

DPCC Modern Slavery Statement

1 Introduction

- 1.1 At Diamond Petrochemicals Canada Corporation (DPCC), we are committed to acting ethically and with integrity in all our business dealings and relationships, and to promote compliance with applicable laws and protect the dignity and rights of all people connected to our business. We strive to work more closely with our suppliers to ensure their workforce, and the workforce of their supply chains are treated with respect and dignity. At the heart of our mission lies a commitment to fostering inclusive workplaces and sourcing products responsibly.
- 1.2 This is DPCC's first modern slavery statement pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9), and it will be reviewed annually hereafter. We acknowledge that stamping out modern slavery and human trafficking risk is a process that will take time. Our reporting outlines the measures we have or will have in place and the efforts we have commenced to assess and address risks of modern slavery and human trafficking in our business and supply chain.

2 Our Organizational Structure, Business Operations and Supply Chains

- 2.1 DPCC is designated as a single entity. DPCC is also a subsidiary of Mitsubishi Corporation (MC).
- 2.2 Nova Chemicals is a global manufacturer in the Petrochemicals industry and is a supplier to DPCC. It employs 2500 people in Canada and the United States and has business operations in both countries. Its activities include the production, sale, and import of goods in Canada and outside Canada.
- 2.3 Univar is a global distributor in the chemical sector and is a supplier to DPCC. It employs 10,000 people worldwide and has business operations in North America, LATAM, UK, Ireland, France, EMEA and APAC. Its activities include distribution within and outside of Canada.
- 2.4 The goods are used in the manufacturing of our products, including butylene's and proprietary processed chemistry are sourced from these suppliers located in Canada. Our supply chain also includes ancillary services that contribute to our main production operations, such as transporters and carriers.
- 2.5 To learn more about our business, please see diamondpetrochemicals.com.

3 Our Supply Chain Risk Profile

- 3.1 Within our operations, we have assessed our risk profile based on sector and industry and have rated the organization as a low risk. All our workers are employed in Canada, where we have fair and responsible employment practices in place to protect and promote workers' rights.
- 3.2 That said, we recognize that risks of modern slavery may be present in our supply chain in areas such as, indirect suppliers. Since these workers would not be directly employed by DPCC, we have less control and visibility over their working conditions and employment terms. We will tailor our risk management actions to address those risks.

4 Actions Taken to Combat Slavery Risks

- 4.1 DPCC is in the process of developing and implementing strategies to:
- (a) Assess and better understand areas of potential risk in our business and supply chain;

- (b) Monitor potential risk areas in our business and supply chain; and
 - (c) Reduce or mitigate the risk of slavery and human trafficking occurring in our business and supply chain.
- 4.2 DPCC plans to assess and manage risk by maintaining consistent and high standards of due diligence and risk mitigation processes to monitor for and avoid modern slavery in all environments in which DPCC operates in, including developing and implementing those policies, processes and actions discussed in sections 5 to 8 below.
- 4.3 Such processes and actions include, but are not limited to, the following:
- (a) Develop an Anti-Slavery Policy. The policy will be communicated with supplier's and in turn establishing the supplier's commitment to compliance with the policy.
 - (b) DPCC will provide training to all employees to raise awareness of this issue within the organization;
 - (c) DPCC may conduct supplier audits;

5 Our Policies on Modern Slavery

- 5.1 DPCC is in the process of developing an internal Anti-Slavery Policy. It will reflect our commitment to acting ethically and with integrity in all our business relationships and to enforcing effective systems and controls to prevent modern slavery from taking place in our business and supply chain.
- 5.2 DPCC will ensure its suppliers are aware of the policies and adhere to the same high standards.
- 5.3 DPCC is guided by the following relevant policies: MC Code of Business Conduct, Basic Rules for Organization and Implementation of Compliance and Global Whistleblowing. We are also guided by MC's three Corporate Principles; Corporate Responsibility to Society; Integrity and Fairness and Global Understanding through Business.
- 5.4 Mitsubishi Corporation's Modern Slavery Statement for the Canadian operations provides an additional level of commitment. See attached link. [Modern Slavery Statement \(UK, Canada\) | Mitsubishi Corporation](#)

6 Due Diligence Processes

- 6.1 To identify and manage risks of modern slavery and human trafficking in our own business, we carry out background checks and periodically reassess our employment practices to ensure we meet or surpass employment standards in all jurisdictions in which we operate.
- 6.2 We are in the process of reviewing and improving our approach to supplier due diligence with the aim of ensuring an action plan to address modern slavery risks. As part of our initiative to identify modern slavery risks in our supply chain, we will complete a supplier risk-mapping assessment, starting with our key suppliers.
- 6.3 Certain key suppliers have been asked to complete a comprehensive supplier due diligence questionnaire and lower-risk suppliers may be asked to do the same during the next reporting period.

As we receive responses from our suppliers, we reserve the right to undertake additional verifications and audits.

- 6.4 As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain we will consider adopting other due diligence procedures

7 Supplier Adherence to Our Values

- 7.1 DPCC seeks to do business with suppliers that have similar values, ethics, and moral business practices, including those related to human rights. DPCC will not tolerate any form of modern slavery and human trafficking within its supply chain.

8 Training

- 8.1 We will be providing an awareness training program to make sure our employees are aware and capable of recognizing and reporting the risks of modern slavery and human trafficking in our business and supply chain.
- 8.2 To further develop the above-mentioned policies, we plan to include information regarding modern slavery risks in our employee onboarding materials. Taking a risk-based approach, we plan to develop training for all staff on how to detect and report human trafficking and all forms of modern slavery risks.

9 Remediation Measures

- 9.1 To date, we have not identified any instances of modern slavery or human trafficking in our business and supply chains, therefore, we have not been required to take remedial measures.

10 Remediation Measures Relating to Loss of Income to Vulnerable Persons

- 10.1 We recognize that instances of modern slavery and human trafficking often impact the human rights of particularly vulnerable groups, such as migrant labourers, unskilled labourers, indigenous people, women, or children. To date, we have not discovered instances of modern slavery in our business and supply chain, therefore, we have not been required to take measures to remediate the would-be loss of income to vulnerable families.

11 Effectiveness in Combatting Modern Slavery Risks

- 11.1 To date, DPCC has not taken any actions to assess the effectiveness of our actions in preventing and reducing risks of modern slavery in our activities and supply chain. Going forward, we will assess the effectiveness of our actions by evaluating KPIs, namely the number of staff trained, the number of suppliers and contractors screened, the number of reported breaches, and the instances of remedial actions being taken.

12 Approval of the Statement

- 12.1 This statement is made in accordance with Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and constitutes DPCC's [joint] modern slavery statement for the financial year commencing on April 1, 2023, and ending on March 31, 2024.
- 12.2 This statement was approved by the Board of Directors of DPCC pursuant to Paragraph 11(4)(a) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* on May 10, 2024.
- 12.3 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.

Signed,

DocuSigned by:
Koji Osuka
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Koji Osuka
CEO

Date: 10th, May, 2024

I have the authority to bind DPCC

DIAMOND PETROCHEMICALS CANADA CORPORATION(the “Company”)

RESOLUTION OF THE DIRECTORS

The undersigned, being all of the directors of the Company, hereby consent to and adopt the following resolution, pursuant to the *Business Corporations Act* (British Columbia):

WHEREAS the Company has prepared the attached Modern Slavery Statement.

RESOLVED that:

- the Company files a public report with the Minister of Public Safety and Emergency Preparedness of Canada as required The Canadian Modern Slavery Act. (Resolution item #32)

[Signature page to follow]

This resolution may be signed in counterparts and delivered by facsimile, electronic mail or other electronic transmission. Each such counterpart will be deemed an original document and all of such counterparts taken together will constitute one original instrument.

DATED as of the 10th day of May, 2024.

DocuSigned by:
Hideki Adachi
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Hideki Adachi

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