



# ANNUAL PUBLIC REPORT

2022/3 FORCED AND  
CHILD LABOUR RISKS ©

Central Graphics and Container Group Ltd.

Report Date: 05/24/2024

## REPORT PURPOSE

Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, formerly known as Bill S-211, requires certain Canadian business entities to report forced and child labour risks across their operations and supply chains, and publicly disclose their practices regarding human freedoms. Effective May 31, 2024, Central Graphics and Container Group Ltd. ("the Company") is required by Public Safety to submit an annual online questionnaire, and provide the public with an annual report available on our website that specifically addresses the requirements included in section 11 of the Act:

1. Per subsection 11(1), a description of the steps taken [by the Company in the last fiscal year] to prevent and reduce risks of forced labour and child labour
2. Per subsection 11(3), supplementary information addressing each of seven requirements:
  - 1) [A] Company structure, [B] activities and [C] supply chains
  - 2) Policies and due diligence processes in relation to forced labour and child labour
  - 3) Parts of its business and supply chains that carry risks of forced labour or child labour being used and the steps it has taken to assess and manage that risk
  - 4) Any measures taken to remediate any forced labour or child labour
  - 5) Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains
  - 6) The training provided to employees on forced labour and child labour
  - 7) How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains
3. Per subsection 11(4) and (5), report approval and bound Company attestation

## 2022/3 REPORT

### **Report Requirement 1: Description of Steps Taken to Prevent and Reduce Risks of Forced and Child Labour, 11(1)**

The Company is committed to best-managed governance, sustainable products, and processes, and achieving social progress. The Company vehemently opposes any form of Modern Slavery; there is no unpaid, forced, bonded or involuntary labour, including any child labour or employment in our business. The Company further ensures that forced labour and child labour are not practiced in our business and supply chains by these steps:

1. Voluntary job candidacy
2. Proof of Employee age of majority
3. Freely-chosen Employment Agreement
4. Equitable compensation and direct Employee wage payment
5. Master Service Level contracts confirming human rights protection
6. Vendor contractual clauses and confirmations specifying no forced or child labour
7. External Responsible Supplier audits of the Company
8. Quality Assurance certifications
9. Employment Policies and public Company statements that explicitly address Human Rights
10. Mandatory Policy training and bound Employee compliance
11. External ESG and Human Rights expertise consultation
12. Annual anti-forced labour internal assessment and planning, with results made public and available at [www.centralgrp.com](http://www.centralgrp.com)

**Report Requirement 2: Supplementary Information, 11(3) – 7 PARTS****PART 1, A) STRUCTURE INFORMATION**

Legal Name	Central Graphics and Container Group Ltd.
Legal Structure	Canadian-Controlled Private Corporation
Business number	139260970
Year End	August 31
[Act] Sector Categorization	Manufacturing (goods producer) Other: Retail Strategy Consultant, Design Agency, Fulfillment and Co-Packer, Logistics Management and Distributor
Organizational Structure	<ul style="list-style-type: none"> <li>- Team-based</li> <li>- Centralized Leadership and Strategy</li> <li>- Defined Chain of Command</li> <li>- Products and Services Divisions</li> <li>- Vertical Integration: Departmentation and Supply Chain</li> </ul>
Organizational Mandate	Performance at Retail
Location	CANADA <u>Head Office:</u> 5526 Timberlea Blvd, Mississauga ON L4W 2T7
Number of Employees, in/outside Canada	307
Partner organizations:	Packaging Technologies Inc. Independent Corrugator Inc. Central Services Group Inc.
Reporting obligations in other jurisdictions	none, n/a
Control by Entity of other entities	n/a

**PART 1, B) ACTIVITIES INFORMATION:**

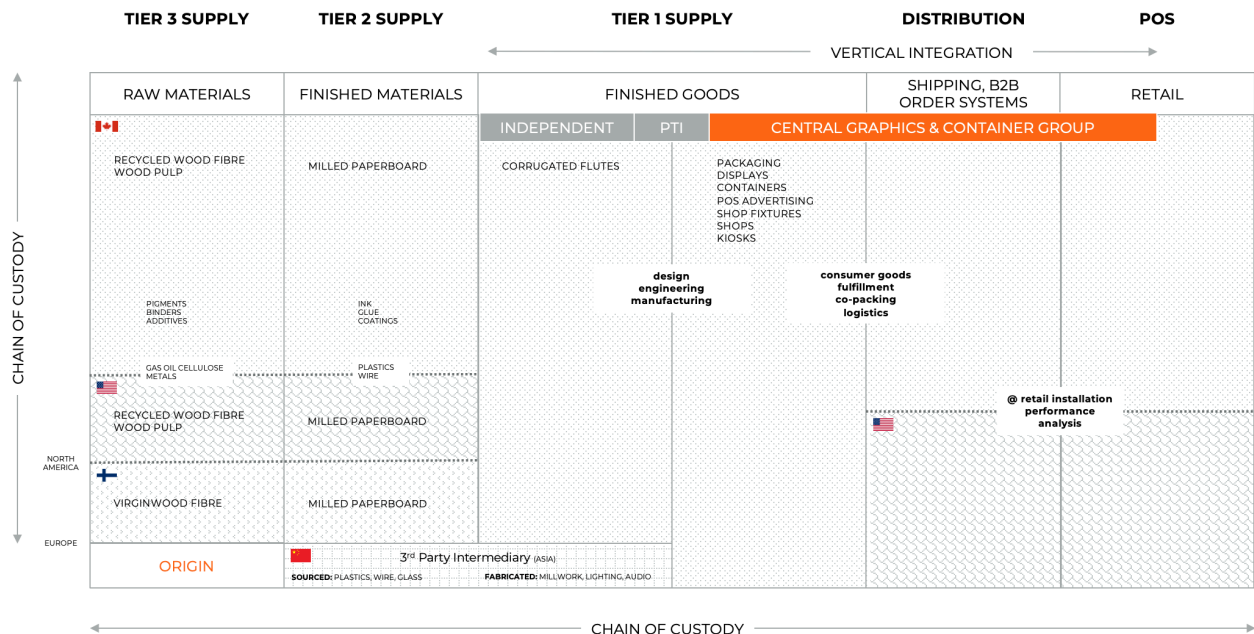
The Company is a leader in retail activation - designing, engineering, and manufacturing innovative packaging, displays, containers, POS advertising, fixtures, and retail environments (“Company-produced goods”) that enhance retail performance. We sell these goods directly or via B2B ordering systems and distribute to North American CPG Consumer Packaged Goods and Retail customers in essential food, beverage, household, and personal care categories.

**PART 1, C) SUPPLY CHAIN INFORMATION:**

The goods produced by the Company contain various wood fibres (raw materials) that originate from North America and Europe; this raw material is milled into paperboard. Paperboard is supplied to vertically-integrated supply partners for material conversion to corrugate (paper flute stocks) which is then sourced by the Company. The Company uses the corrugate configured with small amounts of other North American materials (ink, glue, coating) and other paper, to produce finished client goods for in-store distribution and use.

Although Company finished goods are primarily paper-based (~95%), on occasion Company product engineering requires the incorporation of specialized semi- and permanent parts and / or technology components that are not produced in-house by the Company. In these cases, finished materials or materials required for fabrication (<5%) are sourced in North America, or internationally from Asia using a single 3<sup>rd</sup> Party Intermediary, and are imported into Canada by the Company to be incorporated into the final product.

2022/3 Goods Supply Chain Diagram



**PART 2) POLICIES, AND DUE DILIGENCE PROCESSES relating to forced and child labour**

**Policies** of the Company that explicitly address Human Rights:

- A Corporate Responsibility Policy that outlines Environmental, Social, and Governance principles and practices, providing a comprehensive framework to understand and promote responsible business practices
- A Recruitment Policy that confirms age of majority, voluntary and equal opportunity candidacy
- A Fair Wages Policy that supports human freedom
- A Child Protection Policy to avoid exploitation of minors and reduce workplace exposure
- Human Rights: Anti-Violence and Anti-Harassment Policy

Company **Due Diligence Processes:**

- 2018 SMETA 4 Pillar Assessment, and Sedex member re-certification in 2022 (and 2025)
- Quality Audits and Goods Assurances: FSC, SQF, SFC, HC-SL, DEL, G7 Master Facility Qualification
- ISO Standards including MSLA contractual machinery, and Vendor Management system procedures
- Mandatory Policy training and bound Employee Compliance
- Annual Review of forced and child labour risks and annual public disclosure of human freedom practices via Bill S211 processes and insights

**Sedex**<sup>2</sup> | Member



### **PART 3) RISK IDENTIFICATION AND ACTIONS TAKEN to assess and manage forced labour and child labour risks**

#### **Risks Identified:**

The Company has considered the ways in which our activities and supply chains could potentially cause, contribute to, or be directly or indirectly linked to forced labour or child labour practices. When producing our client goods, the Company explicitly does not use raw materials listed on the U.S. Department of Labor's (USDOL) flagship 2020 report [List of Goods Produced by Child Labor or Forced Labor](#), and all vendors are managed through a comprehensive system of contractual assurances and chain of custody protections that include confirmation of non-forced and no child labour practices.

With evidentiary support, the Company has concluded **very low risk** due to our policy and due diligence practices, location, sector categories, established chains of custody, and paper-based product majority. The Company has identified our forced labour and child labour risk exposure is limited to our lack of direct knowledge of the *origin* of the raw materials used in the finished materials provided to the Company by a 3<sup>rd</sup> Party Intermediary in China; the 3<sup>rd</sup> Party Intermediary is bound by chain of custody protections, confirmed by the Company.

#### **Actions Taken:**

The Company is accountable for upholding the highest ethical supply chain standards and we demonstrate our responsible business commitment through annual planning and daily practice. The Company holds SMETA 4 Pillar Responsible Supplier certification and Best-managed Company designation by Sedex and Deloitte respectively, and has taken the following additional actions with respect to forced and child labour risk mitigation:

- ESG Activities Roadmap -- developed in 2021 in consultation with pWc Price Waterhouse Coopers and clients, and includes strengthened Employment policies, and value-chain and material supply chain impacts (2023/4)
- A public Corporate Responsibility statement available on the [Company's website](#)
- Retainment of external and internal Human Rights expertise: Human Resources subject matter experts, and Employment and Corporate matters legal counsel
- Annual Public Reporting of forced and child labour risks and human freedom practices (this report)

### **PART 4) REMEDIATION MEASURES**

The Company has assessed that our activities and supply chain risks do not require remedial action, therefore remediation reporting is considered non-applicable.

### **PART 5) REMEDIATION OF LOSS OF INCOME**

The Company has concluded that vulnerable families have not experienced loss of income as a result of steps taken by the Company to eliminate forced labour or child labour risks, therefore no loss of income remediation measures have been taken in this area.

## **PART 6) EMPLOYEE TRAINING**

The Company provides forced labour and child labour training to all Employees, specifically through:

- Mandatory training of Employment Policies, including those related to Human Freedom:
  - Corporate Responsibility Policy
  - Recruitment Policy
  - Fair Wages Policy
  - Child Protection Policy
  - Human Rights: Anti-Violence and Anti-Harassment Policy
- Policy Compliance bound Agreement by Employees
- Comprehensive Vendor Management System and Procedures

## **PART 7) ASSESSING EFFECTIVENESS**

The Company is committed to effective policies and procedures related to forced labour and child labour; we self-review and audit our Company human rights policies and supply chain practices on a continual basis, and formally each annum through Bill S211 compliance processes and insights. The Company will continue partnering with external organizations for independent reviews of Company ethics to maintain quality assurance and Responsible Supplier certification(s).

### **Report Requirement 3: Report Approval and Bound Company Attestation, 11(4)(5)**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity Central Graphics and Container Group Ltd. 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 2022/3. I have the authority to bind Central Graphics and Container Group Ltd.



Rick Eastwood, President and CEO

Dated May 24, 2024