

Slavery and Human Trafficking Disclosure

As a manufacturer doing business in California with worldwide gross receipts that exceed \$100, Canam Steel Corporation (collectively with its subsidiaries and affiliates, “Canam”) is subject to The California Transparency in Supply Chains Act of 2010 (Cal. Civ. Code § 1714.43 and Cal. Rev. & Tax. Code § 19547.5) (the “Act”). The Act requires Canam to disclose its efforts to eradicate slavery and human trafficking from their direct supply chains for tangible goods offered for sale:

- **Verification.** Canam recognizes the importance of assuring that major suppliers engage in appropriate behavior. Canam has adopted a Code of Ethics that includes a commitment to adherence to all applicable laws and regulations. Canam conducts internal audits, including review of the activities of its Purchasing Group and verification that the Purchasing Group adheres to the Code of Ethics. Canam intends to implement through the Purchasing Group annual verification procedures for its major suppliers. Canam does not engage a third party to verify and evaluate its product supply chains for risks of human trafficking and slavery.
- **Audit.** As noted above, Canam does not currently conduct audits of suppliers to evaluate supplier compliance with company standards against trafficking and slavery in supply chains. Canam does intend to implement procedures to help assure compliance by major suppliers with Canam’s values and purchasing guidelines.
- **Compliance.** Canam does not currently require direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.
- **Accountability.** Upon hire, Canam requires all office employees to read and acknowledge receipt and understanding of Canam’s Code of Ethics, a copy of which is available on the Canam website. Employees are required to re-certify this acknowledgement annually. The Code of Ethics includes, among other things, certification that the employee will comply with all applicable laws and regulations. Human trafficking and slavery is a violation of such laws, and would constitute a violation of the Code of Ethics. Such a violation could result in disciplinary action against the employee.
- **Training.** As noted above, Canam explains the Code of Ethics to employees, and makes sure they understand their obligations to comply with all laws, including all dealings with suppliers.