SONGWON International – Americas Inc.
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CANADIAN MODERN SLAVERY ACT ATTESTATION

SONGWON Industrial Group ("SONGWON") prioritizes ethical business conduct in its own operations and supply chains and is strongly opposed to all forms of human rights abuses, including forced and child labor.

The following attestation is made pursuant to Section 11 of the Canadian Modern Slavery Act, section 54(1) of the UK Modern Slavery Act 2015, and the California Transparency in Supply Chains Act. This attestation covers the 2023 financial year.

SONGWON publicly pledges, consistent with its Code of Conduct and Labor and Human Rights Policy, to seek to protect the dignity and values of all stakeholders. To that end, SONGWON has dedicated significant resources to strengthening its human rights compliance systems to create a safe and healthy organizational culture for its employees and those supporting its supply chains. Through its commitment to supporting the United Nations' Sustainable Development Goals and similar global and country specific initiatives, SONGWON strives to operate in a way that is responsible toward society and the environment.

To that end, in 2022, SONGWON conducted an in-depth analysis of its supply chain with the support of outside counsel, evaluating its potential exposure to forced labor. In 2023, it continued to work with suppliers previously analyzed by outside counsel. It intends to update its supplier review in 2024.

I. BACKGROUND

In accordance with Section 11(3)(a), SONGWON provides the following information related to its structure, activities, and supply chains.

SONGWON is a South Korean industrial supplier of chemical products for a wide variety of sectors and industries, including the packaging, automotive, building & construction, agriculture, textiles and fibers, wire and cable, coatings, adhesives, durable & consumer goods, lubricants, and electric and electronic industries. SONGWON operates in 10 countries worldwide,

employing 944 persons. While SONGWON does not maintain a physical presence in Canada, it imports goods into the country for further sale and distribution and understands that it is subject to the Canadian Modern Slavery Act.

The majority of SONGWON's products are manufactured in South Korea and are of South Korean origin. SONGWON sources the materials for these products globally, including from Japan, Singapore, Taiwan, India, Vietnam, Thailand, Europe, North America and China.

II. ACTIVITIES, INTERNAL POLICIES, AND DUE DILIGENCE PROCESSES

Background

In accordance with Section 11(3)(b), SONGWON provides the following information related to its structure, activities, and supply chains.

SONGWON requires that its employees comply with all applicable laws, including those supporting fair labor standards. SONGWON's Human Rights and Labor Policy requires strict compliance with all relevant labor laws, as well as a general policy to not employ children under the age of 15. Per this policy, minors under the age of 18 are not permitted to engage in hazardous work.

SONGWON also publicly commits to work only with supply partners that abide by the highest social, ethical and environmental performance and safety standards. SONGWON evaluates suppliers' sustainability performance based on key factors such as labor laws, EH&S, human rights, and business ethics.

SONGWON conducts periodic audits and on-sight of suppliers by SONGWON personnel for a variety of compliance and quality assurance reasons, including any indications of trafficking, slavery, and forced labor in supply chains, a practice that the company intends to enhance in the coming year. SONGWON also requires certain suppliers in high-risk jurisdictions to certify that they follow all applicable laws and regulations. This effort by SONGWON includes questionnaires to assess whether suppliers monitor, manage, and mitigate risks of slavery and human trafficking in their own supply chain.

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Comprehensive Review of Supply Chain

In accordance with Sections 11(3)(b) and (c), SONGWON provides the following information related to its policies and due diligence processes, as well as its analysis of its own supply chain.

In 2022, SONGWON undertook a comprehensive review of its supply chain to assess its potential exposure to forced labor. SONGWON engaged outside legal counsel to assist in tracing its products and precursor components, seeking to assess its supply chain to its roots. Throughout this review, SONGWON identified all the precursor chemicals that are incorporated into the specialty chemicals destined for the North American market. SONGWON found that a majority of these pre-cursor chemicals originated in South Korea, with significant amounts also stemming from Taiwan, Thailand, Germany and mainland China. The precursor chemicals were supplied either by distributors or directly by manufacturers. Where the inputs were supplied by distributors, SONGWON also identified the name and address of the manufacturer. SONGWON evaluated original documents relating to these products, including invoices, country of origin information, shipping documents, certifications and distributor/supplier information. When suppliers repeatedly failed to respond to document requests, SONGWON ultimately terminated the relationship.

SONGWON ultimately determined that one manufacturer in its supply chain was at risk of exposure to forced labor because it maintained manufacturing facilities in the Xinjiang Uyghur Autonomous Region of China (XUAR), which the United Nations, Canada and the United States have identified as a region at high risk of forced labor. Although SONGWON's review did not indicate that this or any other source in its supply chain derived from forced or child labor, SONGWON terminated the relationship with the XUAR supplier out of an abundance of caution and identified alternative sources.

In accordance with Sections11(3)(d)-(e), SONGWON notes that because it does not believe that any forced or child labor has appeared in its supply chain, it has not engaged in

remediation measures.

III. CONTINUED DEDICATION TO PREVENTION OF FORCED LABOR AND CHILD LABOR IN SONGWON'S SUPPLY CHAINS

In accordance with Sections 11(3)(b), 11(3)(f), and 11(3)g), SONGWON provides the following information related to its ongoing diligence, the training it provides to its employees, and its ongoing assessment of its efforts to prevent forced and child labor in its supply chain.

SONGWON conducts regular ethics training for all employees with the aim of meeting its Code of Conduct and is in the process of expanding training to meet evolving SONGWON policies and to include additional procurement-specific modules on human trafficking, slavery, and forced labor, with an emphasis on how to mitigate such risks within SONGWON's supply chain.

SONGWON also seeks to remain aware of changing industry trends which might highlight high-risk components and products or high-risk jurisdictions. Finally, since conducting the 2022 assessment, SONGWON has onboarded new suppliers. As noted above, SONGWON requires all suppliers to comply with its external Code of Conduct, which includes a prohibition on engaging in forced or child labor. SONGWON intends to refresh its supply chain analysis in 2024 and has taken necessary steps with outside counsel in order to do so. It will use this analysis to analyze its effectiveness in ensuring that no forced or child labor is being used in its supply chain.

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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.

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ByungSoo Boo

Byungsoo Boo

Leader Operations
SONGWON Industrial Co. Ltd.

I Byungsoo Boo, confirm that I have the authority to bind SONGWON.