *Internal Risks*

Maksteel considers the risks of forced labour and child labour within its organization to be low. The workplace policies and employee screening support this. The company does not hire individuals under the legal age, and ensures that individuals are legally entitled to work in the country as part of the onboarding process.

### *Supply Chain Risks*

The Company's main product is steel. The sources for the raw material processed are primarily based in North America, specifically Canada. This area has a low prevalence of forced and child labour. Despite this, the Company will require a supplier to sign off on the terms of the Supplier Code of Conduct to ensure risk is minimized throughout the supply chain. The Company also periodically reviews the websites of suppliers of raw steel for social compliance statements and commitments to prohibit forced labour and child labour in their own activities and throughout their supply chain.

#### **(d) - Remediation measures**

As of the date of this report, the Company is not aware of forced labour or child labour being used in supply chain activities. As a result, no steps have been required to remediate forced or child labour.

#### **(e) – Remediation of loss of income**

As of the date of this report, Maksteel is not aware of forced labour or child labour in its own activities or in activities throughout the supply chain. As a result, no measures have been required to remediate the loss of income of vulnerable families.

#### **(f) – Training**

Every new employee is provided with orientation on the company's policies and procedures. This includes a review of Maksteel's Mission Statement and codes of conduct. The Mission Statement covers the expectation that all activity is conducted in an ethical and legal manner. Employees sign off that they have participated in the orientation training. The orientation material is reviewed periodically to reflect changing requirements.

The leadership team, including those responsible for purchasing, participates in regular meetings. As needed, information on all policies and programs are discussed to ensure compliance with Company expectations and adherence to legislation, including forced and child labour regulations.

#### **(g) – Assessing effectiveness**

Maksteel will monitor the actions already in place and assess the effectiveness through management review. This will be done at least annually, and also as the need arises.

Those responsible for procurement will take an active approach when assessing new suppliers.

### **Approval and Attestation**

This report was reviewed and approved by the leadership team and specifically the President of Maksteel Holdings, ULC, pursuant to Section 11 of the Act.



Steve Roberts, President

I have the authority to bind Maksteel Holdings, ULC

03/06/2026  
Date