

## Structure, Activities, and Supply Chains

**Structure:** W.R. Grace Canada Corp. (“Grace Canada”) is a wholly-owned affiliate of and directly held by W.R. Grace & Co.-Conn. and constitutes one of the many global entities held under W.R. Grace & Co.-Conn. (collectively, “Grace”). Since 1957, Grace Canada has operated in Valleyfield, Quebec and has approximately 100 employees. Grace is headquartered in Maryland, United States of America.

**Activities:** Grace Canada specializes in the manufacture of fluid cracking catalysts, additives for refineries, and intermediates used to make catalysts, such as zeolite and alumina. Grace Canada is a part of Grace’s operations, which comprises production and sale of specialty chemicals and specialty materials on a global basis through two business segments: Grace Catalysts Technologies, which includes catalysts and related products and technologies used in refining, petrochemical and other chemical manufacturing applications; and Grace Materials Technologies, which includes specialty materials, including silica-based and silica-alumina-based materials, used in consumer/pharma, chemical processes, and coatings applications. Grace Canada’s operations are a part of Grace’s global manufacturing footprint; other countries of operation include Brazil, Germany, Malaysia, the Republic of Korea, Spain, Sweden, and the United States of America.

**Supply Chains:** Grace’s supply chains include various commodity chemicals, minerals, energy, and utility inputs. In certain products, Grace may also use specialty chemical materials as inputs/ingredients.

Grace’s supply chain includes over 400 suppliers from over 30 countries. Grace Canada manufactures Molecular sieves, precipitated aluminas, olefin family promoters, Fluid Catalytic Cracking (FCC) catalysts, and environmental additives.

## Policies & Due diligence

**Policies:** Grace maintains a Code of Conduct that applies to all affiliates, including Grace Canada, and a Supplier Code of Conduct that applies to all suppliers globally. Grace’s Code of Conduct requires compliance with all applicable laws and commits Grace to conduct its activities to high levels of business ethics. Grace’s Supplier Code of Conduct specifies Grace’s expectations for our suppliers and requires (among other things) respect for human rights, and explicitly prohibits child labor and forced labor. Every supplier, regardless of spend, is expected to comply with the Supplier Code of Conduct.

### Due Diligence in Grace Operations:

For our Canadian operations, Grace complies with additional standards to help ensure no forced labor or slave labor is used:

- Grace Canada is in compliance with the Quebec Act respecting labour standards
- Grace Canada’s local Human Resources team complies with the code of conduct of Human Resources Professionals Association, an organization in Ontario which regulates Human Resource professionals in the public interest.

- Grace Canada labour activities are in compliance with Grace Corporate HR policies

For our US operations, Grace takes the following actions to help ensure no forced labor or slave labor is used:

- Pre-hire, Grace completes a background check with a third-party service vendor, ADP, verifying education qualifications with minimum high school degree or equivalent GED
- Post-hire, Grace completes Form I-9 which captures date of birth validation and prevents the unlawful hiring of individuals who are not authorized to work in the US
- Grace adheres to the Fair Labor Standards Act and ensures compliance with minimum wage requirements to compensate employees fairly.

Similar measures are employed globally. Additionally, Grace's Human Resources Information System maintains explicit controls to prevent the hiring of employees under country-specific ages. In Canada, the minimum age is 15 (to allow for student workers).

### **Grace Supply Chain Due Diligence**

Grace encourages all its suppliers to participate in a third-party sustainability evaluation conducted by the leading sustainability assessment provider, Ecovadis®. This evaluation is our primary due diligence tool to assess risks in our supply chain. While the majority (by spend) of Grace direct suppliers had completed Ecovadis surveys in 2023, we plan in 2024 to increase Ecovadis coverage and implement corrective actions for suppliers not showing evidence of their own human rights due diligence.

### **Areas of Grace that carry a potential risk of forced labour or child labour**

For Grace, the parts of business and supply chain that carry a potential risk for forced labor and child labor are associated with mined materials; in particular a limited number of conflict minerals necessary to the functionality or production of our products. Grace utilizes documentation from the Responsible Minerals Initiative to help mitigate supply chain risks by ensuring relevant materials do not come from any CAHRA's (Conflict-Afflicted or High-Risk Areas).

### **Measures taken to remediate any forced labour or child labour**

To date, Grace has not found any evidence of child or forced labor in its supply chain and as such, has not taken any remediation steps.

### **Training provided to employees on forced labour and child labour**

Grace conducted Conflict Minerals training for select procurement staff in 2023 and a broader required training curriculum is planned for 2024 and beyond for all Grace employees.

### **How Grace assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains**

Ecovadis scores and onsite audits are used for certain suppliers in Grace's supply chain. In 2024, we are planning to expand our suppliers' participation in Ecovadis' ratings system and to expand our audit database.



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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.

Full name Edwin Sparks

Title Chief Executive Officer

Date May 24th, 2024

Signature *Ed Sparks*

I have the authority to bind WR Grace Co & Conn.