

JOINT REPORT UNDER THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

Financial Reporting Year: 1 July 2022 to 30 June 2023

Reporting Entity Information

Organization Name : **Beneco Packaging**
Sector/Industry : Printing and manufacturing of Folding Cartons

Legal Name of Reporting Entities

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| 1. Sheen Legend Packaging Corporation 3640 McNicoll Ave, Scarborough, ON, M1X 1V5 | 2. Beneco Packaging Corporation 520 William St, Cobourg, ON, K9A 3A5 |
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1 Purpose

This report, prepared pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “Act”), pertains to Sheen Legend Packaging Corporation (Scarborough plant) and Beneco Packaging Corporation (Cobourg Plant).

The entities mentioned above hereby submit a report to the Minister of Public Safety and Emergency Preparedness regarding the measures undertaken during their previous financial year, spanning from July 1, 2022, to June 30, 2023. These measures aim to prevent and mitigate the risk of forced labor or child labor in the production of paperboard folding cartons within Canada or in goods imported into Canada.

2 Measures to Prevent and Reduce the Risks of Forced Labour and Child Labour

Sheen Legend Packaging Corporation and Beneco Packaging Corporation have implemented policies and procedures aimed at preventing and mitigating the risks of forced labor, child labor, and human trafficking within operations. Both entities have taken below steps to prevent and address forced labor and child labor:

Both entities have developed and implemented due diligence policies and processes for identifying, addressing, and prohibiting the use of forced labor and child labor within their activities and supply chains. Both organizations firmly oppose the exploitation of child labor under any circumstances, aligning their stance with the UNICEF Convention on the Rights of the Child. Guided by the Children’s Rights and Business Principles as a fundamental framework for operationalizing their commitment to upholding and supporting children’s rights, they expect their suppliers to demonstrate the same dedication.

Both entities require their suppliers to implement policies against forced labor and child labor as part of their supplier approval process. This mandate is integrated into the Supplier Code of Conduct and monitored through continuous engagement and performance evaluations. Actively monitor suppliers to ensure compliance with labor standards and identify any potential risks of forced labor or child labor.

Developed and implemented grievance mechanisms to provide channels for all employees and stakeholders to report any instances of forced labor or child labor, ensuring that concerns are addressed promptly and effectively.

Both companies have developed and implemented training and awareness materials specifically focused on forced labor and child labor, ensuring that employees at all levels are equipped with the knowledge and understanding necessary to identify and address these issues within the organization and its supply chains.

Through these comprehensive measures, Sheen Legend Packaging Corporation and Beneco Packaging Corporation are actively working to prevent and address forced labor and child labor within their operations and supply chains, demonstrating their commitment to ethical business practices and respect for human rights.

3 Structure, Activities, and Supply Chains

Sheen Legend Packaging Corporation (Scarborough plant) was established in July 2004, and Beneco Packaging Corporation (Cobourg Plant) was established in August 2022. Both entities operate as separate legal entities within the paperboard folding cartons manufacturing sector. Both entities operate under the trade name "Beneco Packaging" streamlining branding and market presence while maintaining distinct legal identities. Managed by a unified management team, including corporate positions outlined in the organization chart, overseeing operations at both locations. In total, Beneco Packaging employs 74 full-time employees, all based in Canada, across both plants.

Specializing in the production and manufacturing of paperboard folding cartons, Sheen Legend Packaging Corporation and Beneco Packaging Corporation serve various industries, including Food, Industrial, and Cosmetic sectors. The production process encompasses sheeting, lithographic printing, platen die-cutting, and in-line gluing, with the Cobourg plant additionally equipped for foil stamping and the Scarborough plant capable of windowing.

The supply chains of Sheen Legend Packaging Corporation and Beneco Packaging Corporation encompass suppliers of raw materials, equipment, and services required for the production of paperboard folding cartons. These include but not limited to paperboard suppliers, ink, coating, glue, window film, foil film, and corrugated boxes suppliers. These supply chains include both direct and indirect suppliers, both within North America and internationally. The entities aim to ensure that their supply chains adhere to ethical labour practices and do not involve forced labour or child labour.

4 Policies and due diligence processes

Beneco Packaging Corporation upholds a strong commitment to Responsible Business Conduct (RBC) by embedding it into our policies and management systems. Our procurement program, overseen by senior management and business manager, ensures strict adherence to labour laws, safe working conditions, and equitable wages by all our suppliers. We vehemently oppose any involvement in forced or child labour, prioritizing human rights respect and avoiding violations. Our suppliers are required to sign Beneco Packaging's Supplier Code of Conduct, which explicitly prohibits exploitative child labour

and mandates compliance with legal age standards. We maintain comprehensive records of workers' ages to ensure compliance and eradicate child labour from our supply chain.

Furthermore, Beneco Packaging has a strict policy against forced labour, slavery, or human trafficking, providing avenues for employees to voice concerns anonymously. We conduct periodic assessments to prevent forced labour and ensure ongoing compliance with Canadian and Ontario legislation, including the Employment Standards Act.

As part of our commitment to ethical labour practices, we provide regular Awareness Training on child labour and forced labour to all employees. This training reinforces our dedication to protecting the welfare of children and upholding ethical labour practices. We are proud to note the absence of individuals under the age of 18 in our workforce, affirming our unwavering stance against forced labour and human trafficking.

5 Forced Labour and Child Labour Risks

Sheen Legend Packaging Corporation and Beneco Packaging Corporation are committed to rigorous adherence to the Act's mandates, ensuring thorough identification and mitigation of potential forced labour and child labour risks within our operations and supply chains. Recognizing the inherent challenges across sectors, our reporting underscores our unwavering dedication to ethical standards and transparency.

Utilizing comprehensive supply chain mapping, meticulous risk assessments, and robust policy frameworks, we diligently mitigate potential risks and uphold stringent compliance with ethical labour practices. Our extensive employee training programs, meticulously crafted in-house, empower our workforce to swiftly identify and report any instances of concern. Moreover, our commitment extends to entities under our purview, fostering a culture of accountability and transparency throughout our organizational ecosystem.

While steadfastly upholding privacy and legal considerations, our reporting serves as a testament to our unwavering resolve in combating forced labour and child labour. Through transparent communication and a relentless pursuit of continuous improvement, we endeavor to uphold the highest ethical standards, safeguarding the well-being of all individuals within our operational sphere and supply chains.

6 Remediation measures and Remediation of Loss of Income

Sheen Legend Packaging Corporation and Beneco Packaging Corporation rigorously adhere to Canadian and Ontario laws, notably the Employment Standards Act, to prevent child labour, forced labour, and human trafficking within their operations and supply chains. Both companies provide anonymous reporting channels for employees to voice concerns, demonstrating their commitment to fostering a safe and ethical work environment. They affirm the absence of any incidents of forced labour or child labour in their activities or

supply chain in the last financial year, obviating the need for remediation measures. However, they pledge to consider appropriate remediation strategies in compliance with international standards should any incidents arise in the future.

7 Training

Sheen Legend Packaging Corporation and Beneco Packaging Corporation place a high priority on addressing forced labour and child labour by conducting thorough annual awareness training sessions for all staff members. These training sessions, which last around 30 minutes each, are developed internally with input from Human Resources and management, forming an integral part of the yearly refresher program. Even new hires undergo this training, ensuring that all employees possess the requisite knowledge and comprehension of ethical labour practices. Moreover, quizzes are administered at the conclusion of each training session to gauge its efficacy.

8 Assessing effectiveness

The HR and Management team at Beneco Packaging Corporation annually monitor the effectiveness of actions taken to prevent child labour, ensuring ongoing compliance with ethical labour practices. They also conduct periodic assessments to evaluate the efficacy of measures implemented to prevent forced labour. Additionally, annual reviews of established policies and procedures reinforce the company's commitment to maintaining a safe work environment.

After each annual employee training session on child labour and forced labour awareness, the effectiveness of the training is evaluated through Training Quizzes. Furthermore, the management team rigorously reviews suppliers as part of the approval program, examining measures taken to prevent forced labour and child labour. These steps ensure ethical standards are upheld throughout the supply chain, reaffirming Beneco Packaging's commitment to combating child labour and forced labour.

9 Attestation

This report was approved by the Management team of Sheen Legend Packaging Corporation and Beneco Packaging Corporation.

In compliance with the Bill S-211, specifically Section 11, I hereby confirm that I have reviewed the information presented in the report for the entities listed above. To the best of my knowledge, and after conducting due diligence, I certify that the information in this report is true, accurate, and complete in all material aspects for the purposes of the Act, for the reporting year indicated above.



Ms. Yajun Jiang

President

Sheen Legend Packaging Corporation

Beneco Packaging Corporation

I am authorized to represent and bind Sheen Legend Packaging Corporation and Beneco Packaging Corporation.

Date : 10 April,2024