

Report Against Modern Slavery

This report, issued by Empack in accordance with section 11 of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act"), covers the fiscal year ending July 31, 2023. It outlines the measures taken to prevent and mitigate the risk of forced labour, child labour and other forms of slavery (referred to as "Modern Slavery") in the production of goods at our domestic facility and includes any goods imported into Canada. This report covers the activities of Empack Spraytech Inc. and its subsidiaries, collectively referred to as "Empack" "we," "us," or "our."

Structure

Established in 1999, Empack is a privately owned and family-operated Canadian manufacturing company. We specialize in innovative and vertically- integrated manufacturing of commercial and consumer products. We provide comprehensive full-service packaging solutions for aerosol, bag-on-valve, liquid, lotion, and gel products. Empack operates as a corporation under the laws of Canada with its head office and registered address located at 98 Walker Drive, Brampton, Ontario, Canada, L6T 4H6.

Activities

Empack offers expertise in developing the best products and strategies for our customers' brand's success. We specialize in: on-site research & development, customized formulations, advanced product solutions, and offer consistent supply chain reliability to companies across North America and internationally.

Empack specializes in manufacturing a wide array of products for both private label and multi-national consumer brands. Our specialized products and services cater to customers operating in various industries, including Personal Care (Health & Beauty), Pharmaceutical, Automotive Care, Household Goods, Computer Care & Electronics, Shoe & Leather Care, Industrial Products, Outdoor & Marine Products.

Expertise

Empack excels in providing expertise throughout the product development and manufacturing process.

- **Our Production Expertise** includes Aerosols, Bag-On-Valve, Bottles & Pumps, Tubes, Propellant blending with the ability to fill or blend various combinations of propellants, multi-stage filling of both liquid and propellants, and high powder content aerosols.
- **Our Product Expertise** includes custom product development and formulations, cutting-edge packaging solutions, unique containers and multi-pack assembly, lithographed cans, heat-shrink sleeves, pressure sensitive labels and silk screening.
- **Our Merchandising Capabilities** include POP Displays, Countertop Displays, Pallets and ¼ Pallets, Clamshell Packaging, Blister Packs and Kit Assembly, and product Multi-packs.
- **Our Regulatory Compliance** services include Labelling compliance in various jurisdictions, PLL Regulations, Cosmetic Regulations, CFR (FDA & CPSC) and (EC) No 1223/2009, SDS, and GHS compliance support

- **Our Product Compliance** services include VOC, REACH, Prop 65, ODSHAR, and DG compliance.

Certifications

Empack holds the following certifications: Health Canada Drug Establishment License (DIN), Health Canada Site Licence for Natural Health Products (NPN), FDA Establishment Licence (NDC), PMRA (PCP) Registered Products, and EPA Establishment Registration

Supply Chains

Empack sources goods from suppliers based in Canada, the United States of America, Asia, and Europe. The types of goods procured by Empack mainly include equipment, materials, and supplies used in the production of finished goods.

Governance and Policies

Every employee, officer, and director of Empack holds a position of trust within the company. Regardless of their role or level of responsibility, individuals are expected to act honestly, ethically, with integrity and in full compliance with all applicable laws and regulations.

In 2024, the Empack ownership team will introduce and adopt a comprehensive Code of Business Conduct and Ethics ("Code of Conduct"). This document will serve as a guide that is intended to sensitize employees, directors, and officers to significant legal and ethical issues that may arise. This document will also provide mechanisms to report illegal or unethical conduct. The Code of Conduct will provide assurance that reporting of questionable behavior is protected and encouraged.

Compliance with the Code of Conduct will be mandatory for all Empack's directors, officers and supply chain employees. Certain contractors, agents, and other representatives of Empack may also be required to comply with the Code of Conduct. The Code of Conduct will affirm Empack's commitment to respecting human rights both internally and externally and with those with whom we do business. We respect human rights by seeking to avoid infringing on the rights of others and seek to address adverse human rights impacts with which Empack may become involved.

Notably, the Code of Conduct explicitly prohibits the use of Modern Slavery. Empack will engage only with suppliers who comply with applicable legal requirements including any applicable regulations requiring the conduct of background checks, and other company standards relating to, among other things, ethical labour standards. This commitment extends to ensuring that child or forced labour is not utilized in any part of our supply chain.

Potential Risks in our Operations and Supply Chains

We do not perceive any risk of Modern Slavery in our Canadian operations. All our employees work in Canada, a country characterized by a low prevalence of Modern Slavery, minimal vulnerability to such practices, and a robust government response to such issues. Additionally, our workforce is predominantly composed of skilled, qualified, and experienced individuals.

We acknowledge that certain manufacturing regions and materials are associated with higher Modern Slavery risks due to prevalence in specific countries. To mitigate these risks, we will

conduct due diligence through questioning our non-Canadian suppliers and will continue to do so in the future.

Remediation

If we were to become aware of or uncover potential or confirmed instances of Modern Slavery within our supply chains, we would investigate and implement suitable remedial actions, which may involve stopping, preventing, or reducing any negative impacts.

During the last fiscal year, we did not detect any cases of Modern Slavery in our supply chains. Therefore, no remedial actions were necessary, including measures aimed at addressing any loss of income on vulnerable families that resulting from any measure taken to eliminate the use of Modern Slavery in its activities and supply chains.

Training

Empack intends to conduct training during the current fiscal year for all employees, notably those involved in procurement, sourcing, and sales on the topic of Modern Slavery and their associated responsibilities. Our management team is responsible for creating, upholding, and evaluating the company's supply chains and supplier selection process.

As part of our governance framework, we regularly conduct assessments of the effectiveness of our risk controls, including those associated with our supply chains, which are appropriate for a company of our size and scope. Our aim is to build on these controls in the next fiscal year.

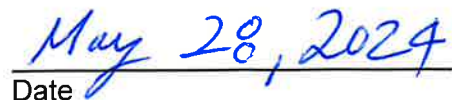
Attestation

In accordance with section 11 of the Act, I attest that I have reviewed the information contained in the report. To the best of my knowledge, and after exercising reasonable diligence, I affirm 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 by



Ara Nalbandian
Executive Vice President
Empack Spraytech Inc.



Date