



MANA
Max Aicher North America

Forced Labour and Child Labour Report for MANA

This report ("**Report**") is made in compliance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") by Max Aicher (North America) Limited. ("**MANA**" or "**we**").

This report has been prepared for the calendar year ended December 31, 2023.

MANA's board of directors, as the principal governing body, approved the report pursuant to section 11(5) of the *Act* on May 30th, 2024.

Who We Are: Activities and Structure

MANA supplies hot rolled steel bar products to the North American marketplace and is a global leading bar supplier. The majority of our sales are destined to Canadian purchasers, with the remainder shipped to the United States. We supply rebar to the construction industry and we supply alloy and non-alloy round steel coil and bars to the automotive and commercial vehicle industry, to the oil industry, to wind tower projects and to chain producers and agriculture technology, among others. We also supply thread bar systems for a variety of technical engineering purposes, including thread bar anchors for mining and tunnelling, reinforcement connections, form ties, tie rods, soil nails, micropiles and rock and soil anchors for geotechnical applications.

MANA has 130 employees, and we run two shifts at our steel production facility in Hamilton, Ontario. We are one of Hamilton's top growing businesses. Our operations are certified to ISO 9001:2015 Quality Standards and IATF 16949:2016 Automotive Management.

We have established a reputation of excellence and a commitment to continuous improvement that has allowed us to become one of the global leading bar suppliers in North America. Part of our commitment to improvement involves promoting integrity and ethical principles in all aspects of our business and building a strong corporate social responsibility foundation. MANA operates in accordance with international human rights, including by prohibiting forced labour and child labour of any kind.

Our Supply Chains

The vast majority of our sourcing is comprised of raw steel, of which 80 percent is procured from sources within North America. In 2023, the remaining 20 percent was sourced from Norway, though depending on the year we may source steel from other countries

internationally. The remainder of our inputs are sourced globally by our procurement team, and amount to less than 10 percent of our purchases. As a company with cross-border and international reach, we understand the risk of forced labour or child labour in supply chains and have policies and procedures to mitigate such risk.

Risks of Forced Labour and Child Labour in our Supply Chains

These risks of forced labour in our supply chains are largely mitigated by most of our inputs being procured in North America. Some risks nonetheless remain, and we aim to mitigate these risks through our internal policies and procedures.

MANA's reputation for upholding integrity in our operations is earned through our commitment to constant improvement. This includes improving our approach to human rights protections within our operations.

Our Policies, Due Diligence Processes, and Training

To mitigate risks throughout our global operations, all companies worldwide within the Max Aicher Group must comply with the Mandatory Principles and Guidelines ("**MPG**") and the General Code of Conduct ("**Code**"). The MPG applies to all Max Aicher branches and businesses, including MANA, and the Code applies specifically to all employees, including management. The Max Aicher Group and MANA is in the process of adopting a Code of Conduct: Vendor Policy ("**Vendor Policy**") with which suppliers to all branches of the company will have to comply. The Vendor Policy includes obligations to protect human rights, prohibitions against child and forced labour, and a requirement to communicate the principles and requirements of the Vendor Policy with suppliers' own subcontractors and subsuppliers.

Under the MPG, MANA is committed to respecting international human rights. We recognize core labour standards from the International Labour Organization, including: the prohibition of child labour, the prohibition of forced labour, the right of employees to freedom of association, and the treatment of all employees without discrimination.

Throughout all Max Aicher companies, we promote transparency and responsible management and control. This includes maintaining a dialogue-oriented approach to communicating with employees, customers, suppliers, and other stakeholders.

We base our activities on ethical principles such as integrity, probity, respect for human dignity, and non-discrimination. Through our policies, MANA is committed to complying with applicable laws in the countries where we operate and acting in accordance with ethical principles. We expect the same from our employees, partners, and suppliers. MANA is also committed to socially responsible management, meaning we consider the consequences of our business decisions from economic, technological, social, and ecological perspectives.

All Max Aicher companies contribute to the social and economic development of the regions in which we operate by creating and preserving jobs, protecting the health and safety of employees, and by providing ongoing training. We also maintain principles relating to environmental protection.

MANA expects our suppliers to comply with our MPG.

Though we do not currently have specific employee training on forced labour and child labour, we are committed under the Code to providing suitable training and/or information necessary to support employees in complying with the laws and legal system of the country in which they work.

How We Monitor Ourselves and Our Suppliers and Assess Effectiveness

MANA will reserve the right to request that all relevant information be disclosed where we suspect a supplier has violated any of the principles or requirements of our new Vendor Policy. If a supplier violates any principle or requirement of the policy, MANA reserves the right to terminate the relationship with the supplier.

How We Have Addressed Use of Forced Labour or Child Labour our in Supply Chains

As of December 31, 2023, MANA has not encountered situations of forced labour or child labour in our supply chains. We therefore have not had to remediate such situations.

Attestation

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 or entities 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.

Dipl. Ing. Max Aicher

Chairman of the Board



May 31; 2024

Signature

I have the authority to bind MANA.