



Report on Forced Labor and Child Labor in Supply Chains

STRUCTURE AND ACTIVITIES OF REPORTING ENTITIES

This report is submitted by Norit Americas, Inc ("NAI" or "we"), a North American subsidiary of Norit B.V. ("NORIT" or "parent") based in Marshall, Texas, USA. NORIT employs approximately 550 individuals and has multiple global offices and production facilities in the Netherlands, United States, Canada, Italy, United Kingdom, Singapore, Latvia, and China. NORIT specializes in the production and distribution of activated carbon globally, including in Canada, for a wide range of applications. The company's diverse activated carbon product portfolio is utilized in water and air treatment, gas and vapor purification, food and beverage processing, and other industries.

GOVERNANCE AND SCOPE OF REPORT

This report is prepared in accordance with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211) and describes the measures adopted by NORIT to identify, prevent, and mitigate risks of forced and child labor in our operations and supply chains for the fiscal year ended December 31, 2024. NORIT is dedicated to maintaining human rights and responsible sourcing standards consistent with the United Nations [Guiding Principles on Business and Human Rights](#) and the OECD [Guidelines for Responsible Business Conduct](#).

This disclosure aligns with the commitments set forth in NORIT's Supplier Code of Conduct, which outlines our expectations for employees and business partners, including suppliers, agents, and designated third parties. NORIT expressly prohibits all forms of forced labor, child labor, and human trafficking, and mandates contractual controls for suppliers and other third-party partners to mitigate related risks.

SUPPLY CHAIN OVERVIEW

As a manufacturer and distributor of activated carbon products, NORIT maintains a large, globally dispersed value chain inclusive of both mined and organically produced carbon materials. NORIT activated carbon products are made using a wide variety of feedstocks from agricultural and natural resources. Primary types of feedstocks include: various types of biomasses (e.g., wood shavings, olive stones), carbonized biomasses (e.g., coconut shell charcoal, wood charcoals), peats, and coals (e.g., lignite, sub-bituminous coals, bituminous coals, semi-anthracite).

NORIT values the enduring relationships we've built with our global supplier network. We actively engage with our suppliers through regular communication and collaboration, allowing us to maintain reasonable visibility into their operations, production methods, and adherence to our expectations. This ongoing dialogue strengthens operational resilience and promotes alignment with our evolving standards. When introducing any significant new supplier into our value chain, we evaluate them to verify their alignment with NORIT's global procurement and ethical policies and standards.



SUPPLY CHAIN FORCED AND CHILD LABOR RISKS

NORIT recognizes that although we have not yet completed comprehensive risk assessments across all product components and raw materials, our procurement from the broader agriculture and mining sectors and our upstream vendor geographies may present potential exposure to forced and child labor risks. In this regard, we are mindful that NORIT procures biomass from agricultural value chains, a sector identified in the U.S. Department of Labor's 2024 International Child Labor & Forced Labor Reports as higher-risk for goods produced by vulnerable labor populations. NORIT also recognizes that some regions it sources from, namely China, have been identified as higher-risk geographies for labor exploitation. We are also mindful of the risks associated with the Xinjiang Autonomous Region, as addressed by the U.S. Uyghur Forced Labor Prevention Act (UFLPA).

To address these risks, we are committed to enhancing our due diligence and oversight in line with our responsible sourcing principles. NORIT is steadfast in upholding internationally recognized human rights standards, including the absolute prohibition of child and forced labor. We do not knowingly engage any suppliers implicated in such practices. To date, we have not knowingly conducted business with any supplier where a verified incident of child or forced labor has been reported. Recognizing the elevated risk in certain regions and industries, we commit to ongoing vigilance and continuous monitoring of guidance issued by the U.S. Department of Labor and other authoritative bodies.

SUPPLY CHAIN LABOR PRACTICES POLICY AND TRAINING

NORIT has implemented a Code of Ethics and Business Conduct that establishes explicit standards prohibiting forced labor and child labor across all subsidiaries, business partners, and vendors. This Policy is incorporated into our employee handbook, and all employees are required to formally acknowledge their understanding and commitment.

The Policy reflects internationally recognized human rights and labor frameworks, including those of the International Labour Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights. It mandates compliance with all applicable laws regarding human trafficking, child labor, and forced labor, and extends to fair wages and benefits, reasonable working hours, freedom of association, non-discrimination, and a safe and healthy work environment.

NORIT also maintains a standalone Supplier Code of Conduct, which requires all business partners, including suppliers, to comply with all local and national labor laws regarding compensation and working hours and prohibits all unlawful employment discrimination, child labor, or forced labor practices. NORIT imposes restrictions on its vendors to comply with internationally recognized labor standards in its Supplier Code of Conduct as a term of engagement.

All employees undergo annual training on the company's Code of Ethics and Business Conduct to ensure ongoing awareness. Annual training materials are updated to reflect any changes to NORIT policies and guidance. Employees in procurement, quality assurance, and other supplier-facing roles may also receive additional instruction on supplier monitoring and audit procedures.

SUPPLY CHAIN RISK MITIGATION AND REMEDIATION PRACTICES



NORIT monitors relevant regulatory developments in each jurisdiction where we operate. We also review the U.S. Department of Labor's International Child Labor & Forced Labor Reports to identify exposure to higher-risk regions.

Norit's Supplier Code of Conduct is included in the terms and conditions of purchase orders and procurement contracts, with limited exceptions, including where supplier insists on its own code of conduct and such code of conduct is at least as restrictive as Norit's supplier code of conduct. Norit's standard purchase order and supplier terms and conditions include an affirmation by the supplier that no form of forced labor is employed in fulfilling any purchase order.

Norit also requires that all suppliers complete a questionnaire, which includes certification of compliance with its Supplier Code of Conduct terms, including its prohibitions on forced and child labor. Supplier questionnaires also evaluate vendor labor management programs and training for employees to mitigate risks of forced and child labor across their operations.

SUPPLY CHAIN PROGRAMMATIC EVALUATION

While we may enhance our audit frameworks and risk management practices to better address labor risks within the supply chain, particularly those that are prevalent in higher risk geographies or the agricultural or mining sectors, we do not currently have formal remediation procedures in place for identified cases of forced or child labor. This also includes the absence of protocols to address potential income loss resulting from risk mitigation actions. We recognize that such measures may have economic implications for vulnerable populations. However, to date, we have not identified any incidents that have required remediation.

ATTESTATION OF APPROVAL

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.

Signed,

A handwritten signature in cursive script that reads "Pete Zografakis".

Pete Zografakis
VP, General Counsel and Chief Compliance Officer
May 30, 2025

I have the authority to bind the reporting entities represented in this report: Norit Americas, Inc; Norit B.V.