



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 Glazed Ultimate Holdings LLC, Glazed Holdings Inc USA, ST Athena Global LLC (USA), ST Athena Global Holdings Ltd (UK), Steelite International USA Inc., Steelite International Limited (UK), and Steelite International Canada Limited (collectively, “we” or “Steelite”). The statement is issued for the fiscal year that ended December 31, 2023.

The parent entity, Glazed Ultimate Holdings, LLC does business in Canada through Steelite International Canada Limited (Business Number 128019445). The organization uses several holding companies which serve as acquisition vehicles for the company’s subsidiaries. Glazed Ultimate Holdings, LLC, operates through Glazed Holdings, Inc which subsequently operates through ST Athena Global LLC. ST Athena has both a US and UK holdings. The company serves the Canadian market through both Steelite International USA Inc, a wholly owned subsidiary of ST Athena USA Holdings Inc., and Steelite International Canada Limited which is wholly owned by Steelite International Limited (UK) which is in turn owned by ST Athena Global Holdings, Ltd.,

Steelite also publishes statements on its efforts to address the issue of forced and child labour in compliance with the [United Kingdom’s Modern Slavery Act 2015](#).

Steelite Corporate and Supply Chain Overview

Steelite’s products are integral to the hospitality industry, offering a wide range of tableware, glassware, and flatware that cater to various sectors including restaurants, hotels, cafes, and catering services. We collaborate closely with our suppliers and clients to develop innovative, high-quality tableware solutions that enhance dining experiences.

Across its regional subsidiaries, Steelite has manufacturing operations in the UK, USA, and Mexico, and distribution centers in the USA, UK, Canada, Netherlands, Germany & Australia.

Steelite products sold in Canada are purchased through and imported into Canada by Steelite International USA Holdings, Ltd (Steelite US). Steelite US sells products in Canada that are produced by Steelite and its global entities as well as third-parties. Steelite’s largest third-party finished product suppliers serving customers in the United States and Canada manufacture in the UK and the European Union.

Steelite purchases five key categories of direct materials used at Steelite-owned manufacturing sites: alumina, sand, prepared body, glaze, and colour, all of which are sourced from the United Kingdom and European Union.

Identification of Supply Chain Risks

Steelite has also brought on Sedex as a 3rd party to assist with risk assessment of internal operations and its supply chain. Steelite manufactures a significant portion of the products it sells in Steelite-owned manufacturing facilities to reduce the risk of forced and child labor in its internal operations.

All of our product suppliers are required to comply with Steelite's Code of Conduct which defines standards for fair, safe, and healthy working conditions throughout the supply chain, including the prohibition of forced and child labour. The required compliance with this Code includes a commitment by direct suppliers to certify that materials incorporated into our products comply with the laws regarding slavery and human trafficking of the country or countries in which they do business. Steelite maintains a physical presence in China factories to oversee manufacturing processes and workplace conditions. Steelite's Sourcing and Quality teams responsible for making all sourcing and purchasing decisions make multiple visits to factories each year to monitor manufacturing processes and physical working conditions.

As part of Steelite's conducting business in a lawful, ethical and responsible manner, the company will continue to strive to identify emerging risks as conducts its annual supply chain risk assessment.

Policies and Due Diligence Practices

Steelite 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

Steelite prohibits the use of forced labour or any form of human trafficking within the organization or its sub-contractors. All workers must be able to freely move around and give reasonable notice to leave the employment of Steelite or the agency they are employed by. Under no circumstances are Steelite employees or employment agencies allowed to withhold a workers' personal documentation or identification papers. Suitable checks and audits must also be performed for all staff, whether internally hired or engaged through an approved staffing agency.

Supply chain due diligence policies and procedures

Steelite also embeds responsible conduct into supplier-facing practices and policies. Onboarding new suppliers requires the supplier to agree to the Code of Conduct as a standard part of new contracts. Steelite is in the process of sending the Code of Conduct to suppliers to legacy suppliers. In addition, any one-time suppliers without a formal contract must agree to the Code of Conduct.

All new suppliers must now also agree to signing up for Sedex prior to being onboarded. Included in Sedex for a Tier 1 supplier includes a questionnaire and audit that will be redone every 12 months. In 2023 43% of total

purchases globally were Sedex members. Steelite has a three-person team based in Asia to go into the factories and have a presence with the Chinese locations.

Employee Training on Forced and Child Labour

Steelite currently does not provide training to employees specifically focused on forced and child labour. It is a priority for us to ensure everyone in the organization is aware of the risks of modern slavery, we plan to introduce a mandatory annual web-based training for all supply chain employees starting in 2024.

Remediation Measures

As of December 31, 2023, Steelite 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. Steelite 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

The company also tracks which companies have signed off on Steelite's Supplier Code of Conduct and tracks the outcome of supplier audits and questionnaires that are performed and tracked through Sedex. Between the UK and Americans, there are different practices between goods purchased for manufacturing, although both are designed to ensure no use of forced and child labour throughout internal operations and Steelite's global supply chain.

Steelite's partnership with Sedex allows for a diligent onboarding process including questionnaires and audits, allowing for regular reviews and performance tracking indicators.

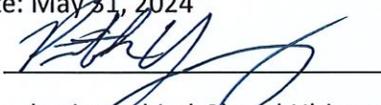
Approval and Attestation

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.

Name: W. Patrick Young

Title: General Counsel

Date: May 31, 2024

By: 

I have the authority to bind Glazed Ultimate Holdings LLC, Glazed Holdings Inc USA, ST Athena Global LLC (USA), ST Athena Global Holdings Ltd (UK), Steelite International USA Inc., Steelite International Limited (UK), and Steelite International Canada Limited.