



**DOCUMENT TITLE:** Modern Slavery Report for Composites One Canada ULC

ENTITIES COVERED: Composites One Canada ULC

**EFFECTIVE DATE**: 2025

## 1. Introduction.

- a. This Modern Slavery Report (this "Report") is prepared by Composites One Canada ULC (the "Company") and describes the actions taken by the Company during the period January 1, 2024 through December 31, 2024 (the "Reporting Period") to assess, prevent, and reduce the risk that forced labour or child labour is used at any step in its operations and supply chains pursuant to the requirements of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"). In this report, the Company uses the term "Forced Labour" to encompass instances of both forced labour and child labour.
- b. The Company is committed to respecting human rights and to the prevention of Forced Labour from occurring in any of its own operations or throughout its supply chains. The Company is also committed to identifying, assessing and addressing risks of Forced Labour across its business and supply chains as well as to continuous improvement of its systems and controls to better mitigate Forced Labour risks.

## 2. <u>Organizational Structure, Activities and Supply Chains</u>

- a. <u>Structure and Activities</u>. The Company is a Canadian subsidiary of Composites One LLC (U.S.) and is headquartered in Langley, British Columbia, Canada. The Company serves a wide range of industries including aerospace, construction, consumer recreation, cultured marble and solid surface, defense and ballistics, industrial and corrosion, infrastructure, marine, transportation, and wind energy and power. The Company's mission is to be the premier source for the most comprehensive range of products, services, and expertise available to composites manufacturers.
- b. <u>Supply Chains</u>. The Company operates six distribution centers in Canada, located in British Columbia, Manitoba, Nova Scotia, Ontario, and Quebec. The Company works with industry-leading suppliers, to provide an extensive line of quality products. In addition to composite and process materials, the Company provides customers with a variety of value-added services, including product selection, specification, technologies training, technical applications reviews, regulatory compliance assistance, delivery, handling and use. This support helps customers enhance quality and productivity, reflecting the Company's ongoing commitment to industry advancement.
- 3. <u>Policies and Due Diligence Processes</u>. The Company is committed to conducting business with integrity and honesty. Principles of ethical conduct are at the heart of the Company's core values.
  - a. <u>Code of Conduct</u>. The Company's Code of Conduct sets global expectations in the areas of business integrity, labor practices, health and safety of employees, and environmental management. The Code of Conduct directly addresses Forced Labour issues and mandates that all work shall be performed on a voluntary basis only, and that workers shall be free to terminate their work upon reasonable notice. The Company does not tolerate the use of, or benefit from, any form of Forced Labour. Recruiting, hiring, transporting, or obtaining persons by means of threat, force, coercion, fraud, or other means for the purpose of exploitation is prohibited. Compliance with all applicable modern slavery and Forced Labour laws and regulations, including the Act, is mandatory. The Code of Conduct applies to all employees.





officers and directors, as well as short-term contractors and temporary employees. The Company expects all suppliers, vendors, contractors, and other providers of goods and services to exhibit the values and principles expressed in the Code of Conduct. Moreover, it is expected that the suppliers uphold these principles and standards by representing them throughout the entire supply chain. The Company strives to provide safe working conditions, proactively manages health and safety risks, and actively works to minimize exposure to hazards. The Company also provides extensive training with regards to health and safety matters.

- b. <u>Due Diligence</u>. The Company works diligently to source products from suppliers who share the Company's ethical conduct commitments, including with respect to Forced Labour, to ensure that its supply chain is in compliance with its Code of Conduct. The Company regularly evaluates its supply chain to identify potential risks. The Company's purchase order terms and conditions require that suppliers represent that neither they nor their subcontractors, vendors, agents or other associated third parties use any form of Forced Labour in their business practices. These terms and conditions are provided to vendors when they are brought on as a supplier to the Company.
- c. <u>Grievance Mechanism</u>. The Company promotes a workplace free from discrimination and harassment. The Company is committed to maintaining a safe work environment where employees feel valued and provides channels for anonymously reporting concerns. Both employees and business partners, including suppliers, vendors, and contractors, are encouraged to report suspected unethical, illegal, or unsafe activities to managers, through a confidential ethics hotline and online platform.
- 4. Risk of Forced Labour Being Used and Remediation Measures.
  - a. <u>Forced Labour Risk</u>. The Company is committed to assessing and addressing potential Forced Labour risks in its supply chain and using reasonable and necessary measures to remediate any adverse effects identified. If risk of Forced Labour is identified, the Company takes steps to investigate and mitigate such risks. Based on its business processes, the Company believes that its risk of exposure to Forced Labour is low but is continually working to better understand its exposure based on evolving circumstances.
  - b. <u>Remediation Measures</u>. During the Reporting Period, the Company did not identify any instances of Forced Labour in its activities and supply chains and did not identify any instances of the unintended consequence of contributing to a loss of income for vulnerable families as a result of any steps the Company took with regard to risks of Forced Labour. For this reason, no remediation measures were necessary.
- 5. <u>Training</u>. To ensure a sufficient of understanding the risks of Forced Labour in the Company's supply chains and in the business, the Company provides annual training to employees, officers and directors, as well as short-term contractors and temporary employees, that work in areas at risk for Forced Labour.
- 6. <u>Assessing Effectiveness</u>. The Company monitors compliance with its Code of Conduct on an ongoing basis. The Company also reviews questions and concerns raised through its ethics hotline and the online platform. During the Reporting Period, no material concerns or complaints were identified.
- 7. <u>Approval and Attestation</u>. This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Composites One Canada ULC.