

## **REPORT CONCERNING THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT (CANADA) FOR THE 2024 FINANCIAL YEAR**

### **Introduction**

This report ("**Report**") is submitted on behalf of Nexeo Plastics Canada Corp. ("**Nexeo Plastics Canada**"). Nexeo Plastics Canada, which is part of the Nexeo Plastics group of companies (collectively, "**Nexeo Plastics**"), is committed to conducting its business ethically, with integrity, and in compliance with all applicable laws and regulations. Nexeo Plastics is dedicated to respecting international human rights and to ensuring that it is not complicit in human rights abuses, including, without limitation, forced labour and child labour, exploitation, trafficking, and other human or labour rights violations.

This Report is made in accordance with Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "**Act**") and sets out the steps that Nexeo Plastics Canada has taken during its 2024 financial year (1 October 2023 to 30 September 2024) to identify, assess, and mitigate the risk that forced labour and/or child labour is used in its operations and supply chains.

In this Report, Nexeo Plastics Canada has made a good faith attempt to provide complete and accurate responses, in all material respects, which describe the concrete actions that have been taken to address the risks related to forced labour and/or child labour in its operations and supply chains. This Report focuses on actions taken during the previous financial reporting year, but some actions may span multiple years.

### **Nexeo Plastics' Structure, Activities, and Supply Chains**

Nexeo Plastics is a leading global thermoplastic resins distributor, representing quality products from world-class suppliers, and serving a diverse global customer base. From material selection assistance to identifying supply chain and inventory solutions, Nexeo Plastics goes beyond traditional logistics to provide value-added services across many industries, including mobility, healthcare, packaging, electrical and electronics, wire and cable, industrial, and more. Nexeo Plastics leverages its people, global reach, and technology platforms to create unique ways to help customers reduce complexity in their businesses, identify efficiencies, and unlock value for both suppliers and customers.

Nexeo Plastics Canada is a British Columbia corporation, BC1184247, and a wholly owned subsidiary of Nexeo Plastics, LLC, a limited liability company organized and existing under the laws of the State of Delaware, USA. Nexeo Plastics is owned by GPD Companies, Inc., a holding company formed by One Rock Capital Partners, LLC and its affiliates with the intent to create a leading group of global, value-added distributors of plastics raw materials.

As part of the Nexeo Plastics group of companies, Nexeo Plastics Canada is integrated and follows the policies and procedures of the Nexeo Plastics organization. More information about Nexeo Plastics can be found at [www.nexeoplastics.com](http://www.nexeoplastics.com).

At the end of the 2024 financial year, Nexo Plastics Canada had over 30 employees and operated in approximately 15 warehouse and distribution facilities across Canada. Nexo Plastics Canada's primary activity consists of the sale and distribution of thermoplastic resins to its customers. Thermoplastic resins are typically purchased by Nexo Plastics Canada directly from well-known manufacturers in the polymer industry. Nexo Plastics Canada also purchases resins from other companies within the Nexo Plastics group. These transactions generally require Nexo Plastics Canada to import product into Canada for resale and distribution. While most of Nexo Plastics Canada's customers are located in Canada, Nexo Plastics Canada also sells products to customers in other countries, including, without limitation, the United States, Israel, China, and Hungary.

Nexo Plastics Canada works primarily with third party logistics providers to facilitate the warehousing and transportation of its products. As such, Nexo Plastics Canada's supply chains extend beyond Canada into other areas throughout the globe.

### **Nexo Plastics' Policies and Due Diligence Processes**

Nexo Plastics is strongly committed to conducting business ethically and legally. Nexo Plastics is firmly against any form of forced labour or child labour and will not condone or tolerate any type of such conduct by its employees, suppliers, vendors, or other business partners.

Nexo Plastics' commitment to compliance is incorporated into its Global Standards of Business Conduct ("GSBC"), its Environmental, Social, and Governance ("ESG") initiatives, and its corporate governance framework. The GSBC is the cornerstone of the company's compliance commitments and sets the standards for Nexo Plastics' actions. In addition to the GSBC, Nexo Plastics' policies include a Human Rights Position, Human Trafficking Policy, and Supplier Code of Conduct, all of which can be viewed on the corporate compliance page of Nexo Plastics' website at <https://www.nexoplastics.com/about-us/corporate-compliance>. Nexo Plastics also strives to take a range of actions related to human rights due diligence, ESG initiatives, and responsible business conduct. While these efforts are not always specifically or exclusively focused on forced labour or child labour, Nexo Plastics promotes compliance with applicable laws and regulations and its policies, which prohibit human rights abuses. For example, Nexo Plastics participates in an annual ESG review and assessment, which covers various governance and compliance matters, including modern slavery. Nexo Plastics also continues to actively pursue various sustainability and ESG efforts and was awarded a Silver sustainability rating from EcoVadis® in May 2024.

Nexo Plastics' due diligence processes include:

- Identifying and assessing and prioritizing potential adverse impacts to operations and supply chains via risk assessments.
- Implementing actions to cease, prevent, or mitigate identified risks, such as regular compliance screening and contractual provisions.
- Tracking and documenting the implementation and results.
- Communicating how risks are addressed through internal and external communications, as appropriate.

Nexeo Plastics' due diligence processes regarding forced labour and child labour are intertwined with the company's GSBC, ESG initiatives, and other compliance policies to help ensure that all business is conducted in a manner that is consistent with Nexeo Plastics' core values of integrity, accountability, and transparency. By embedding principles related to the abolition of forced labour and child labour in our policies and management systems, Nexeo Plastics' compliance platform is integrated with its business operations, which enhances Nexeo Plastics' ability to effectively identify, assess, and mitigate risks related to unethical labour practices and potential adverse impacts across its supply chains.

### **Forced Labour and Child Labour Risks in Nexeo Plastics Canada's Supply Chains**

Nexeo Plastics recognizes that modern slavery can be found in almost every country around the world and that certain vulnerable groups of people, including, children, women, and migrant workers are most at risk of being exploited through modern slavery. Modern slavery includes forced labour, such as bonded labour and domestic servitude, child labour, human trafficking, and other types of exploitation of vulnerable individuals. Nexeo Plastics Canada recognizes that there is an inherent risk that broad supply chains are linked to human rights violations, including modern slavery, such as forced labour and child labour, and keeps these risks front of mind when engaging with third parties in its supply chain.

Nexeo Plastics Canada purchases the majority of its thermoplastic resins from reputable U.S. and Canadian manufacturers in the plastics industry. Many of these key supplier partners have compliance programs and policies that are substantially aligned with the principles of Nexeo Plastics' operations. As such, Nexeo Plastics Canada believes the risk of the use of forced labour and child labour within its first tier supply base is quite low. There may be a potential risk of forced labour and child labour within the warehousing and transportation functions of Nexeo Plastics Canada's business, as Nexeo Plastics Canada primarily utilizes support from third party service providers to manage its operations. However, based on an initial assessment, Nexeo Plastics Canada believes the risk is relatively low as it relates to its direct subcontractors. The risk of forced labour or child labour is believed to be higher farther downstream in Nexeo Plastics Canada's supply chains, such as with subcontractors involved with manufacturers or their suppliers or sub-suppliers. A more in-depth risk analysis needs to be undertaken to better ascertain the level of risk of forced labour or child labour associated with these lower tier sub-suppliers and subcontractors in the supply chain, and Nexeo Plastics Canada will need to rely on its direct and first tier suppliers and vendors to help with this evaluation.

In an effort to better assess and manage the risks of forced labour and child labour in its supply chains, Nexeo Plastics Canada has implemented specific measures, which include, but are not limited to:

- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains.
- Gathering and maintaining information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily.
- Developing and implementing anti-forced labour and/or anti-child labour standards, codes of conduct and/or compliance checklists.
- Auditing suppliers.
- Developing and implementing grievance mechanisms to address complaints in the workplace.

- Developing and implementing training and awareness through Nexeo Plastics' compliance program.

In furtherance of these efforts, Nexeo Plastics reviewed and refreshed its GSBC during the financial year ending 30 September 2024, as well as the accompanying training, to put more focus on this topic and to include expanded statements regarding no-tolerance toward modern slavery. The updated training was launched to the organization in 2025. Nexeo Plastics has adopted a robust framework for combating modern slavery and human trafficking based on applicable legal requirements, including:

- Providing a comprehensive definition of human trafficking that includes all forms of exploitation;
- Requiring countries to develop anti-trafficking laws in accordance with applicable laws and regulations;
- Mandating protection and assistance for trafficking victims; and
- Emphasizing the need for international cooperation to combat human trafficking.

Nexeo Plastics takes a proactive stance to support and to respect international human rights and to ensure that we are not complicit in human rights abuses, including, without limitation, forced labor and child labor, exploitation, trafficking, and other human or labor rights violations. In this vein, Nexeo Plastics seeks to do business with suppliers, vendors, and subcontractors who share the same goals to ensure compliance with applicable laws and regulations with respect to modern slavery and human trafficking, including forced labour and child labour.

While Nexeo Plastics Canada does not mandate that each supplier, vendor, or subcontractor adopt Nexeo Plastics' compliance policies and procedures related to forced labour or child labour in its respective activities, Nexeo Plastics Canada does encourage them to accept our Supplier Code of Conduct, or, in the alternative, develop their own policies that align with and are substantially similar to the principles of Nexeo Plastics' compliance program and company values. For the avoidance of doubt, Nexeo Plastics Canada requires that all third party suppliers, vendors, and subcontractors comply with applicable laws and regulations in providing goods and services to the company.

In addition, Nexeo Plastics Canada maintains internal recruiting and hiring procedures to ensure that workers are hired voluntarily and are not coerced or forced into working for the company. Nexeo Plastics Canada also has internal policies and procedures to verify that each new hire meets any minimum age requirements under applicable laws.

The above details are not exhaustive; however, Nexeo Plastics Canada strives to improve upon existing protocols on a continuous basis to strengthen its compliance programs, which clearly communicate that the company does not support or tolerate forced labour or child labour in its business or its supply chains.

#### **Measures Taken to Remediate Forced Labour and Child Labour, Including Remediation Measures for Loss of Income**

Nexeo Plastics Canada has not identified any forced labour or child labour in its activities and supply chains during the 2024 financial year; as such, remediation measures are not applicable.

Nexo Plastics Canada has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains during the 2024 financial year; therefore, no remediation measures were taken in this regard.

In the event an actual or alleged violation occurs or if there is a suspected issue within its supply chains, Nexo Plastics will immediately investigate the matter further. Thereafter, Nexo Plastics will take appropriate remediation measures, which will depend on the specifics of the individual situation. Any such measures will be taken as promptly as practicable.

### **Employee Training**

Nexo Plastics' training program includes a regular cadence of e-learning modules and/or in-person training sessions, some of which are targeted to specific groups within the organization, to ensure awareness, understanding, and adherence to Nexo Plastics' policies and procedures. GSBC training is targeted to be completed once per year, and all new employees are required to take GSBC and other compliance training courses during their on-boarding process. During the 2024 financial year, Nexo Plastics provided training on forced labour and child labour for certain employees, which covered specific risks associated with Nexo Plastics' industry and regions of operation. In 2025, refreshed GSBC training was launched to all global Nexo Plastics employees. Going forward, Nexo Plastics will continue to ensure comprehensive training and communication is provided to a broad employee audience in an effort to promote awareness of key compliance principles, including Nexo Plastics' no-tolerance stance on modern slavery, including, without limitation, forced labor and child labor, exploitation, trafficking, and other human or labor rights violations.

Nexo Plastics' training content is provided by a reputable compliance vendor (or, in limited situations, developed internally to address specific needs), reviewed and overseen by the Nexo Plastics Legal Department, and regularly updated to accommodate changes to applicable laws and regulations. Nexo Plastics' training platform also includes links to comprehensive internal resources, such as our Legal and HR Intranet sites, which are available 24/7 to all employees. Management is also trained on how to promptly handle and escalate appropriately any compliance issues or concerns that may arise from their teams.

In conjunction with its training programs, Nexo Plastics has established a multi-lingual, 24/7 global hotline by which any employee or third party can report any compliance issues or concerns, including any concerns about potential forced labour or child labour in Nexo Plastics' supply chains, on a confidential basis. All employees are trained on how to access and use the hotline.

### **Assessing Effectiveness**

Nexo Plastics recognizes that preventing and addressing risks and potential human rights violations, including forced labour and child labour, is an on-going process.

Nexo Plastics is committed to ensuring that forced labour and child labour are not being used in its activities and supply chains using:

- Nexeo Plastics' 24/7 global hotline, which is available all employees and third parties, to track cases reported within the company. The hotline is currently located at the following URL: <https://secure.ethicspoint.com/domain/media/en/gui/60649/index.html>
- A regular assessment or review of Nexeo Plastics' policies on key compliance topics, including, but not limited to, forced labour and child labour.
- A rigorous third-party compliance screening process, which involves continual daily screenings of vendors, customers, and suppliers, to identify potential concerns promptly.
- Continuous engagement with key stakeholders, including regular contact with suppliers and vendors involved in Nexeo Plastics' supply chain operations and activities.

These mechanisms help ensure that Nexeo Plastics' operations adhere to the highest standards of regulatory and legal compliance.

### **Conclusion**

Both Nexeo Plastics Canada and Nexeo Plastics globally are committed to conducting its business ethically, with integrity, and in compliance with all applicable laws and regulations. Nexeo Plastics believes in the value of all individuals and their rights as represented in the United Nations' Universal Declaration of Human Rights, the principles defined in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and other principles and guidelines that promote respect for people connected to the Nexeo Plastics business. Nexeo Plastics believes that its business should be conducted in such a manner to ensure the safety and protection of human rights, to embrace a diverse and inclusive workforce, and to avoid any complicity in forced labour, child labour, exploitation, trafficking, physical punishment, unfair work hours or compensation, limits to freedom of association or other modern slavery or human or labour rights violations. Nexeo Plastics is committed to increasing awareness and understanding of the risks of forced labour and child labour in its supply chains and business activities and will continuously work to further develop and strengthen our efforts to respect and promote all proclaimed human rights, including the right not to be subjected to forced labour, slavery, or human trafficking.

This Report was approved by the Board of Directors of Nexeo Plastics Canada Corp. on May 30, 2025.

### **Approval and Attestation**

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 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.

A handwritten signature in blue ink that reads 'Carrie Rutherford'.

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Carrie Rutherford  
Director, Nexeo Plastics Canada Corp.  
May 30, 2025

**I have authority to bind Nexeo Plastics Canada Corp.**