

FORCED LABOUR IN CANADIAN SUPPLY CHAINS ANNUAL REPORT 2024

1. Identifying Information (subsection 11(3)(a))

Reporting Entity Legal Name:	AltaSteel Inc.
Financial Reporting Year:	January 1, 2024 – December 31, 2024
Revised Report:	No
Business Number:	749424875
Report Type:	Single
Other Jurisdictional Reporting Obligations:	No
Structure:	Corporation
Activities:	Manufacturing Steel Products in Canada
Sector/Industry:	Manufacturing
Location:	Edmonton, Alberta, Canada

2. Compliance with Reporting Requirements as per subsection 11 of Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act).

2.1 Steps taken during previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by AltaSteel (subsection 11(1)).

In the previous financial year, AltaSteel has maintained internal controls to ensure that all workers are recruited voluntarily and are a minimum of 18 years of age.

3. Compliance with Reporting Requirements as per subsection 11(3) of Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act).

AltaSteel manufactures quality steel products made from 100% recycled materials mainly sourced from Alberta and Saskatchewan. AltaSteel employs approximately 350 workers and operates in Edmonton Alberta.

AltaSteel produces steel billets from recycled metals and from the semi-finished billets produces rebar, flat bar, engineered bar, ball stock and grinding rod. We supply our products to the mining, construction, structural, agricultural, and oil & gas industries.

3.1 Policies and due diligence processes in relation to forced labour and child labour. (subsection 11(3) (b)).

AltaSteel's Forced Labour and Child Labour Prevention Policy has been developed and implemented.

3.2 Risk of forced labour or child labour being used and the steps it has taken to remediate any forced labour or child labour. (subsection 11(3) (c)).

AltaSteel imports raw materials from countries beyond North America, there is a low likelihood that the raw materials manufactured could use forced labour or child labour, however, to date, we have not identified forced labour or child labour risks in our activities or the activities of our supply chains.

3.3 Measures taken to remediate forced labour or child labour. (subsection 11(3) (d)).

AltaSteel continues to rely on labour laws in Canada to ensure we remain in compliance. AltaSteel has not identified any forced labour or child labour in our activities or the activities of our supply chains.

3.4 Measures taken to remediate the loss of income to the most vulnerable families that result from measures taken to eliminate the use of forced labour or child labour in our activities or supply chains. (subsection 11(3) (e)).

AltaSteel has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities or the activities in our supply chain.

3.5 Training (subsection 11(3) (f)).

AltaSteel has developed an internal training program specific to identifying forced labour and child labour and how to mitigate the risks and is providing training to required employees.



3.6 Assessing effectiveness in ensuring forced labour and child labour are not being used in our business or supply chains. (subsection 11(3) (g)).

AltaSteel's production facilities are in Alberta, and we will continue to comply with Alberta Employment Standards Code with respect to voluntary and non-child labour in the production of our products at our facilities.

Approval

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 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.

Amanda Reib

Full Name

VP HR & Administration

Title

May 28, 2025

Date



Signature – I have the authority to bind AltaSteel Inc.