

Fighting Against Forced Labour and Child Labour in Supply Chains Act

Reporting Year: 2023

Entity: Panolam Industries International Inc.
2 Corporate Drive, Suite 946
Shelton, CT 06484

Structure: Panolam Industries International, Inc. is the corporate entity for Pioneer Plastics Corp, and Panolam Industries Ltd. This report covers the annual Fighting Against Forced Labour and Child Labour in Supply Chains Act report for Panolam Industries International Inc. excluding the Panolam Industries Ltd. facility. The Panolam Industries Ltd. operation has been submitted under a separate report as it physically resides in Canada.

Activities: Panolam Industries International Inc. is a decorative surfaces manufacturer. Its subsidiary Pioneer Plastics manufactures high pressure laminate as well as polyester and melamine resins and treated paper in its US based facilities. The company manufactures fiberglass panels in the US as well. The Panolam Industries Ltd, entity manufactures particleboard and TFL laminated panels at its Huntsville, ON Canada facility and also coats paper with amino resins which are used both internally in the TFL panel production and sold into the market.

Supply Chains: Panolam Industries International, Inc. and its subsidiaries are committed to conducting business in a lawful, ethical, and responsible manner and require its suppliers to meet similar standards.

The primary raw materials used in the Panolam US facilities are paper products and resins/chemicals used in the HPL manufacture, paper treating and resins production operations. The bulk of the materials used in the HPL and paper treating operations are sourced from North American suppliers. The resins manufacture operation relies on material supplies from North American as well as international suppliers.

Organization Policies and Due Diligence for Forced or Child Labour:

The company currently relies on the use of reputable suppliers to ensure that proper work/labour practices are being used. This is conducted through financial reviews and reviews of readily available documentation on the companies. A supplier survey is currently being developed to provide additional information to be used in the risk assessment.

With regards to specific raw materials, the company is currently certified by the Forest Stewardship Council (FSC®) for the production of its wood/paper based products. As part of this certification the facility is annually audited through self-assessment or third-party inspections that the facility complies with the ILO Core Labour requirements which include Forced Labour and Child Labour Practices. All of the paper suppliers, which are the primary components of the HPL and treated papers, are also FSC certified which means they are also subject to the ILO Core Labour practices.

Source of Potential Risk: At present no sources of potential risk have been identified in the company's supply chain. The facility will continue to review new suppliers that may be added to the supply chain to ensure that they comply with Canadian requirements.

Remediation Measures: At present there are no remediation actions required to be taken based on the preliminary risk assessment. If in the future a risk is determined, then actions will be taken which may include alternative sourcing depending on the level and type of risk.

Remediation of Loss of Income to Vulnerable Families: As indicated above, at this time no risk has been identified so remediation is not required.

Training: All of the company purchasing representatives and applicable employees receive training for the FSC certification program which includes the requirements of the ILO Core Labor practices which specifically include both forced and child labour. This training is audited by a third part auditor for the FSC program on an annual basis.

Review of Effectiveness: This program will be reviewed on an annual basis, at a minimum to ensure that compliance is maintained. This will include a review of the supply chain.

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 Panolam Industries International, Inc.



Date: May 10, 2024

Peter Jones
CEO