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01-April-2024

## **Bill S-211 Annual Report for Reynolds Consumer Products Canada Inc. Reporting Year: 01-Jan through 31-Dec 2023**

Steps taken in the previous financial year (2023) 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.

- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Developing and implementing an action plan for addressing forced labour and/or child labour
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- Developing and implementing anti-forced labour and/or -child labour contractual clauses
- Auditing Suppliers
- Monitoring Suppliers
- Developing and implementing training and awareness materials on forced labour and/or child labour
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

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- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour

Additional information describing the steps taken to prevent and reduce the risks of forced labour and child labour.

- Training in indications of forced/child labor
- Revising vendor audit criteria to clearly interrogate forced/child labor
- Developed plan and obtained contract with third party for all supplying manufacturers to be audited to the SM ETA standard. Implementing in 2024

Explanation of Reynolds' structure, activities and supply chains.

Reynolds Consumer Products Canada Inc. ("RCP Canada"), a wholly-owned subsidiary of Reynolds Consumer Products Inc., specializes in manufacturing and selling aluminum foil and parchment products, primarily under the Reynolds and Alcan brands. RCP Canada also engages in resale of imported products in the tableware and wastebags categories under the Hefty brand.

The company operates out of Mississauga, Ontario, and its Toronto plant boasts significant production capabilities, including millions of pounds of aluminum foil products annually. RCP Canada's competitive advantages lie in local manufacturing and offering a diverse product range to customers in single orders.

In its supply chain, RCP Canada sources materials both locally and internationally. The company engages in both manufacturing and resale, with quality control for its products managed in-house at the Toronto facility. Sales and marketing efforts are focused within Canada, targeting major retailers.

RCP Canada's distribution system is optimized through automated inventory and sales forecasting systems, facilitating efficient order placement and management. The company also handles administrative functions, including finance and HR, tailored to Canadian regulations, with IT services centralized under Reynolds Consumer Products LLC, which is also a subsidiary of Reynolds Consumer Products Inc. This structured approach to manufacturing, sales, distribution, and administration supports RCP Canada's position in a competitive market, emphasizing efficiency, local production advantages, and customer service.

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The following elements of due diligence are implemented in relation to forced labour and child labour.

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing, or mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate

Policies and due diligence processes in relation to forced labour and child labour.

- Contracts state expectations of suppliers to provide freely chosen employment, absent of discrimination, and free of bonded and child labour
- On-site audits to verify and validate proper practices.

Areas identified as potential risks of forced labour and child labour in the supply chain.

- Locations of activities, operations, and factories
- Tier one (direct) suppliers
- The use of outsourced, contracted, or subcontracted labour
- The use of migrant labour

Remediation of forced labour or child labour and consequential loss wages.

- Neither forced labour nor child labour were identified in our activities and supply chains.

## Employee Training

Training is mandatory for employees making contracting or purchasing decisions and managing contracted manufacturers.

Training includes:

- All elements of the ETI Base Code
- Specific US laws and regulations related to ethical treatment.

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Methods to assess effectiveness

- Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour
- Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses
- Partnering with an external organization to conduct an independent review or audit of the organization's actions

Corporate structure to ensure forced labour and child labour are not used in activities and supply chains.

- Global Quality responsible for monitoring, enforcing compliance, and improving ethical and social standards and employee safety with outside manufacturers against Reynolds' requirements. Cross-functional teams used to collaborate with Global Commercialization, Procurement, and Legal & Regulatory.
- Global Commercialization responsible for identifying sourcing and developing contracts with manufacturers of finished goods.
- Procurement responsible for identifying sourcing and developing contracts with manufacturers of semi-finished goods.
- Legal and Regulatory responsible for legality of both products and the manufacturing entities.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I 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.

Respectfully,

DocuSigned by:  
  
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David Watson  
General Counsel  
Date: 2 April 2024