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Bill S-211 Annual Report for Reynolds Consumer Products Canada Inc.

Reporting Year: January 1, 2024 through December 31, 2024

a. Structure, Activities, and Supply Chains

Reynolds Consumer Products Canada Inc. (“RCP Canada”), is a Canadian wholly-owned subsidiary of Reynolds Consumer Products Inc., specializing in manufacturing and selling aluminum foil and parchment products, primarily under the Reynolds and Alcan brands. RCP Canada also engages in resale of imported products in the tableware and wastebags categories under the Hefty brand.

RCP Canada operates out of Mississauga, Ontario, and its Toronto plant boasts significant production capabilities, including millions of pounds of aluminum foil products annually. RCP Canada's competitive advantages lie in local manufacturing and offering a diverse product range to customers in single orders.

In its supply chain, RCP Canada sources materials both locally and internationally. The company engages in both manufacturing and resale, with quality control for its products managed in-house at the Toronto facility. Sales and marketing efforts are focused within Canada, targeting major retailers.

RCP Canada's distribution system is optimized through automated inventory and sales forecasting systems, facilitating efficient order placement and management. The company also handles administrative functions, including finance and HR, tailored to Canadian regulations, with IT services centralized under Reynolds Consumer Products LLC, which is also a subsidiary of Reynolds Consumer Products Inc. This structured approach to manufacturing, sales, distribution, and administration supports RCP Canada's position in a competitive market, emphasizing efficiency, local production advantages, and customer service.

Different groups throughout RCP Canada are responsible for implementing the diligence and procedures described below. Reynolds Global Quality is responsible for quality monitoring, compliance enforcement, and ethical and social standards and employee safety with outside manufacturers against RCP Canada requirements. Reynolds Global Quality team collaborates with a cross-functional team including Global Commercialization, Procurement, and Legal and Regulatory. Within that team, Global Commercialization is responsible for identifying sourcing and developing contracts with manufacturers of finished goods. Procurement is responsible for identifying sourcing and developing contracts with manufacturers of semi-finished goods.

b. Policies and Due Diligence

Policies and Contracts: RCP Canada implements robust due diligence policies and procedures related to forced labour and child labour. Some of the policies and due diligence procedures implemented by RCP Canada involve including certain contractual provisions with vendors and suppliers, which state expectations of suppliers to comply with Reynolds ethics policies. Those provisions also include expectations that suppliers utilize only freely chosen employment, absent of discrimination, and free of bonded and child labour. Reynolds also maintains the following due diligence procedures when necessary: Embedding responsible business conduct into policies and management systems; Identifying and assessing adverse impacts in operations, supply chains and business relationships; Ceasing, preventing, or mitigating adverse impacts; Tracking implementation and results; Communicating how impacts are addressed; and providing for or cooperating in remediation when appropriate.

On-site visits: Reynolds Global Quality also performs due diligence through on-site audits of suppliers to verify and validate compliant practices with respect to forced labour and child labour.

c. Forced Labour and Child Labour Risks

RCP Canada and Reynolds Global Quality regularly conducts risk assessments and reviews its supply chain to assess its activities to identify risk areas for forced labour or child labour both in its own activities and the activities of its direct and indirect suppliers. Some of the identified risk factors include: Locations of activities, operations, and factories; Tier one (direct) suppliers; The use of outsourced, contracted, or subcontracted labour; and the use of migrant labour.

d. Remediation Measures

As described above, RCP Canada and Global Quality regularly conducts risk assessments and reviews its supply chain to assess its activities to identify risk areas for forced labour or child labour both in its own activities and the activities of its direct and indirect suppliers. Neither forced labour nor child labour were identified during these risk assessments and reviews.

e. Remediation of loss of income

As described above, neither forced labour nor child labour were identified in RCP Canada's activities and supply chains. Therefore, there was no resulting loss of income or need for remediation of loss of income.

f. Training

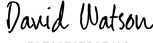
RCP Canada has several mandatory employee trainings which either directly or indirectly relate to forced labour and child labour and relevant risk factors. Training is mandatory for employees making contracting or purchasing decisions and managing contracted manufacturers. The required training includes all elements of the ETI Base Code and specific US laws and regulations related to supplier ethical and social compliance.

g. Assessing Effectiveness:

RCP Canada and Reynolds Global Quality monitor and assess the effectiveness of the Supplier Ethical and Social Compliance program in three ways: 1) Self-Assessments: An annual self-assessment is required from all outside manufacturers to communicate to RCP Canada the status and implementation of management systems which ensure proper mitigation against forced and child labour.; 2) 3rd Party Ethical and Social Compliance Audits: Depending on performance, these audits are required at least every 2 years of RCP Canada's outside manufacturers; and 3) On-site verification: Reynolds Global Quality conducts its own audits and follow-up assessments to verify the implemented management practices of outside manufacturers are effective and to give correction where needed.

### **Approval and attestation**

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 general counsel, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity listed above. I have the legal authority to bind the entity. 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. I have the authority to bind RCP Canada.

Signed by:  
  
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**David Watson**  
**General Counsel**  
**Date:** 4/9/2025

