



## **Olin Canada ULC Forced Labour Report**

### **Who We Are**

Olin Canada ULC is an Unlimited Liability Corporation organized under the laws of Nova Scotia, indirectly owned by Olin Corporation's wholly owned entity, Olin North American Holdings, Inc. Olin Canada ULC wholly owns Pioneer Americas LLC (a subsidiary of Olin Corporation) and is also a 50% owner of CANSO Chemicals Ltd., a Nova Scotia Company.

### **What We Do**

Olin Canada ULC is a commodity chemical manufacturer, as well as an importer and distributor of ammunition, with less than 250 employees operating facilities at various locations within Canada. Olin Corporation, the owner of Olin Canada ULC, is a leading commodity chemical manufacturer and producer of small-caliber ammunition, operating under three business units, including Olin Chlor Alkali Products and Vinyls, Olin Epoxy, and Winchester. Collectively, Olin's business segments have approximately 7,400 employees with offices in 15 countries and customers in nearly 100 countries across the globe. Olin's compliance program and training activities apply to all of its wholly owned subsidiaries, including Olin Canada ULC. At Olin, our compliance program is guided by our core values – Act with Integrity, Drive Innovation and Improvement, and Lift Olin People. Inherent in these values is our commitment to responsible corporate citizenship and the respect for and advancement of human rights across the globe.

### **Our Supply Chains**

The production of chlor alkali products primarily relies upon three main inputs, salt, water, and electricity. All of these inputs are primarily sourced within Canada or from Olin's affiliates in the United States. Olin Canada ULC primarily sources its ammunition imports from its affiliate in the United States, Olin Winchester, LLC; however, a small portion of Olin Canada ULC's supply chain may include other Olin affiliates or entities outside of the United States or Canada.

### **How We Work to Ensure Our Supply Chains Are Free of Forced Labour and Child Labour**

The Olin Human Rights Policy is informed by the UN Guiding Principles on Business and Human Rights and the human rights principles encompassed in the Universal Declaration of Human Rights, the International Bill of Human Rights, and the International Labour Organization's 1998

Declaration on Fundamental Principles and Rights at Work. The Olin Human Rights Policy is endorsed by Olin's Board of Directors and Chief Executive Officer. Every Olin employee worldwide is empowered with the responsibility to ensure that our actions and intentions uphold our values. Within our annual Code of Conduct training, Olin employees reaffirm their commitment to our policies.

## 1. Our Policies

Olin Corporation's policies and Code of Conduct are applicable to Olin Canada ULC. Olin's commitment to maintaining a responsible supply chain is embedded in Olin's [Code of Conduct](#), its [Human Rights Policy](#), its [Disclosure Statement for the California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act of 2015](#), and its [Business Partner Code](#). The Code of Conduct and Human Rights Policy state that as part of its commitment to good business practices worldwide, Olin will uphold individual human rights in all of its operations. Olin's Code of Conduct also indicates that Olin conducts all of our operations in compliance with all applicable laws and requirements and in a manner that protects the health and safety of our employees and everyone in the communities where we operate and where we dispose of waste materials. It is Olin's value that all peoples be respected. The Code of Conduct expressly states Olin has a zero-tolerance policy for the use of forced labour and human trafficking. Moreover, within its supply chain, Olin has adopted a Business Partner Code setting forth Olin's expectation that its suppliers, distributors, and other business partners will uphold all applicable laws and regulations, including those prohibiting the use of forced labour and human trafficking. Furthermore, as a U.S. Government contractor, Olin has a Winchester division-specific policy further emphasizing that its employees may not engage in human trafficking or use forced labour in the performance of any U.S. government contracts.

## 2. Our Due Diligence Processes

In order to verify compliance with laws, Olin takes a risk-based approach. Olin subjects all vendors and customers to automated screening as part of its Global Trade Systems (GTS) application. Olin also conducts additional due diligence on certain business partners, including a number of suppliers and distributors, based on their geographic location and scope of work for Olin. Olin's Ethics and Compliance group oversees this due diligence process. Olin conducts periodic risk assessments, which have included employee survey questions about observing human trafficking. At no time in the past

year has Olin or Olin Canada ULC had any reason to suspect the existence of exploitative practices (modern slavery, child labour, or trafficking) in any of Olin's businesses. Consequently, Olin believes the risk of such practices by any of its business partners is very low, and Olin has not taken nor does Olin at this time propose to take any specific action to investigate its business partners in this regard beyond its normal third-party due diligence and supplier approval processes. If Olin's experience or perception of the extent of that risk changes, then this position will be revisited.

### **3. Employee Training on Forced Labour and Child Labour**

Olin Canada ULC conducts annual training on its Code of Conduct, which varies from year to year whether it is in-person workshops or online computer training. Through these forums and on an annual basis, employees must acknowledge compliance with the Olin Code of Conduct. Olin's value of Olin People, which includes Olin's respect for the rights, cultures, nationalities, and races of all people with whom Olin interacts, is specifically highlighted in the annual Code of Conduct training. Due to government contract requirements, live workshop training specifically covering Olin's zero tolerance of forced labour and human trafficking has been conducted for certain, targeted personnel at Olin Winchester, LLC, Olin Canada ULC's primary supplier of ammunition products.

### **4. How We Monitor Ourselves and Our Suppliers and Assess Effectiveness**

Violations of Olin's Code and Policies may be reported via Olin's [Help-Line](#), including any violations pertaining to Olin's Human Rights Policy by any Olin Canada ULC employee, customer, or supplier. All reports to the Olin Help-Line are evaluated, investigated, and addressed by Olin's Ethics and Compliance Office. Olin's Board has oversight of Olin's risk profile and risk management process and has responsibility for satisfying itself that the risk management processes designed and implemented by management are functioning effectively including Olin's Enterprise Risk Management (ERM) organization, Code of Conduct and related compliance program, internal control function and disclosure committee meetings and controls, and a robust internal audit function.

When Olin's risk assessment process identifies the risk of forced labour or human trafficking by existing or prospective business partners, Olin personnel may undertake additional verification efforts using all appropriate resources, including performing audits; however, at this time Olin has not taken nor does Olin propose to take any

specific action to investigate any business partners in this regard beyond its normal due diligence and supplier approval process.

### **We Are Aware of Risks of Forced Labour or Child Labour Use in Global Supply Chains**

We will not knowingly conduct business with any organization involved in forced labour or human trafficking. Our Business Partner Code of Conduct outlines our expectations and requirements to ensure all organizations with whom we do business also adhere to a zero-tolerance policy. Olin Canada ULC's supply chain has a very low risk of forced labour or child labour being used as most resources are sourced from within Canada or from an Olin affiliate. Although Olin Canada ULC believes this risk to be low, Olin Canada ULC's supply chain may include importation of some products from affiliates or other entities in higher risk countries, such as China.

### **How We Have Addressed Reported Risks or Use of Forced Labour or Child Labour our in Supply Chains**

To date, Olin Canada ULC has not faced situations of forced labour or child labour and has therefore not had to remedy and rectify such situations.

### **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.

Full name: Brett A. Flaughter

Title: Vice President

Date:

8/24/24

Signature:



I have the authority to bind Olin Canada ULC.