

Report on Fighting Against Forced Labour and Child Labour in Supply Chains For the Financial Year Ended December 31, 2023

1. About This Report

Gold Bond Canada, Ltd. (**GB Canada** or the **Company**) has prepared this Report on Fighting Against Forced Labour and Child Labour in Supply Chains (the **Report**) in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9) (the **Act**) for the financial year ended December 31, 2023. In this Report, unless otherwise noted, references to “**GB Canada**,” the “**Company**,” “**we**,” “**us**,” “**our**” and similar expressions refer to Gold Bond Canada, Ltd.

2. Structure, Activities and Supply Chains

- a. **Structure.** GB Canada is a corporation formed under the *Canada Business Corporations Act*. Governance is overseen by a board of directors, duly appointed officers and operations management. GB Canada does not have any subsidiaries.
- b. **Activities.** GB Canada operates a gypsum quarry in Milford, Nova Scotia and dock operations in Dartmouth, Nova Scotia. The Company extracts gypsum rock from its quarry in Nova Scotia and transports the gypsum rock to its dock in Dartmouth. From there, the gypsum rock is loaded to ships and exported to plants owned and operated in the United States by an affiliated wallboard manufacturer (Gold Bond Building Products, LLC, a Delaware limited liability company). From time to time, GB Canada sells gypsum rock domestically to an unaffiliated Canada-based entity.
- c. **Supply Chains.** The nature of GB Canada’s business requires a limited supply chain. GB Canada’s operations are located entirely within the province of Nova Scotia, where the Company mines gypsum rock – a naturally occurring mineral. The Company then exports the gypsum in its natural state without additives or other raw materials. Any heavy equipment the Company requires is typically purchased and serviced locally. GB Canada imports equipment and replacement parts infrequently, typically from the United States.

3. Potential Risks of Forced Labour or Child Labour

As an entity with operations exclusively in Nova Scotia, Canada, and limited use of international supply chains, GB Canada has assessed its risk of forced labour or child labour occurring in its business to be quite low. GB Canada observes applicable legal requirements with respect to its hiring practices and working conditions and, among other hiring procedures, verifies that its employees are all over 18 years of age as a condition to employment.

The Company purchases most of its equipment and replacement parts locally and contracts with local providers for services such as maintenance and upkeep, and contractually requires such providers to comply with Canadian and U.S. law as applicable to their operations, thereby reducing the risk of forced labor or child labor as such legal regimes prohibit the use of the same.

4. Policies and Due Diligence

GB Canada observes various policies in its conduct of its business, including the following policies:

- Code of Business Ethics and Conduct
- Equal Employment Opportunity (EEO) and Anti-Harassment Policy
- Business Ethics and Conflicts of Interest Policy

Employees are required to review and comply with these policies or risk discipline for violations, up to and including termination.

GB Canada provides all employees access to a compliance portal known as NGCommitment. The NGCommitment portal provides copies of the Code of Business Ethics and Conduct as well as additional information regarding the Company's compliance reporting system for potential whistleblowers to report actual or suspected violations of the Code of Conduct or other legal or regulatory obligations, including a 24-hour monitored hotline.

In addition, GB Canada's standard Terms and Conditions of Purchase require all vendors to comply with all applicable laws and regulations affecting the manufacture and sale of the goods or provision of services to GB Canada by such vendor. Denied party screening is performed on all vendors and customers to identify potential instances of sanctions violations, bribery and corruption, and other illicit behavior by third parties with whom the Company considers doing business.

5. Steps taken to prevent and reduce risk of forced labour and child labour

As stated above, given the infrequency with which the Company interacts with entities outside Canada and the Company's limited procurement activities, the risk that forced labour or child labour is used in furtherance of the Company's operations is quite low. GB Canada complies with applicable law with respect to its recruiting practices and working conditions and sources almost all of its equipment, parts and consumable items domestically. These activities are likely sufficient to prevent and reduce the risk of forced labour and child labour by the Company.

6. Remediation

GB Canada has not identified any instances of forced labour or child labour for which remediation, including for loss of income, has been required.

7. Training

Recruiting personnel for the Company are trained to comply with the Company's policies and procedures to confirm that all candidates are aged 18 and above. The Company does not conduct training specific to forced labour or child labour, though it may consider doing so in the future.


8. Measuring Effectiveness

Policies to which GB Canada is subject are reviewed and updated periodically and appropriate modifications are made. GB Canada has not received any reports of complaints regarding forced labour or child labour, either directly or through its whistleblower line. The Company will consider and implement measures to assess the effectiveness of its policies and procedures as it continues to develop its program in this area.

9. 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.

I have the authority to bind Gold Bond Canada, Ltd.



Jeffrey D. Newton
Director
May 31, 2024