

voestalpine High Performance Metals Ltd.

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This report (“**Report**”) is made in compliance with Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “**Act**”) by voestalpine High Performance Metals Limited, (“**vHPML**”), an Ontario limited liability company and, a subsidiary of voestalpine AG. (“**voestalpine**”).

vHPML, a Canadian entity operating in Mississauga, Ontario in the manufacturing and wholesale trade industry, has prepared this report for the fiscal year ending March 31, 2025.

Structure, activities and supply chains

voestalpine High Performance Metals Ltd. is a Canadian operation of voestalpine AG, a leading steel and technology group. Based in Linz Austria, voestalpine is a globally leading steel and technology group with a unique combination of materials and processing expertise. voestalpine, which operates globally, has around 500 Group companies and locations in more than 50 countries on five continents. It has been listed on the Vienna Stock Exchange since 1995.¹

The supply chain of vHPML is primarily comprised of flat-rolled and long-products in specialty steel grades produced and supplied by voestalpine group mills in Austria, Sweden and Brazil. A small volume of the supply chain includes mills in North America, Europe and Asia and steel distributors in Canada.

Policies and due diligence processes

The [Code of Conduct for Business Partners \(CoC-BP\)](#) and the voestalpine General Conditions of Purchase, which apply to all suppliers, set out a number of criteria for promoting sustainable sourcing and, in particular, ensuring human rights are respected. Any deviation from or failure to comply with internationally recognized frameworks, such as the UN Guiding Principles on Business and Human Rights or the ILO Declaration on Fundamental Principles and Rights at Work, can be reported using the established grievance process.

Due to increased legal requirements and the associated reporting obligations, voestalpine standardized its approach to the obligation to prove compliance with human rights and environmental standards for all purchasing activities in 2024 and set forth corresponding requirements in its Procurement Policy. Monitoring compliance with the above-mentioned international frameworks therefore also takes place on the basis of the Group’s Procurement Policy.

The current version of the CoC-BP was adopted by the Management Board of voestalpine at the end of the business year 2022/23. This Code defines voestalpine’s principles and requirements and is designed to ensure that the practices of business partners conform to both voestalpine’s values as well as the pertinent laws and regulations. Based on voestalpine’s [Human Rights Policy](#) and [General Code of Conduct](#), the CoC-BP addresses the following issues, with a particular focus on the concerns of value chain workers, which are outlined in the section entitled “Corporate Social Responsibility.”²

¹ [AG](#) and [HPMLtd](#) public sites

² [voestalpine Annual Report 2024/25](#) pg.299

Parts of business and supply chains at risk of forced labour or child labor

A country-specific risk analysis has shown that certain countries in voestalpine’s upstream value chain are at increased risk of human rights violations. In order to prevent human rights violations—including child labor and forced labor—in the upstream value chain to the greatest possible extent, above all in risk-prone regions, voestalpine relies on rigorous due diligence processes and mandatory compliance with its Code of Conduct for Business Partners.

In the past business year, voestalpine purchased its raw materials and input products such as ores, alloys, reducing agents, and other metals from around 40 countries. A comparison with the country specific risk analysis shows that this also includes countries such as Brazil, China, India, Mexico, Zambia, South Africa, Türkiye, Ukraine, Vietnam, and Zimbabwe. These countries present a high risk of human rights violations, child labor and pollution, among other risks.³

Actions

The country-specific risk assessment is carried out using public indices that encompass governance and sustainability. Two widely available sources are used by voestalpine to this end: the Worldwide Governance Indicators (source: World Bank) and the CSR Risk Check (source: MVO Nederland). A total of 213 countries and territories are covered by these indices. The combination of the two indices results in an overall risk assessment for each country and region. The following table shows the result of this risk assessment in the business year 2024/25. The data was based on all active suppliers in the business year. Internal value-added orders were not taken into account.⁴

| OUTCOME OF THE RISK ASSESSMENT 2024/25 | |
|--|-----------------------------------|
| | Percentage of total suppliers (%) |
| Vulnerable suppliers | |
| Suppliers from potentially at-risk product groups | 19.0 |
| Suppliers from potentially at-risk countries | 13.0 |
| Suppliers from potentially at-risk product groups in potentially at-risk countries | 3.0 |

On the basis of the initial risk assessment, voestalpine specifically requests additional evidence from business partners at risk to verify the extent to which they meet the requirements of the CoC-BP. This takes place in the form of a Supplier Assessment Questionnaire (SAQ). Tasks, responsibilities, strategies, management systems, and performance indicators (KPIs) related to the content of the CoC-BP are requested and reviewed by voestalpine. If required, voestalpine assists its business partners with implementing the requirements. Where necessary, training for suppliers or on-site visits are carried out in order to improve their understanding and ensure the implementation of effective improvement measures. The cooperation and participation of the business partners is required in this regard. voestalpine reserves

³ [voestalpine Annual Report 2024/25](#) pg.132

⁴ [voestalpine Annual Report 2024/25](#) pg.302

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the right to take appropriate action in the event of violations and an unwillingness to cooperate on the part of suppliers, which may ultimately lead to suspension or termination of the supply relationship.⁵

Remediation measures

Reports of human rights violations can always be submitted in person to direct managers, the local HR departments, Group Human Resources at voestalpine AG, as well as to the Management Board. Violations can also be reported to a Human Rights Officer (see below) or via voestalpine's online whistleblower system at <https://www.bkms-system.net/voestalpine>. The online whistleblower system allows reports to be submitted anonymously.⁶

Training

As part of its human rights due diligence obligations, voestalpine provides mandatory e-learning courses for employees and additional training for safety staff. The aim behind this is to raise awareness of human rights issues and identify potential risks at an early stage. Training is carried out by the respective Group companies and is supported by ongoing monitoring of participation rates and training volumes. It is aimed at all employees with access to e-learning courses and is available in 14 languages. The training program provides information and guidance on human rights compliance and includes three mandatory modules on the following topics:

- Module 1: *Fundamentals of Human Rights*
- Module 2: *Human Rights in Day-to-Day Work*
- Module 3: *Human Rights in the Supply Chain*

At the end of the business year 2024/25, 92% of the assigned human rights training courses had been successfully completed.⁷

⁵ [voestalpine Annual Report 2024/25](#) pg. 302

⁶ [HR Policy](#) pg. 4

⁷ [voestalpine Annual Report 2024/25](#) pg. 272

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Assessment

voestalpine has implemented governance processes to fulfill its due diligence obligations in order to identify, assess, and take appropriate actions regarding material actual and potential negative impacts of its business activities on people and the environment. This ongoing process extends across the entire value chain, including the company's own operations as well as upstream and downstream relationships with various stakeholder groups.

The due diligence governance processes comprise several successive steps:

1. Identifying and assessing material adverse impacts
2. Integrating impacts into the corporate strategy and operational processes
3. Implementing preventive and remedial actions
4. Monitoring and reporting⁸

Approval / 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 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. I have the authority to bind voestalpine High Performance Metals Limited.

Marco Siscaro
CEO North America
April 27, 2026

⁸ [voestalpine Annual Report 2024/25](#) pg. 107