

**Miraclon Canada Inc.**  
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V5G4P5

## 2023 Compliance Report for Bill S-211

This report covers Miraclon Canada's 2023 annual compliance with Bill S-211 and outlines the steps the entity has taken during its previous 2023 financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.

### Miraclon's Entity Structure



Miraclon Canada Inc. meets the size related requirements under Bill S-211. Miraclon Canada Inc. is Miraclon's only Canadian entity and sells Miraclon's consumables and equipment to Canadian customers.

From an operational perspective, Miraclon's Global Headquarter is located in Belgium under the legal entity Miraclon Belgium BV (see chart above).

From a corporate perspective, all Miraclon global activities (i.e., from Miraclon Belgium, Miraclon US and Miraclon Japan) report to another Belgian legal entity, named MIR BidCo NV. Ultimately, MIR BidCo is owned by the UK based Private Equity Montagu.

Miraclon's factories for Flexo consumables are located in Weatherford, Oklahoma, USA and Yamanashi, Japan. Consumables are shipped through the different entities including Miraclon Canada Inc. to its end customers.

Equipment is purchased through third-party suppliers. Kodak is our Miraclon's main equipment supplier. Kodak manufactures the Flexcel NX imagers and laminators at KEPS in China. Other equipment is custom manufactured in Europe.

Miraclon develops software and equipment in Vancouver. One limited outsourced partner is used in Europe.

### **Miraclon's Compliance Focus in 2023**

Miraclon holds strong values which are reflected in Miraclon's corporate policies. Miraclon's corporate policies include the Global code of conduct. It clearly outlines that Miraclon takes a strong stand against forced or child labor. Every employee must take annual training to ensure all employees are aligned on our values and Miraclon monitors employees' completion of mandatory courses. It is also stressed that our suppliers need to be aligned with our code of conduct or follow their own code of conduct having similar values.

Furthermore, Miraclon is committed to the procurement of goods and services in compliance with all applicable laws and Regulations including Bill S-211, with our Global Code of Conduct and other Miraclon policies, and with best-in-class purchasing standards. Miraclon engages in procurement activities that respect human rights, protect the environment and achieve optimal value for the company regarding quality, price and service. We apply risk-commensurate control measures to mitigate the risks of error and fraud. In addition, Miraclon template purchase agreement includes specific clauses relating to compliance with all laws, including prohibition of forced labour or child labour; these clauses may not be amended without Miraclon's General Counsel & Compliance Officer review and Miraclon's Chief Operating Officer approval.

Supplier audits are a key tool to understand our suppliers practices. Forced or child labour are not acceptable to Miraclon and would be flagged in a supplier audit.

Another control measure in place is the annual Compliance Checklist and Audit. Andreas Albat, as Miraclon Canada's Director, provided the confirmation annually including 2023 that there were no violation to the applicable labour laws in Canada including Miraclon's code of conduct. Note that whistleblower policies and protection are in place as well. The Annual Compliance Checklist is also completed by all other Miraclon entities and key functions which includes Supply chain and procurement on a global basis. The supplier section of the Compliance Checklist also requires our manufacturing and supply chain leader to confirm that we are compliant with conducting proper due diligence checks with regards to new suppliers.

Within Miraclon, there are several ways for any employee or contractor in the world to report what she/he considers to be a non-compliance item: through direct report, HR, Compliance Officer or a 'whistle-blower' line managed by an independent third party service provider.



Montagu, the UK-based Private Equity which is the Ultimate Beneficiary Owner of Miraclon, requires on a yearly basis the completion by Miraclon of an ESG report, which includes question related to forced or child labour.

Miraclon also has a strong HS&E policy to protect its employees. Miraclon's management is expected to support employees (full-time and temporary), consultants and contractors, in their efforts to lead a healthy lifestyle. We provide our associates with safe working conditions and strive to protect them from potential health hazards and injuries.


Kodak is our key supplier for equipment and it has very similar corporate guidelines as Miraclon. Please note that Miraclon was spun out of Kodak in 2019. Kodak's corporate responsibility principles include that the Company's terms of employment are voluntary and the Company prohibits the use of child or forced labor of any kind.

Miraclon also adheres to the US legislation concerning the Uyghur Forced Labor Prevention Act (UFLPA) as part of its procurement and supply chain activities.

Miraclon HR team confirmed that we did not employ anyone in all or our entities including in its manufacturing facilities under the age of 18 in 2023. Note that we have offered high school students the opportunities to shadow Miraclon Employees as part of their high school career education.

#### **Report Approval by Miraclon Canada Inc.**

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, Andreas Albat, have the authority to bind Miraclon Canada Inc.



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Andreas Albat  
Director, Systems R&D and Director for Miraclon Canada Inc.  
May 17<sup>th</sup>, 2024