

**2024 ANNUAL REPORT OF BORDER CHEMICAL COMPANY LIMITED UNDER THE TERMS OF
THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT OF CANADA,
(BILL S-211)
“THE MODERN SLAVERY ACT OF CANADA”**

OVERVIEW

Border Chemical Company Limited is a privately owned company located in the RM of Springfield in Manitoba that produces sulphuric acid and water treatment chemicals, terminals asphalt, and buys and sells fertilizer. Border Chemical does not have a website.

Raw materials are primarily supplied from companies in the businesses of oil and gas, chemicals, and fertilizers. These Suppliers are all located in North America with 95% of our raw materials coming from Canada. None of our raw materials are purchased from third world countries. We consider the risk of Modern Slavery in our supply chain to be low.

OUR POLICY

The Company policy is compliant with the Modern Slavery Act of Canada, and its provisions are intended to apply to all Suppliers of the Company in addition to the Company itself.

There can be no forced, bonded or involuntary prison labour and no human trafficking within the Company or its Suppliers. Workers are not required to lodge “deposits” or their identity papers with the Company or any of its Suppliers and are free to leave under their own volition at any time.

The use of Child labour is prohibited. Border and its Suppliers shall adhere to minimum age provisions of applicable laws and regulations.

Children and Young Persons under the age of 18 shall not be employed at night or in hazardous conditions.

Policies and procedures shall conform to the provisions of the Modern Slavery Act of Canada and the relevant provisions of the International Labour Organization (ILO) standards.

A Child is defined as any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory education in which case the higher age would apply.

A Young Person or Young Worker is defined as any worker over the age of a Child as defined above and under the age of 18.

OUR WORK FORCE

Most individuals working for Border have been made aware of this policy. Employees who have not already been made aware of this policy will have it brought to their attention in training sessions, and have the risks associated with forced and child labour both within the company and our supply chain explained to them. All employees will be asked to report to management any evidence they may see of forced or child labour in a timely manner.

Border Chemical employs approximately 80 individuals and due to the relatively small size of its work force can attest that none of them are under the age of 18 and none of them qualify as forced labour. There is minimal turn over of employees. New hires have always been over the age of 18 as confirmed by government issued photo ID at the time of hiring. Individuals between the ages of 15 and 18 are seasonally hired for summer work mowing lawns, painting, and other light daytime duties that are removed from any hazardous exposures – all in compliance with provincial legislation.

RISKS

There have been no risks of forced labour or child labour that we have been able to identify within our organization or our supply chain, and accordingly there have been no steps taken to remediate same.

Border Chemical recognizes that Modern Slavery is a violation of human rights, undermines the dignity and well-being of individuals, and is contrary to the principals of Border Chemical. Through transparent disclosure and on-going diligence, we strive to uphold the highest standards of human rights and ensure that our business practices align with our principles of conducting our business responsibly, operating with integrity, and seeking continuous improvement.

APPROVAL AND SIGNING

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act)*, and in particular section 11 thereof, I, in the capacity of President, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity 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 within this report.

Signed this 19th day of May, 2025 at Winnipeg, Manitoba.



P.B. Smerchanski, President

I have the authority to bind Border Chemical Company Limited