

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 are comprised of 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 process, 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 the highest 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 law.
- Grace Canada’s local Human Resources team complies with the code of conduct of Human Resources Professional Association, an organization in Québec which regulates Human Resource professionals.
- Grace Canada Management shares senior leadership vision as stated on Grace.com
- 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



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- 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

In 2024, Grace created and implemented a new Human Rights Due Diligence process. Grace partnered with a third-party AI tool to scan its supply base for potentially risky suppliers, which took the number of relevant suppliers from over 5,000 to around 300. The tool bases its human rights risk assessment on suppliers' locations, trading partners, industry, news articles, and other relevant information. Grace created and led training for suppliers and procurement professionals on the new processes and asked all potentially high-risk suppliers to complete an Ecovadis assessment. By spend, over 86% of potentially high-risk suppliers had completed the Ecovadis assessment by the end of 2024. Those who did not complete the assessment will be subject to additional due diligence tools in 2025.

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 conflict minerals necessary to the functionality or production of, a limited number 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 (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 created and conducted training for all relevant procurement staff and potentially high-risk suppliers in 2024

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

Grace uses the Human Rights Due Diligence process described above to monitor its supply chain. Grace will continue to refine the process to ensure effectiveness.



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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 28, 2025
Signature 

Signed by:
Edwin Sparks

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