

# ARCELORMITTAL CANADA HOLDINGS INC.

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

This statement is made by ArcelorMittal Canada Holdings Inc. (“**AM Holdings**”), a subsidiary of ArcelorMittal S.A., on behalf of itself and its subsidiaries ArcelorMittal Canada Inc., ArcelorMittal Dofasco G.P. and ArcelorMittal Coteau-du-Lac Limited Partnership. (collectively the “**Subsidiaries**” and together with AM Holdings, the “**Company**”) pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “**Act**”) for the reporting year 2023 and sets out the steps it has taken to prevent and reduce the risk that forced or child labour is used at any step of the production of goods in Canada or elsewhere or of goods imported into Canada by the Company. As part of the ArcelorMittal group of companies (“**ArcelorMittal Group**”), the Company is committed to preventing acts of forced labour and child labour within its business and supply chain and expects the same from its suppliers and partners.

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

Our approach to preventing forced and child labour in our activities and supply chains is set out primarily 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 is structured to ensure 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, social, and governance objectives to which the Company is committed. The Company 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 Company’s general approach to the risks of forced and child labour:

**Code of Business Conduct:** Articulates the fundamental legal and ethical principles that guide the Company’s conduct and prohibits the use of forced or child labour. It also sets out the Company’s commitments to a work environment free of harassment and discrimination, promoting occupational health and safety and respecting the environment.

**Human Rights Policy:** Articulates the Company’s commitment and respect for all human rights in line with the United Nations Guiding Principles on Business and Human Rights. This policy affirms that the Company is opposed to the use of forced labour, child labour, human trafficking and all forms of human rights violations known as “forced labour”, within the Company’s operations and supply chain.

**Code for Responsible Sourcing (the “Code”):** Articulates the expectations the Company has of its supply chain in relation to human rights, labour, health and safety, the environment and anti-corruption, which 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 the ArcelorMittal Group’s buyers and suppliers that details specific expectations in relation to forced and child labour. The Code supports the ArcelorMittal [10 Sustainable Development Outcomes](#) which are aligned with the UN Sustainable Development Goals.

## **ARCELORMITTAL CANADA HOLDINGS INC.**

AM Holdings is a federal corporation and does not produce goods in Canada or elsewhere nor does it import goods produced outside of Canada. AM Holdings controls the Subsidiaries that engage in these activities as highlighted in the following entity specific sections.

## **ARCELORMITTAL CANADA INC.**

ArcelorMittal Canada Inc. is a federal corporation and does not produce goods in Canada or elsewhere nor does it import goods produced outside of Canada. ArcelorMittal Canada Inc. is a subsidiary of AM Holdings and is a direct controlling entity of ArcelorMittal Dofasco G.P. and ArcelorMittal Coteau-Du-Lac Limited Partnership that engage in these activities as highlighted in the following specific sections.

## **ARCELORMITTAL DOFASCO G.P. AND ARCELORMITTAL COTEAU-DU-LAC LIMITED PARTNERSHIP**

### **Structure, Activities and Supply Chains**

#### ***Structure***

ArcelorMittal Dofasco G.P. (“**ArcelorMittal Dofasco**”) is an Ontario general partnership with operations in Ontario, Quebec and Alberta (for purposes of the Act, ArcelorMittal Dofasco controls the operations of ArcelorMittal Coteau-du-Lac Limited Partnership, a Quebec limited partnership with operations in Quebec, and is reporting on its behalf and collectively as “Dofasco”). Dofasco was founded in 1912 and employs nearly 5,000 employees. Dofasco is a subsidiary of both AM Holdings and ArcelorMittal Canada Inc.

#### ***Activities***

Dofasco produces approximately 4.5 million net tons of high-quality flat carbon steel through its manufacturing facilities located in Ontario and Quebec. Dofasco’s steel is mainly sold into the North American market.

#### ***Supply Chain***

Dofasco’s supply chain generally includes the sourcing of a variety of raw materials, equipment and specialized services. The main direct raw material and equipment suppliers are principally located in North America (Canada, USA, Mexico, and Costa Rica), South America (Brazil, Bolivia, Chile, Peru) Asia, (China, Japan, South Korea, India, Kazakhstan, Malaysia, Singapore, Thailand, Turkey, and Taiwan) and Europe (Austria, Belgium, Bulgaria, Switzerland, Czech Republic, Germany, Denmark, France, Finland, United Kingdom, Italy, Luxembourg, Netherlands, Poland, Spain and Sweden). The main service providers are located predominantly in North America (Canada, USA and Mexico). The procurement of goods and services at Dofasco is led by procurement teams with support from legal and tax professionals.

## Steps Taken to Prevent and Reduce Risks

### ***Risk Assessment and Mitigation***

Dofasco completes an annual risk assessment that considers human rights issues as part of its general local risk assessments. The Code includes explicit references and targets relating to our commitment to ResponsibleSteel™ and other industry initiatives and standards. We prioritize our approach to selectively engage with our suppliers and focus attention on those parts of the supply chain where the risk of violation of our policies is the highest.

### ***Supply Chain Evaluation***

Suppliers are subject to due diligence processes and contractually subject to the Code, Code of Business Conduct and Human Rights Policy as part of our supplier registration process. Dofasco also uses third party due diligence software as one way to evaluate new and existing suppliers.

### ***Contractual Requirements***

Dofasco's general contracting terms include representations and covenants from the supplier to comply with key policies within the Policy Framework. This requirement subjects the supplier to termination if these policies are violated.

## Forced Labour and Child Labour Risks

Dofasco recognizes that the jurisdictions in which it sources its goods and services could potentially be directly or indirectly linked to actual or potential risk of forced or child labour and such risks are the focus of the Policy Framework. We have assessed our supply chain and there is a potential risk of exposure through our indirect relationships with our raw material and equipment suppliers, although Dofasco does aim to engage with globally recognized and reputable organizations. Based on Dofasco's annual Human Rights risk assessment, the level of risk is low as it relates to our service suppliers.

## Remediation Measures

The ArcelorMittal Group operates a confidential and anonymous whistleblowing facility on its website, in accordance with its [Whistleblower Policy](#) through which stakeholders may report ethical concerns. Dofasco, along with our global assurance team, monitors the volume, type and response to such concerns. Dofasco also operates a community grievance program on its website which encourages its community members to notify Dofasco of any material environmental or ethical concerns.

No further measures have been taken to remediate forced labour or child labour in Dofasco's activities and supply chains.

## Remediation of Loss of Income

No measures have been taken to remediate loss of income in Dofasco's activities and supply chains.

## Training

All employees are required to be trained and to refresh their training on the Code of Business Conduct every three years. 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, and local targeted trainings and initiatives.

## Assessing effectiveness

Dofasco conducts an annual Human Rights risk assessment as part of our ResponsibleSteel™ certification that looks at the risk of the use of child labour and forced labour on our worksite. We also conduct an overall compliance risk assessment to identify Dofasco's top compliance related risks, including corruption, human rights, forced labour and child labour risks.

## Approval and Attestation

This report is approved and attested, as required under subsection 11(4) and subsection 11(5) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.



---

*I have the authority to bind ArcelorMittal Canada Holdings Inc.*

Full name: Ronald Bedard

Title: Director, President and Chief Executive Officer

Date: May 30, 2024