



SUPPLY CHAIN
FORCED LABOUR AND CHILD LABOUR

THAMES RIVER CHEMICAL CORP.
2024 ANNUAL REPORT

REPORT INTRODUCTION

This report is provided in accordance with the requirements of the Canadian “*Fighting Against Forced Labour and Child Labour Act*” for the year ending December 2024.

This report has been approved by the owners of the company.

COMPANY INTRODUCTION

Thames River Chemical Corporation (“the company”) is a privately owned family business that was founded in 2006 and operates out of Burlington, Ontario, Canada. The company has sales representation and product managers located in British Columbia, Alberta, Ontario, Quebec, the Maritimes and the United States. The company proudly offers unique services of product sourcing, distribution, technical expertise, and supply services throughout Canada and also into the United States. Our product portfolio covers the import, sales and distribution to multiple chemical sectors such as: Fertilizer, Animal Feeds, Personal Care, Household, Industrial, Institutional, Pharma, Mining, Oil and Gas, Composites, Polymer, Lubricant, CASE and Water Treatment.

Thames River Chemical Corp. activities are comprised of product sourcing on a global scale, direct importation, distribution, custom blending and brokering supplier direct to customer sales in Canada and the United States.

Business Number: 844753327

OUR SUPPLY CHAIN

The company has a global supply chain including, but not limited to suppliers from the following geographical countries:

- Asia (Indonesia, China, Malaysia, India, South Korea, Pakistan)
- Europe (France, Belgium, Germany, Turkey, Switzerland)
- North America
- South America

At years end 31 December 2024 the company had a total of 235 global suppliers from the above countries, providing a broad range of approximately 340 chemicals.

Thames River Chemical Corp. stakeholders include:

- Suppliers
- Customers
- Federal Regulatory authorities
- Municipal Regulatory authorities
- Chemical Community (members of Responsible Distribution Canada-RDC, Alliance for Chemical Distribution-ACD & Roundtable on Sustainable Palm Oil-RSPO)
- Business Sustainability-Ecovadis
- RDC (Responsible Distribution Canada)

OUR COMMITMENT

The company is committed to responsible product sourcing, and the safety and well-being of workers across our global supply chain. We recognize and respect human rights and have taken a zero-tolerance stance against any form of forced labour, child labour and human trafficking.

STEPS TAKEN TO REDUCE RISK

The company has put in place a policy and process to prevent and reduce the likelihood of forced labour and child labour being practised within our supply chain in support of our commitment to upholding human rights and our zero tolerance towards human rights abuses and practices. The policy documents our commitment to screen, evaluate and continually monitor suppliers and to identify potential human rights risks, abuses, and practices in our supply chain.

In its commitment against forced labour and child labour the company has developed a Supplier Code of Conduct which encompasses Environmental, Social and Governance (ESG) and endeavors to continue to obtain the commitment from our suppliers.

In addition, the company has implemented awareness training and provided information to our sales managers and essential supply chain procurement specialists regarding the risks of forced labour and child labour practices in high-risk countries. The company has also identified that the awareness training shall be conducted on an annual basis to reaffirm and remind designated personnel as to the importance, and the legal requirements, for continuous vigilance.

OUR POLICIES

HUMAN RIGHTS INTERNAL:

The company upholds its Human Rights Policy with regards to accessibility, child/forced Labour, Health & safety, non-discrimination, equal opportunity, fair wages, workplace violence & harassment and anti-corruption.

HUMAN RIGHTS – SUPPLY CHAIN:

The company has developed and implemented a Policy, “Human Rights”, which firmly establishes our commitment to respect human rights, fight against forced labour and child labour. The policy documents our commitment to upholding human rights and that we do not tolerate human rights abuses and practices of any kind; including forced labour and child labour in our operations supply chains or by third party entities that we do business with.

SUPPLIER CODE OF CONDUCT:

Our suppliers are required to formally acknowledge, commit to and adhere to our Supplier Code of Conduct which covers Environmental, Social and Governance (ESG) aspects which includes those of forced labour and child labour practices or provide their Human Rights Policy or Code of Conduct with regards to Forced labour and Child labor policy. The supplier shall operate in a socially responsible and non-discriminatory manner.

DUE DILLIGENCE

As part of our due diligence the company shall endeavor to:

- Adopt a zero-tolerance policy with regards to any form of forced labour and child labour.
- Vet new and existing suppliers with our Supplier Code of Conduct.
- Screen and evaluate potential new suppliers of chemicals for new business opportunities in Canada or the United States.
- Review and monitor new projects to ensure compliance with all regulatory aspects.
- Require suppliers to officially acknowledge and adhere to our Supplier Code of Conduct.
- Conduct risk assessments based on the country in which the supplier operates from, using available resources such as Human Rights and Rule of Law, Civil Liberties Indexes, ILAB - US Department of Labor Lists of Products & Goods Produced by Child Labor or Forced/Indentured Labor, US Department of Homeland UFLPA Entity list, Corruption Perception Index, Responsible Sourcing Tool (RST), JWW Uyghur Forced Labor Database as well as negative media reports or legal action proceedings.
- Suppliers operating in high-risk countries shall be classified as high priority for investigation into human rights violations.
- High risk suppliers shall be assessed for risk annually, medium risk suppliers every 2 years and low risk suppliers every 3 years.
- Maintain a database of suppliers that have been screened and ranked based on risk to define the frequency of review intervals.
- Supplier performance shall be reviewed annually in our Management Review meeting held in December.

During the reporting year we have assessed 46 of our suppliers and found no instance of high risk that require immediate action or future action.

We have, however, identified one supplier that operates in the Xinjiang Province in China. They are audited against SMETA (Sedex Members Ethical Trade Audit Report) conducted by DNV Business Assurance and found to operating in full compliance to labour, health & safety, environmental and business ethics standards.

Our due diligence assessments have not identified any of our products on the ILAB list of products nor on the Responsible Sourcing Tool nor has it identified any company's that we source products from on the UFLPA Entity List or the JWW Uyghar Forced Labor Database.

REMEDATION MEASURES TAKEN

The company has not identified any instances of forced labour or child labour in our activities or supply chain during the 2024 reporting year and therefore we have not had the need to initiate remediation measures.

REMEDIATION MEASURES TAKEN FOR LOSS OF INCOME

The company has not identified any instances of forced labour or child labour in our activities or supply chain and, therefore, have not had the need to initiate remediation measures. As a result, we have not needed to take any measures during the 2024 reporting year to eliminate the use of forced labour or child labour or to remediate the loss of income to the most vulnerable families.

ASSESSING EFFECTIVENESS

The owners of the company have oversight of the Regulatory Departments work regarding child labour and forced labour, and compliance with relevant legislation, and will receive an update for the annual Management Review meeting regarding risk assessments and progress against the company's Human Rights Policy and the status of high-risk suppliers, if any.

AWARENESS TRAINING

To ensure a high level of understanding of the risks of Forced Labour and Child Labour the company shall provide training in human rights, forced labour, child labour and unacceptable labour practices to all essential material sourcing personnel who actively source products and services from our current suppliers and/or have direct dealings with potential suppliers.

All designated team members are required to annually complete an e-learning training module as part of an annual refresher. All new team members shall undergo training as part of our hiring and onboarding process. During the 2024 reporting year all personnel involved in supplier and /or supply chain decisions received the appropriate human rights training.

STEPS GOING FORWARD

As part of our due diligence Thames River Chemical Corp. endeavors to continually vet new and existing supplier in our supply chain by way of our Supplier Code of Conduct (SCC). This SCC requires a signed commitment by our suppliers and proof of their commitment to protecting all aspects of the human rights of their work force and supply chain. Supplier human rights and forced labour policies will continue to be accepted as proof of their commitment.

Incorporate the Global Slavery Index in our screening and evaluation process to determine global slavery risk factors.

Continue to evaluate our screening process to determine whether we can improve on our due diligence process.

Maintain, and where possible improve on, a meaningful tracking system which aids in defining high, medium and low risk suppliers.

Where possible, Thames River Chemical Corp. shall conduct on-site audits on suppliers and their operations to determine whether there are any human rights violations in existence.

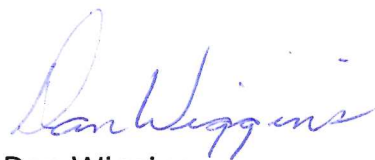
In our EcoVadis assessment of 2024 we achieved a Silver Medal status score of 66. Our goal going forward is to improve on this to achieve a Gold Medal status with a score of 72 or greater in 2025.

The company shall continue to screen and evaluate new and current suppliers that have not yet been evaluated against our due diligence process, with high-risk suppliers taking precedence over those of medium and then low risk.

In the reporting year of 2025 the company aims to achieve RSPO (Roundtable For Sustainable Palm Oil) Supply Chain Certification to improve our sustainability profile and to promote the use of sustainable products and ethical products in the industries we support.

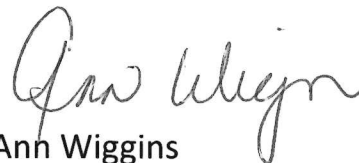
In accordance with the requirements of the Act, and in particular, section 11 thereof, I attest that I have reviewed the information contained in this report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year of 2024.

Signed:



Dan Wiggins

Chief Executive Officer



Ann Wiggins

President

We have the authority to bind Thames River Chemical Corporation

This day of 16 May 2025.