

2024 ANNUAL REPORT

PURPOSE

This joint annual report for the 2024 fiscal year has been created by Zekelman Industries, Inc.; 1156676 Ontario Ltd.; Man of Steel Holdings Ltd; 6582125 Canada Inc; Atlas Tube Canada ULC; Atlas ABC Canada ULC; JMC Steel Capital LLC; Wheatland Tube, LLC; Atlas Tube (Arkansas) Inc.; Atlas Tube (Chicago), LLC; Atlas Tube (Plymouth), Inc.; Atlas Tube (Alabama), Inc.; Z-Modular, LLC; 1000924135 Ontario Inc., and Zekelman Industries Holding, Inc. (together, hereinafter referred to as, “**Zekelman**”) for the sole purpose of meeting their obligations and reporting requirements for entities pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9 (the “**Act**”). The content of this joint annual report is applicable to all Zekelman entities described herein, unless indicated otherwise.

OUR COMMITMENT

Zekelman is committed to preventing and reducing the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere, including goods that Zekelman imports into Canada.

STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Structure

Zekelman is the largest independent steel pipe and tube manufacturer in North America and a leading innovator in multi-family housing solutions.

1156676 Ontario Ltd. is a holding company and an Ontario limited corporation with a physical location in Ontario. Man of Steel Holdings Ltd is a holding company and an Ontario limited corporation with a physical location in Ontario. 1000924135 Ontario Inc. is a holding company and an Ontario limited corporation with a physical location in Ontario. Zekelman Industries Holding, Inc. is a holding company and a Delaware corporation with no physical location.

In the 2024 reporting year, 1156676 Ontario Ltd., Man of Steel Holdings Ltd, 1000924135 Ontario Inc.; and Zekelman Industries Holding, Inc. held a controlling interest in Zekelman Industries, Inc. (“**ZII**”), a Delaware corporation with a physical location in Chicago, Illinois, United States.

The following reporting entities are subsidiaries of ZII:

1. 6582125 Canada Inc: a holding company and an Ontario limited corporation with no physical location;
2. Atlas Tube Canada ULC: an Ontario unlimited liability corporation with a physical location in Ontario;
3. Atlas ABC Canada ULC: an Alberta unlimited liability corporation with a physical location in Ontario;
4. JMC Steel Capital LLC: a holding company and a Delaware limited liability company with no physical location;
5. Wheatland Tube, LLC: a Delaware limited liability company with physical locations in Illinois, Pennsylvania, Alabama, and Ohio, United States;
6. Atlas Tube (Arkansas) Inc.: a Delaware corporation with a physical location in Arkansas,

United States;

7. Atlas Tube (Chicago), LLC: a Delaware limited liability company with a physical location in Illinois, United States;
8. Atlas Tube (Plymouth), Inc.: a Michigan corporation with a physical location in Michigan, United States;
9. Atlas Tube (Alabama), Inc.: a Delaware corporation with a physical location in Alabama, United States; and
10. Z-Modular, LLC: a Delaware limited liability company with physical locations in Arizona, Texas, and Alabama, United States.

Activities

Zekelman is a distributor and producer of goods fabricated from steel in North America. It has Canadian distribution and production facilities in Ontario and Manitoba, along with United States distribution and production facilities in Illinois, Michigan, Arkansas, Texas, California, Pennsylvania, Alabama, Ohio, and Arizona. The core products being produced by Zekelman are steel pipes and tubes used in a variety of industrial and commercial applications and in the production of modular construction components used in the construction of commercial, institutional, and residential buildings. The Zekelman group of entities perform sales and distribution activities from their various offices, coordinated through the headquarters of ZII located in Chicago, Illinois, United States.

Supply Chain

Zekelman's global supply chain consists of suppliers providing steel for the manufacture of tubes, pipes, and modular units. The steel products are then distributed throughout North America, Europe, Australia, India, and Japan. Zekelman prides itself on the use of North American steel as the primary component in the manufacture of all finished materials, including buying steel from mills in the United States and Canada. The machinery used in the production process is sourced from Canada and the United States, where possible. However, some Zekelman machinery used in the production of goods is sourced from Europe and Japan. The sourcing of office materials is done locally in North America.

Steps Taken by Zekelman

To help prevent and reduce the potential risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada, Zekelman has taken the following steps:

1. Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily;
2. Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour;
3. Monitoring suppliers;
4. Maintaining policies and processes that help to mitigate the risk of forced labour or child labour within its own internal organization and in its supply chain; and
5. Developing and implementing grievance mechanisms.

POLICIES AND DUE DILIGENCE PROCESSES

In the 2024 reporting period, Zekelman maintained policies and due diligence processes to directly address child labour and forced labour, including:

1. Embedding responsible business conduct into policies and management systems;
2. Ceasing, preventing, or mitigating adverse impacts;
3. Tracking implementation and results;
4. Communicating how impacts are addressed; and
5. Providing for or cooperating in remediation when appropriate.

The above steps were addressed by Zekelman, including ZII and its subsidiaries, through the following actions:

1. Maintaining an Anti-Human Trafficking, Child & Forced Labour Policy which prohibits human-trafficking, child labour, and forced labour practices. It applies to all contractors, suppliers, affiliates, and personnel employed by or engaged to provide services to Zekelman, including, but not limited to, employees, officers, temporary employees, and independent contractors. The policy also includes a mechanism for the confidential reporting of any suspected violations.
2. Maintaining an Ethics Point hotline where employees can anonymously report suspected violations of Zekelman policies and applicable laws.
3. Tracking and reporting all complaints received (both locally and through Ethics Point).
4. Utilizing third-party agencies to complete age verification and background checks on employees.
5. Maintaining a Health & Safety Policy which strives to provide an incident free workplace that will meet or exceed environmental, health, and safety standards.
6. Maintaining a Business Ethics and Conduct Policy which requires all employees to adhere to ethical business conduct and to comply with all federal, state, provincial, local, and where applicable, foreign law and regulations.
7. Maintaining of an Ethics Committee which oversees compliance with the Business Ethics and Conduct Policy. The Ethics Committee strives to ensure that all business decisions and all corporate actions at Zekelman are undertaken in full compliance with the requirements of the Business Ethics and Conduct Policy. The Ethics Committee may conduct investigations, if necessary, and it is responsible for implementing proper corrective action in the event of a violation of the policy.
8. Maintaining a Workplace Anti-Violence, Anti-Discrimination and Anti-Harassment Policy and Program which encourages workers to raise any concerns about workplace violence, discrimination, and harassment.

FORCED LABOUR AND CHILD LABOUR RISKS

Zekelman recognizes that certain goods have a higher risk of forced labour or child labour.¹ Zekelman has identified risks in its activities and supply chains to the best of its knowledge and it will continue to strive to identify emerging risks. It is aware that there may be higher risks of child labour and forced labour associated with certain regions, goods, and industries.

REMEDIATION MEASURES

Zekelman has not identified any forced labour or child labour in its activities or supply chains. As such, it has not undertaken any remediation measures.

REMEDIATION OF LOSS OF INCOME

Zekelman 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 its activities and supply chains. As such, it has not undertaken any remediation measures for loss of income.

TRAINING PROVIDED TO EMPLOYEES

In the 2024 reporting year, Zekelman did not provide training to its employees specific to forced labour or child labour. However, in April 2025, Zekelman introduced mandatory training for all employees specific to forced labour and child labour.

ASSESSING EFFECTIVENESS

Zekelman assesses its effectiveness in addressing the risks of forced labour and child labour in its activities and supply chain by:

1. Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour; and
2. Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses.

In addition, as outlined above, the policies and procedures that are currently in place also reduce the risk that child labour and/or forced labour is present in Zekelman's activities and supply chain.


APPROVAL AND 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.

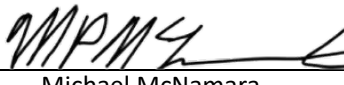
¹ See, for example, U.S. Department of Labor – Bureau of International Labor Affairs, "List of Goods Produced by Child Labor or Forced Labor": <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>.

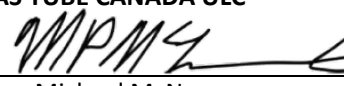
IN WITNESS WHEREOF the authorized signing officers have executed this report as of the effective date of the signatures set out below.

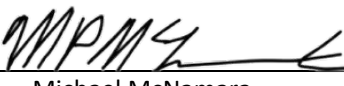
SIGNED)
May 30th, 2025) **ZEKELMAN INDUSTRIES, INC.**
_____))
) **Per:** 
) **Name:** Barry Zekelman
) **Title:** Chairman of the Board
) I have authority to bind Zekelman Industries Inc.

SIGNED)
May 30th, 2025) **1156676 ONTARIO LTD.**
_____))
) **Per:** 
) **Name:** Barry Zekelman
) **Title:** Director
) I have authority to bind 1156676 Ontario Ltd.

SIGNED)
May 30th, 2025) **MAN OF STEEL HOLDINGS LTD**
_____))
) **Per:** 
) **Name:** Barry Zekelman
) **Title:** President and CEO
) I have authority to bind Man of Steel Holdings Ltd

SIGNED)
May 30th, 2025) **6582125 CANADA INC**
_____))
) **Per:** 
) **Name:** Michael McNamara
) **Title:** Vice President
) I have authority to bind 6582125 Canada Inc

SIGNED)
May 30th, 2025) **ATLAS TUBE CANADA ULC**
_____))
) **Per:** 
) **Name:** Michael McNamara
) **Title:** Vice President & Sectary
) I have authority to bind Atlas Tube Canada ULC

SIGNED)
May 30th, 2025) **ATLAS ABC CANADA ULC**
_____))
) **Per:** 
) **Name:** Michael McNamara
) **Title:** Vice President and Secretary
) I have authority to bind Atlas ABC Canada ULC

SIGNED

May 30th, 2025

Date

JMC STEEL CAPITAL LLC

Per: 

Name: Michael McNamara

Title: President & Secretary

I have authority to bind JMC Steel Capital LLC

SIGNED

May 30th, 2025

Date

WHEATLAND TUBE, LLC

Per: 

Name: Michael McNamara

Title: President

I have authority to bind Wheatland Tube, LLC

SIGNED

May 30th, 2025

Date

ATLAS TUBE (ARKANSAS) INC.

Per: 

Name: Michael McNamara

Title: President

I have authority to bind Atlas Tube (Arkansas) Inc.

SIGNED

May 30th, 2025

Date

ATLAS TUBE (CHICAGO), LLC

Per: 

Name: Michael McNamara

Title: President

I have authority to bind Atlas Tube (Chicago), LLC

SIGNED

May 30th, 2025

Date

ATLAS TUBE (PLYMOUTH), INC.

Per: 

Name: Michael McNamara

Title: President

I have authority to bind Atlas Tube (Plymouth), Inc.

SIGNED

May 30th, 2025

Date

ATLAS TUBE (ALABAMA), INC.

Per: 

Name: Michael McNamara

Title: Company Secretary

I have authority to bind Atlas Tube (Alabama), Inc.

