

REPORT REGARDING FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

This report is provided by Central National Gottesman Inc. (“CNG”), on its own behalf and on behalf of its subsidiaries Spicers Canada ULC and Central National Canada ULC pursuant to Chapter 9 of the Statutes of Canada 2023, Part 2, Section 11 of Bill S-211, *An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff* (the “Act”). This constitutes their report to the Minister on the steps taken during the fiscal year ending December 31, 2023 to prevent and reduce the risk that forced labour or child labour is used in the production of goods imported into Canada by CNG or any of its subsidiaries or divisions.

Our principal suppliers, representing the bulk of products purchased by the CNG Group by dollar amount, are large, heavily regulated manufacturers and distributors. We collaborate with our suppliers on an ongoing basis and they certify compliance with a zero tolerance policy against violations of any applicable laws regarding human trafficking, forced labour, child labour, or other forms of modern slavery across supply chains. These suppliers have established compliance mechanisms and strong reputations in the industry.

Our most salient risks regarding forced or child labour in our supply chain are with smaller manufacturers and suppliers, and to mitigate this risk all suppliers are required to acknowledge and adhere to our Supplier Code of Conduct, which, among other things, requires that all suppliers comply with the CNG Group’s policy against forced labour and child labour and provides us with audit rights to review suppliers’ facilities for compliance.

The attached Central National Gottesman Inc. Policies and Procedures Regarding Modern Slavery and Forced and Child Labor is incorporated herein by reference and made a part of this report.

For the current reporting period, CNG has not become aware of any instances of forced or child labour in our own operations or those of our suppliers so remediation has not been required.

This Report is made in accordance with Section 4(b)(ii) of the Act and was approved by the Board of Directors of CNG on April 9, 2024.

Signed: 

Andrew Wallach
President, Chief Executive Officer and Director



Central National Gottesman Inc.

Policies and Procedures Regarding Modern Slavery and Forced and Child Labor.

Our Business. Central National Gottesman Inc. (together with its subsidiaries, divisions and affiliates, the “CNG Group”) sells, markets and distributes paper, pulp, packaging, tissue, metals, wood products and office supplies worldwide. The CNG Group conducts business in over 100 countries around the world. The CNG Group strictly condemns and prohibits any form of forced or child labor or slavery.

Supply Chain and Due Diligence. We collaborate with our suppliers on an ongoing basis to establish compliance with a zero tolerance policy against violations of any applicable laws regarding human trafficking, forced labor, child labor, or other forms of modern slavery across supply chains. All suppliers are required to acknowledge and adhere to our Supplier Code of Conduct, which, among other things, requires that all suppliers comply with the CNG Group’s policy against forced labor and child labor and provides us with audit rights to review suppliers’ facilities for compliance.

Code of Conduct. We are committed to acting ethically and with integrity and transparency in all business dealings. We adhere to a code of business ethics (our “Code of Conduct”) and uphold internationally accepted human and labor rights across our operations in alignment with the Protocol of 2014 to the ILO Forced Labor Convention, 1930. We provide safe, healthy and rewarding workplaces for our employees and act as a responsible neighbor supporting communities in which we operate. Our management teams are dedicated to ensuring the ongoing zero tolerance policy against modern slavery within our operations globally as well as training all employees to identify and support eradication of modern slavery, human trafficking and child labor across our supply chain. Both management and non-management employees in our supply chain and procurement functions receive periodic refresher training.

All employees are encouraged to report any concerns with respect to potential violations of our Code of Conduct. Employees may report such concerns to our senior management and legal counsel directly or through an anonymous global hotline that is accessible via telephone or web application and is available in local languages for each country in which the CNG Group operates.

If any potential abuse is reported with respect to forced or child labor in our supply chain, we will work with the applicable supplier to remediate such noncompliance, and if the supplier fails to promptly remediate, we will terminate such supplier. If any potential abuse is reported with respect to forced or child labor in our own operations, subject to the provisions or requirements of local law, any CNG Group employee found after investigation to have engaged in forced or child labor will be subject to immediate termination of employment.

Signed: Andrew Wallach

Andrew Wallach
President, CEO & Director