

## Forced Labour in Canadian Supply Chains

Annual Report for Fiscal Year Ended December 31, 2023

### Introduction

This joint report is prepared pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) on behalf of Ampacet Corporation, Ampacet Delaware Holding Company, LLC, and Ampacet Canada Company (collectively, “we” or “**Ampacet**”). The statement is issued for the fiscal year that ended December 31, 2023.

Ampacet Corporation does business in Canada through Ampacet Canada Company (Business Number 896699220), a subsidiary of Ampacet Delaware Holding Company, LLC which is owned and controlled by Ampacet Corporation. Ampacet Corporation also publishes statements on its efforts to address the issue of forced and child labour in compliance with [California Transparency in Supply Chains Act of 2010](#).

Ampacet Corporation advances the future of plastics by bringing forward-thinking solutions to our customers that increase product performance, durability and sustainability. We are committed to achieving sustained growth and profitability by designing innovative, cost-effective and sustainable solutions to enhance plastics’ visual appeal, functionality and performance beyond limits. We are committed to our core values of safety & sustainability, diversity, accountability and innovation. We are committed to exhibiting the highest standards of ethical behavior and business integrity in all that we do, including a zero-tolerance policy of any forced and child labour existing within our supply chain.

At Ampacet, we take these commitments seriously and expect the same from those with whom we do business.

### Ampacet Corporate and Supply Chain Overview

Headquartered in Tarrytown, N.Y., Ampacet Corporation employs more than 2,000 people worldwide and has a total of 58 subsidiaries across the globe, including Ampacet Canada Company located in Kitchener, Ontario. Ampacet operates 22 manufacturing sites in 17 countries, including: Argentina, Belgium, Brazil, Canada, Chile, China, India, Israel, Italy, Luxembourg, Mexico, Poland, Russia, Thailand, the U.A.E, the U.K., and the U.S. and maintains four technical and color R&D centers across the Americas, Europe, and Asia. Ampacet products are sold in more than 90 countries.

Ampacet products are used in applications ranging from packaging, sporting goods, home decor, cosmetics, and beauty to appliances, automotive, healthcare, 3D printing and aerospace. We partner with our suppliers and customers to create masterbatch formulations that help bring products to market quickly. Ampacet’s global and multidisciplinary teams offer in-depth technical, analytical and color-matching support as well as on-site troubleshooting services and prototyping.

Raw materials used and sold through Ampacet's United States and Canadian operations originate from the United States (80%), Canada (12%), Belgium (3%), and suppliers across 26 additional countries that each account for less than 1% of raw materials spend.

### Identification of Supply Chain Risks

Ampacet Corporation conducts regular risk assessments of both internal operations and its global supply chain to identify risk areas. Ampacet acknowledges that any form of manufacturing carries some risk of forced and/or child labour being used. To offset this risk, Ampacet conducts all manufacturing in-house with diligent worker recruitment and hiring practices.

Aspects of Ampacet's supply chain that carry a risk of forced labour or child labour being used include mining and smelting operations required for the production of some inputs used in Ampacet products, as well as any raw materials regardless of production method that are sourced from suppliers in Asia-Pacific. Ampacet performs secondary due diligence for all raw materials suppliers that includes confirming suppliers comply with the California Transparency in Supply Chains Act of 2010 to address this risk, in addition to all standard supplier due diligence policies and practices.

In reaction to reports of forced labor in China's Xinjiang Region, and in accordance with the Uyghur Forced Labor Prevention Act (UFLPA), Ampacet has queried our supply chain to determine and ensure that no Ampacet materials contain ingredients sourced from this region. Ampacet has received near 100% response rate to our inquiries, with all responses confirming that material is not sourced from the Xinjiang Uyghur Autonomous Region of the People's Republic of China. We continue to work with our suppliers to confirm the remaining items and are confident that none of the remaining materials are sourced from this region.

Ampacet will continue to identify emerging risks as conducts its annual supply chain risk assessment.

### Policies and Due Diligence Practices

Ampacet is committed to prioritizing the safety, well-being and dignity of all individuals who make our company a success. We are committed to the safeguarding of human rights in all the countries in which we operate. Our supply chain practices and policies are designed to further our commitment to ensure the highest standards of safety, human health and environmental stewardship are integrated into every aspect of our global operation.

#### *Internal policies*

Key employees and management must adhere to Ampacet's [Global Code of Conduct](#) which requires obeying all applicable laws and regulations.

No engagement in coercion, slavery, or human trafficking is allowed. As Ampacet's policies reiterate, workers must freely choose employment and have the right to leave, with full freedom of movement and without fees for employment. All employees, including those in Ampacet-owned manufacturing facilities, know and have copies of their terms and conditions of employment that comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

If an employee or contractor fails to meet company standards regarding slavery and human trafficking, the ramifications will be determined on a case-by-case basis predicated upon the facts and circumstances.

#### *Supply chain due diligence policies and procedures*

Ampacet's suppliers are expected to demonstrate compliance and to provide Ampacet, or its representative, with any reasonable request for information to confirm compliance. The company has policies that forbid child labor, ensuring workers meet the minimum legal age and have completed compulsory education. Suppliers must verify workers' ages and provide proof to Ampacet upon request. Young workers must not perform hazardous work or work interfering with their education.

Ampacet vendor setup process requires all new vendors serving its United States and Canadian subsidiaries to comply with the Anti-Slavery policy, Conflict Minerals Act, CA Transparency Supply Chain Act of 2010, and Ampacet's [Supplier Code of Conduct](#). Ampacet's Supplier Code of Conduct, which must be signed by all suppliers supporting Ampacet's business in Canada, requires suppliers company with all applicable laws and regulations in the countries in which we operate, including but not limited to relevant laws and regulations on sanctions, export controls, reporting obligations, privacy, data protection, insider trading, anti-corruption, anti-bribery, antitrust, human rights, health and safety, labor, and environmental protection. Suppliers are expected to conduct appropriate due diligence on third parties. Supplemental sourcing questionnaires also collect sourcing information and policies related to sources and compliance with minerals-specific regulations from all raw materials suppliers. Suppliers must also verify workers' ages and provide proof to Ampacet upon request. Young workers must not perform hazardous work or work interfering with their education.

Ampacet has mapped all Tier 1 suppliers by production location and maintains this information in a centralized repository, to use in risk assessment and monitoring.

#### **Employee Training on Forced and Child Labour**

Ampacet currently does not provide training to employees on identifying and mitigating the risk of forced and/or child labor, internally and/or in its supply chain. However, all Ampacet employees are required to annually read and sign the following Ampacet's [Rules of Conduct](#), in which forced labor is specifically addressed.

Ampacet Management is reviewing the need for formalized policies and any additional training to further reduce the risk of forced and child labour in our operations.

#### **Remediation Measures**

As of December 31, 2023, Ampacet Corporation has not identified any instances or suspected instances of forced labour or child labour in our activities or supply chains and has therefore not had to take actions to remediate such situations. Ampacet also 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 and supply chains.

### Assessing Effectiveness

Ampacet currently does not have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains. Ampacet does not engage in any forced labour practices at any of our facilities. We are currently reviewing our policies and procedures to determine any further need for formalized policies and any additional training.

Ampacet has engaged a third-party to conduct a review of the organization’s policies and procedures related to forced and child labor for 2024.

### 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 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.

Gary Justiniano

Chief Financial Officer

May 30, 2024



I have the authority to bind Ampacet Corporation, Ampacet Delaware Holding Company, LLC, and Ampacet Canada Company.