

ANNUAL REPORT

PURPOSE

This Annual Report has been prepared by Atlantic Coated Papers (“ACP”) for the 2026 financial reporting year to fulfill its obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c. 9 (the “Act”).

OUR COMMITMENT

ACP remains steadfast in its commitment to preventing and mitigating the risk of forced labour or child labour within any stage of its goods production activities in Canada.

STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

ACP specializes in providing cost-effective, custom extrusion coating and lamination solutions to clients across North America. Our strength lies in the expertise, dedication, and focus of our team.

To ensure high quality and dependable value, ACP sources materials from suppliers within both local and extended networks across Canada and the United States. Our longstanding relationships within the pulp and paper industry have underscored the benefits of supporting local economies and communities.

STEPS TAKEN BY ACP IN FISCAL YEAR 2026

Throughout the 2026 fiscal year, ACP maintained existing policies and due diligence procedures aimed at addressing the risk of forced and child labour in its operations and supply chain. While not directly targeting specific regions or suppliers, these measures contributed to reducing the overall risk within ACP’s internal practices and supplier relationships.

POLICIES AND DUE DILIGENCE PROCESSES

During the reporting year, ACP upheld several key policies and processes that support compliance with applicable laws on forced and child labour, including:

a) **Code of Ethics** – ACP’s Code emphasizes the importance of integrity, requiring all employees to avoid conflicts of interest and uphold ethical conduct in accordance with legal standards. The



ATLANTIC COATED PAPERS - 1605 McEwen Dr. Whitby, ON, L1N 7L4 📞 416-299-1675 📠 416-299-9106

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Code is mandatory for all staff.

b) **Core Labour Policy** – This policy articulates ACP’s clear stance against all forms of forced and compulsory labour, as well as child labour, and is communicated to employees, suppliers, and partners.

c) **Standard Terms and Conditions** – Incorporated into our standard bid documents, these terms reserve ACP’s right to disqualify proponents found guilty of crimes or professional misconduct that undermines commercial integrity.

d) **Supplier and Contractor Agreements** – ACP’s contracts mandate compliance with all applicable laws, including labour and employment standards, and national or international prohibitions on child and forced labour.

FORCED LABOUR AND CHILD LABOUR RISKS

ACP has not yet undertaken a formal assessment to identify specific risks related to forced or child labour within its operations or supply chain. However, we acknowledge that certain regions, industries, or products may pose a higher risk.

REMEDIATION MEASURES

No instances of forced or child labour were identified within ACP’s operations or supply chains during the reporting year. Therefore, no remediation actions were required.

REMEDIATION FOR LOSS OF INCOME

ACP has not identified any loss of income affecting vulnerable families as a result of actions taken to eliminate forced or child labour, and accordingly, has not implemented any related remediation measures.

TRAINING PROVIDED TO EMPLOYEES

In 2026, ACP did not deliver training programs specifically focused on forced or child labour. Future consideration will be given to the implementation of appropriate training initiatives.

ASSESSING EFFECTIVENESS

At present, ACP does not have dedicated mechanisms for evaluating the effectiveness of its efforts to prevent forced and child labour. Nonetheless, current policies and practices contribute to reducing associated risks in our operations and supply chains.






PACKAGING
PROTECTION
PERFECTION

APPROVAL AND ATTESTATION

Pursuant to Section 11 of the Act, I hereby attest that I have reviewed the contents of this report for the entity listed above. Based on my knowledge and after exercising reasonable diligence, I confirm that the information is true, accurate, and complete in all material respects for the purposes of the Act and for the reporting year stated above. **IN WITNESS WHEREOF** the authorized signing officer(s) of Atlantic Coated Papers have executed this report as of the effective date of the signatures set out below.

IN WITNESS WHEREOF, the authorized signing officer(s) of Atlantic Coated Papers have executed this report as of the effective date indicated below.

SIGNED: 

Date: April 16, 2026

Name: Kate Akulov, CPA, CMA

Title: Controller



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