

May 29, 2024

Government of Canada

Minister of Public Safety and Emergency Preparedness

Report from Technical Adhesives Ltd concerning Forced Labour in Canadian Supply Chains, Fiscal 2023

Technical Adhesives Limited (as well as our associated company, Technical Adhesives USA LLC) is an industrial adhesive manufacturer. The adhesives are made by combining many different chemical components to achieve the desired properties for the many specific application and performance requirements. Since there is limited suitable domestic chemical manufacturing, these chemicals are primarily sourced and purchased from American and other global manufacturers. Some manufacturers sell directly to Canada while others use distribution agents to warehouse and sell them here.

With the introduction of Bill S-211, Technical Adhesives established a formal section of the company code of conduct specifically related to forced labour and child labour concerns. Each employee was provided with a copy of this code to understand the company position and offered the opportunity to share their input. Signed acknowledgement was requested from each employee to confirm their awareness and responsibility. These declarations are kept on file.

In addition, Technical Adhesives approached the appropriate representatives from the chemical manufacturers of all of our adhesive ingredients to get confirmation that they comply with the current requirements and spirit of the Canadian forced labour laws. They have been requested to return signed documentation we called a *Supplier Code of Business Conduct* to that effect for our records. We keep these declarations on file too.

Having put our suppliers on notice of our need for compliance with our code of conduct we are anticipating that they are considering and assessing the possibility and therefore the avoidance of forced labour or child labour to be used in their operations. In good faith, after signing the acknowledgement, TAL is expecting our suppliers to comply with the restrictions on the use of forced labour and child labour as described in our code of conduct.

It is too early in the process to reasonably assess the effectiveness of our efforts. The concerns have been shared and awareness made. The impact will be realized in time.

For reference, copies of Technical Adhesives Code of Conduct and the Supplier Code of Business conduct have been attached.

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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."

I have the authority to bind Technical Adhesives Ltd.

Sincerely,

Sean Gogarty, B.Sc. Procurement Manager (Health & Safety Coordinator)





Technical Adhesives Code of Conduct

Technical Adhesives LTD. And Technical Adhesives USA LLC referred to as "Technical" are committed to the highest standards of social and environmental responsibility and ethical conduct.

Technical's Ethics Guide ("Ethics Guide"), which is available in English, French and Spanish languages, is the primary policy on workplace practices, human rights, health and safety and ethical conduct. It applies to all employees, directors, and officers of Technical. Prior to employment, new employees must read, understand, and comply with this Ethics Guide. Failure to comply with these principles may result in disciplinary action, up to and including termination.

The Ethics Guide outlines Technical's expectations on various ethical issues and provides guidance on ethical decision-making. It also provides additional resources to help employees make ethical decisions and maintain Technical's reputation for high ethical standards. Managers must also promote an environment that invites open and honest communication, which includes supporting any employee who brings forward a concern to be discussed and ensuring that no employee suffers retaliation for doing so.

ETHICS OPEN DOOR POLICY

Technical has adopted an open-door policy to establish a work environment where employees can feel free to share ideas, ask questions and share concerns. Each employee has the responsibility to promptly report any violation or potential violation of this Ethics Guide, including those related to forced and child labour, to a supervisor, local management team member or Human Resources representative.

Technical prohibits retaliatory action against employees who report or inquire in good faith about ethical issues or concerns.

As a global company, Technical does business with suppliers from many countries of diverse cultural, social, and economic circumstances. In selecting suppliers, Technical tries to identify reputable suppliers that provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices wherever they produce products for Technical. Technical endeavors to work with suppliers that demonstrate a willingness and ability to conduct their business in conformity with all applicable legal requirements and ethical standards. At a minimum, Technical requires that all suppliers meet standards set out in this Code of Conduct. Where applicable local laws impose greater obligations on a supplier, the supplier must comply with any such local laws.



SUPPLIER REQUIREMENTS

Technical's purchase contracts explicitly require its suppliers to comply with all applicable laws and regulations of the countries in which the merchandise is manufactured or from which it is exported. Company contracts also require all suppliers to impose the same obligation on their contractors.

A failure by a supplier, or by one of its contractors, to comply with all applicable legal requirements will violate Technical's contract with the supplier, giving Technical the right to cancel the contract and seek compensation for any resulting expense or loss. Moreover, serious or repeated violations of such requirements by a supplier or its contractors will result in termination of the supplier's business relationship with Technical.

COMPLIANCE WITH LAWS

Technical expects its suppliers to fully comply with all applicable national and/or local laws and regulations, including but not limited to those related to labor, immigration, health and safety, environment, economic and trade sanctions, anti-bribery, and anti-money laundering. Suppliers are required to take all steps necessary to ensure legal compliance in the production of merchandise for Technical, the facilities in which production takes place and the performance of work conducted by their contractors.

Technical may visit a supplier's or a contractor's domestic or foreign facilities, to watch for and report any legal violations or questionable conduct to Technical's officers for follow-up and, when appropriate, corrective action.

Technical may require participation in a factory legal compliance survey program. Under this program, the suppliers that Technical intends to use must conduct a self-survey of key legal compliance and workplace safety issues and then submit to, if requested, an inspection by specially trained personnel and/or Technical's associates. If a deficiency is found, the factory is given 30 days to correct it. If it fails to do so, then Technical may cease to do business with this factory / supplier.



LABOR LAWS

Technical expects all its suppliers and their contractors (through monitoring or other means) to comply with applicable local labor laws.

Technical requires that its suppliers identify all of the factories and contractors, domestic or foreign, which they plan to use to produce merchandise and provide certification that each factory will operate in compliance with all applicable labor laws.

Technical will not accept merchandise or components produced in violation of labor laws. Technical will not hesitate to discontinue its relationship with any supplier that it determines lacks either the will or the ability to meet its expectations in this area.

FOREIGN SOURCING COMPLIANCE

To address issues of particular concern in the foreign (cross-border) sourcing of merchandise, Technical will not allow the importation of merchandise that:

- Does not have accurate country-of-origin labeling.
- Was manufactured with convict, forced, or indentured labor.
- Was manufactured with illegal child labor.
- Was manufactured in violation of any other applicable labor or workplace safety law or regulation.

For foreign-produced merchandise, Technical requires foreign suppliers to obtain the manufacturer's certificate that the merchandise was manufactured at a specified factory (identified by name, location, and country), that neither convict, forced, or indentured labor nor illegal child labor was employed in the manufacture of the merchandise, and that the merchandise was manufactured in compliance with all applicable labor and workplace safety law.

REGULAR INSPECTION AND CERTIFICATION BY SUPPLIER PARTNER

Suppliers shall designate one or more of its officers to inspect each of its facilities which produce merchandise sold to Technical. Such inspections shall be done on at least a yearly basis to ensure compliance with standards, terms and conditions set forth herein. The supplier officer designated to perform such inspection shall certify to Technical following each inspection that he or she performed such inspection and that the results are true and correct.



Approved by the Board of Directors of Technical Adhesives Ltd. on May 14, 2024. In accordance with the requirements of Canada's *Fighting Against Forced Labour and Child Labour in*

Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the 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.

Signed in Mississauga, May 14, 2024,

ALIMA Conrad Maziarczyk President

Armandina Maziarczyk Director



Supplier Code of Business Conduct

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MEMORANDUM OF UNDERSTANDING

As an officer of ______ ("Supplier"), a supplier of Technical Adhesives, I attest that Supplier has received, read, and understood the principles and terms described in this Supplier Code of Business Conduct and agrees and accepts to abide by the same.

Supplier understands that its business relationship with Technical is contingent upon Supplier being in full compliance with this Supplier Business Code of Conduct. Supplier further understands and agrees that failure by Supplier to abide by any of the terms and conditions stated herein may result in the immediate cancellation by Technical of all outstanding orders with Supplier and refusal by Technical to continue to do business in any manner with Supplier.

I am signing this statement on behalf of Supplier as its corporate representative, to attest that Supplier acknowledges, accepts and agrees to abide by the standards, terms and conditions set forth in this Memorandum of Understanding between Supplier and Technical.

I hereby affirm that all actions, legal and corporate, to make this Memorandum of Understanding binding and enforceable against Supplier have been completed.

Supplier

Signature

Name (printed)

Title