



R.T. Vanderbilt Holding Company, Inc.

INDUSTRIAL MINERALS AND CHEMICALS

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The purpose of this report is to provide the policies and procedures followed by RT Vanderbilt Holding Company, Inc. (Vanderbilt) during calendar year 2023 to help prevent and reduce forced labor.

Vanderbilt Chemicals, LLC and Vanderbilt Minerals, LLC are wholly owned subsidiaries of Vanderbilt. Vanderbilt is engaged in the manufacturing and resale of industrial chemicals and minerals. This is a joint report for both Vanderbilt Chemicals, LLC (Business Registration number - [834288649RM0001](#) and Vanderbilt Minerals, LLC (Business Registration number - [837585736RM0001](#)).

Annually, we provide a Risk Assessment of our supply chain which includes the following:

- Risk Assessment - Monitor cargo flow, identify business partners, and analyze external threats against the company procedures. This step includes mapping supply chains/cargo flow and identifying risk areas, including forced labor.
- Threat Assessment: Assign risk ratings to partners based on conditions in partner's country/region which may foster supply chain security threats, including forced labor.
- Vulnerability Assessment: Analyze business partners against the minimum-security criteria for their industry and address identified vulnerabilities.
- Action Plan: Prepare an action plan based on the level of risk business partners bring into the supply chain, which includes implementing procedures and/or improvements to adequately address risks.
- Audit: Conduct internal self-assessment on the Action Plan.

Vanderbilt has policies and procedures addressing forced labor and child labor, including the Supplier Code of Conduct and policies and procedures in compliance with labor laws. Due diligence processes are a part of the Annual Risk Assessment described above. We import certain raw and resale materials from vendors in other countries. The risks associated with these imports are determined and addressed using the Risk Assessment process described above.

Employees are provided training as applicable to their job functions. Forced labor awareness training is provided to our executive staff, Human Resource, and employees with supply chain job functions, such as Purchasing Department, Trade Compliance Department, and Risk Department.

Historically and in 2023, we have not identified any forced labor or child labor in our activities and supply chains. Each year, Vanderbilt will continue to monitor and adhere to the guidance provided in Canada's new forced labor reporting Act.

Michael Cafarchio

Vice President – Controller