



United Initiators Canada Ltd. Fighting Against Forced Labour and Child Labour in Supply Chains (or “Supply Chains Act”) Report

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1. Introduction

This Report (“the Report”) is the first Forced Labour and Child labour Report submitted by United Initiators Canada Ltd. (“we”, “our”) pursuant to *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“Act”). It covers United Initiators Canada Ltd.’s most recently completed financial year ending December 31, 2023 (“Reporting Period”). United Initiators Canada Ltd. is a wholly owned subsidiary of United Initiators GmbH (“United Initiators”, “its”, “theirs”, “the Company”). The Report outlines the steps United Initiators Canada Ltd. has taken during the Reporting Period to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.

2. Steps Taken in the Previous Financial Year to Prevent and Reduce Risks of Forced Labour and Child Labour

United Initiators believes ethical business practices are fundamental to long term sustainability. In the Reporting Period, United Initiators joined the United Nations Global Compact initiative (“UN Global Compact”), a voluntary leadership platform for the development, implementation, and disclosure of responsible business practices. As a signatory of the UN Global Compact, United Initiators aligns its operations with the UN Global Compact's Ten Principles in Human Rights, Labour, Environment and Anti Corruption. This affiliation highlights the company's pledge to uphold these principles and contribute positively to the global business community's sustainability and ethical standards. As a subsidiary of United Initiators, United Initiators Canada Ltd. shares the values of our parent company and adheres to these Principles.

Key Principles include:

- The prohibition of child and forced labour.
- Protection of the right to organize and collective bargaining.
- Ensuring freedom from discrimination in employment.
- Guaranteeing fair wages and reasonable working hours.

United Initiators Canada Ltd. recognizes that this is the start of a continuous journey, and as we move forward, we plan to build upon the groundwork undertaken in the first Reporting Period to understand risks of forced labour and child labour in our activities and supply chains.

3. Our Structure, Activities and Supply Chains

3.1 Structure

United Initiators is an international company with various production and sales offices in Pullach, Germany, and various locations in France, Turkey, India, Canada, the United States of America, China, and Australia.

United Initiators Canada Ltd., based in Prince George, British Columbia, Canada, is incorporated under the *Business Corporations Act* (British Columbia). United Initiators Canada Ltd. is a wholly owned subsidiary of United Initiators GmbH (“United Initiators”).

United Initiators Canada Ltd. has been producing hydrogen peroxide for over 30 years at a single location in Prince George, British Columbia, Canada. On December 31st, 2023, United Initiators Canada Ltd. employed fifty full-time staff, five part-time staff, and one temporary employee.

3.2 Activities

United Initiators is the world's largest manufacturer fully focused on peroxide-based specialty chemicals. The company is the only global player that offers a comprehensive range of organic peroxides and persulfates (inorganic peroxides), the world leader in the production of persulfates, and is a top tier global supplier of a world-class portfolio of organic peroxides. It manufactures hydrogen peroxide in its plants in Turkey and Canada.

With over a century of expertise in research, production, and service, the company firmly establishes its commitment to the exceptional quality of its products and their vital role in fostering a sustainable future globally. The company's products serve as indispensable components across a myriad of applications and items integral to everyday life, playing a critical role in the production of a vast array of polymers and polymer-based materials. However, the utility of these products extends far beyond polymer applications. They find widespread use in consumer domains, including hair bleaching, disinfection, denture cleaning, and tooth whitening. Additionally, they are pivotal in various industrial applications, such as the production of wind rotor blades, solar cells, etching of printed circuit boards, chemical synthesis, oil and gas exploration, soil remediation, and many others.

United Initiators Canada Ltd.'s Prince George operation has been manufacturing hydrogen peroxide for over 30 years. With an extensive fleet of dedicated railcars and bulk delivery vehicles, we service the pulp and paper, mining, chemical production, and water treatment industries across Canada and in the United States. With the recent addition of custom packaging capacity, as well as high purity production processes, we have extended our products and packaging to satisfy a very broad array of customer requirements.

We pride ourselves on the safety, quality, and efficiency of our operations and the professionalism of our employees. Our focus is customer service and ensuring their needs are met, on time and in full.

United Initiators Canada Ltd. has implemented management systems which are ISO 9001 (Quality) and ISO 14001 (Environment) certified. We are also Responsible Care® certified by the Chemical Industry Association of Canada and a multi-year recipient of CN's Safe Handling Award for safe railway handling of hazardous goods.

3.3. Supply Chains

Outside of the reporting period, we initiated the process of mapping our supply chain. As part of this exercise, we identified 264 Tier 1 suppliers that United Initiators Canada Ltd. engaged with during the Report Period to procure the necessary goods and services essential for our operations. Our suppliers were located in several countries including Canada, China, Germany, India, and the United States. Of the 264 Tier 1 suppliers, 84% were in Canada, 13% in the United States, 1% in Germany, 1% in China, and 0.4% in India. 85% of our procurement spend was with suppliers located inside Canada, 5% in the United States, 4% in China, 4% in Germany, and 1% in India.

4. Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

At United Initiators, our dedication to ethical business practices, adherence to legal standards, and responsible corporate citizenship is unwavering. This includes our commitment to uphold and protect fundamental human rights as outlined in the Ten Principles of the UN Global Compact.

United Initiators Canada Ltd., as a subsidiary of United Initiators, adheres to United Initiator's Code of Conduct (the "Code"), demonstrating our commitment to acting ethically and complying with all applicable laws and regulations that govern our business.

In addition, United Initiators Canada Ltd. follows United Initiator's Supplier Code of Conduct, which sets forth the basic principles for supplier conduct globally, including those related to forced labour and child labour.

The United Initiators Compliance Hotline serves as a dedicated channel for United Initiators Canada Ltd. to report potential compliance violations. United Initiators Canada Ltd.'s Purchasing Procedures establish the general rules and guidelines within our purchasing activities.

4.1 Code of Conduct (the "Code")

The United Initiator's Code of Conduct applies to all employees, contract personnel, officers, and directors within its group of entities, including United Initiators Canada Ltd.

As a result of this adherence to the Code, United Initiators Canada Ltd. expects everyone to act ethically and abide by all applicable laws and regulations that govern our business practices. This Code applies to all our employees at all levels, wherever in the world they work. We also expect that our suppliers, agents, business partners, consultants and licensees will follow similar principles.

In addition to what is set forth in the Code, everyone at United Initiators Canada Ltd. is responsible for complying with the laws and regulations that apply to the work we do globally. Employees may be subject to disciplinary action, up to termination, for violating the Code.

United Initiators Canada Ltd. personnel are encouraged to raise concerns over Code violations by contacting one, or more, of the following:

- Manager or another senior manager.
- The Human Resources Department.
- The Legal Department.
- The Compliance Officer.

Concerns may also be reported anonymously online at <https://united-initiators.integrityline.app/>, by faxing +49-89-74422-6319, or mailing them to the following address:

Compliance Officer
Dr.-Gustav-Adolph-Strasse 3
82049 Pullach
Germany

Upholding human rights is important to United Initiators Canada Ltd. and we value the rights of our employees globally. United Initiators Canada Ltd. complies with all wage and labour laws that are applicable in the regions where we operate. We do not use child or forced labour in any of our operations. United Initiators Canada Ltd. is committed to working with business partners who share these principles.

4.2 Supplier Code of Conduct

United Initiators Canada Ltd. is committed to long-term sustainable development in our business operations by focusing on environmental protection, social responsibility, ethical behaviour, and economic success. United Initiators Canada Ltd. expects the same commitment to internationally recognized environmental, social, and corporate governance standards from its suppliers in the value chain.

The [United Initiator's Supplier Code of Conduct](#), which applies to United Initiators Canada Ltd., sets forth the basic principles for supplier conduct globally. By entering into a business relationship with United Initiators Canada Ltd., suppliers accept and agree to fully comply with the Supplier Code of Conduct. Suppliers shall also ensure compliance throughout the value chain.

- Suppliers shall treat their employees fairly, with dignity and respect, and in accordance with fundamental human rights. They shall maintain an environment free of discrimination, abuse, unlawful practices, and harassment.
- Suppliers shall not tolerate, or benefit from, any forms of forced or involuntary labour, including compelled overtime, debt bondage, forced prison labour, modern slavery, or human trafficking.
- Suppliers shall not discriminate in hiring and employment practices on the grounds of race, color, gender, religion or philosophy, national origin, disability, age, trade union membership, sexual orientation, military status, genetic information, marital status, and gender identification or other characteristics as and where protected by applicable laws.

- Suppliers shall comply with all applicable child labour laws and shall not use, or support any use of, child labour, or other child exploitations.
- Suppliers shall respect their employees' freedom of association and the right to collective bargaining in accordance with applicable laws and regulations without fear of reprisals.
- Suppliers shall comply with all local working hour and wage laws and ensure that their employees are paid a fair wage sufficient to cover their minimum local living standards.
- Suppliers shall abide by all applicable laws and regulations related to conflict minerals (tin, tantalum, tungsten, and gold) and the sourcing thereof.
- Suppliers shall have systems in place to conduct the necessary due diligence to trace such minerals back to their origin, and upon request, provide evidence of accuracy and validity of the sourcing of the conflict minerals.

The principles in the Supplier Code of Conduct are a minimum requirement that apply to all United Initiator's suppliers worldwide including United Initiators Canada Ltd.'s suppliers. Suppliers must always comply with applicable international and national laws, regulations, and conventions. If applicable international and national laws, regulations, and conventions are stricter than the Supplier Code of Conduct, they shall prevail.

United Initiators Canada Ltd. reserves the right to conduct audits or assessments to ensure supplier compliance with the Supplier Code of Conduct. United Initiators Canada Ltd., and any third party appointed by United Initiators Canada Ltd., shall have the right to access all sites of the suppliers to perform such audits.

Any non-compliance with the Supplier Code of Conduct, as well as any concerns about illegal behavior or improper conduct, should be reported to the supplier's contact person at United Initiators Canada Ltd. or may also be reported as set forth in the United Initiator's Code of Conduct at <https://www.united-initiators.com/company/united-initiators-code-conduct>.

United Initiators Canada Ltd. reserves the right to discontinue any business relationship with any suppliers who has, directly or indirectly, breached the Supplier Code of Conduct, violated any applicable laws or regulations and failed to correct any such breaches or violations.

4.3 United Initiators Compliance Hotline

United Initiators Compliance Hotline is available to all United Initiators employees, including those employed by United Initiators Canada Ltd., as well as third parties, to make a report regarding ethics and compliance matters. United Initiators believes that fostering an environment of transparency and accountability is crucial for the success and sustainability of our company and our supply chain.

The Compliance Hotline serves as a dedicated channel for reporting potential compliance violations, allowing United Initiators Canada Ltd. personnel to share any suspected or actual

breaches of laws or internal regulations, including our Code of Conduct, securely and confidentially.

United Initiators will ensure the following:

- **Confidentiality:** United Initiators is committed to maintaining the confidentiality of the reporting person's identity and any third parties mentioned in the reports, to the extent legally permissible.
- **Anonymous Reporting:** Reports can be submitted anonymously, providing an additional layer of security for those who wish to maintain their privacy. Our Compliance Hotline also enables anonymous communication between the reporting person and our Compliance Department.
- **Protection against Retaliation:** We want to emphasize that we do not tolerate any form of retaliation against individuals who report in good faith. "Good faith" reporting means that your intentions are honest, and you provide all information you have and believe to be true. Regardless of the outcome of the investigation, any form of retaliation by colleagues, supervisors or others will be strictly prohibited.

The Compliance Hotline is administered by a third-party service that will forward a report to the United Initiators Compliance Department.

United Initiators Canada Ltd. personnel can submit reports directly to the online Compliance Hotline in a confidential and anonymous manner. Links to the Compliance Hotline are available on the external United Initiators website, on the United Initiators Intranet Legal & Compliance page, and directly at <https://united-initiators.integrityline.app>.

4.4 United Initiators Canada Ltd Purchasing Procedures (“Procurement Policy”)

United Initiators Canada Ltd. has a Procurement Policy which establishes the general rules and guidelines within which purchasing activities shall be conducted. The purpose of Procurement is to provide on time delivery of quality materials and services, while reducing costs and conducting business in an ethical and sustainable manner.

The Procurement Policy includes procedures for new supplier selection. Procurement is responsible for determining the applicability and assessing certain criteria related to the mitigation of forced labour or child labour risks. This includes determining if the supplier engages in business practices that comply with local regulations and meets the elements of United Initiator's Code of Conduct and social responsibility policies.

5. Forced Labour and Child Labour Risks in our Activities and Supply Chains

5.1 United Initiators Canada Ltd.'s Efforts to Manage Risk Within its Own Supply Chain

United Initiators Canada Ltd. is dedicated to conducting business in a manner that respects human rights and the well-being of all individuals involved in our supply chain. We recognize the importance of ethical practices within our operational and supply chain activities.

At this time, United Initiators Canada Ltd. has not conducted a risk assessment to identify areas within our business and supply chains that may have a potential risk of forced labour or child labour and hence, have not taken any steps to assess and manage those risks. Although we have not yet conducted a fulsome risk assessment across our supply chain, 98% of our suppliers are in regions that have a low risk for forced labour and child labour based on available statistics (see Section 3.3 of the report for a break-down of suppliers).

6. Measures Taken to Remediate Forced Labour or Child Labour

At present, United Initiators Canada Ltd. has not identified any instances of forced labour or child labour in our activities or supply chains. As such, we have not undergone the steps to remediate any harms of forced labour or child labour in the current Reporting Period.

United Initiators Canada Ltd. aims to progress towards developing remediation measures (should an instance of forced labour or child labour occur). We will strive to improve our approach to remediation and provide an update on our process in future Reporting Periods.

7. Remediating the Loss of Income to the Most Vulnerable Families

United Initiators Canada Ltd. acknowledges that efforts to prevent and reduce the risks of forced labour and child labour may have the unintended consequences of contributing to a loss of income for the most vulnerable families.

Currently, we are not aware of any instances to date where our efforts to mitigate the risk of forced labour and child labour in our business activities may have contributed to a loss of income for vulnerable families.

We recognize that clearly defining the expectations for remediation efforts is a key step in this process. We will strive to define the expectations for addressing remediation for individuals identified as victims of forced labour and child labour in future Reporting Periods.

8. Training Provided to Employees on Forced Labour and Child Labour

We acknowledge the importance of education and consciousness-raising within our team as key components in the fight against forced and child labour. Nevertheless, United Initiators Canada

Ltd. has not established a dedicated training initiative aimed at equipping our employees with the skills to identify and mitigate the risks associated with forced and child labour.

However, during the Reporting Period, United Initiators Canada Ltd. provided training to buyers on social and environmental issues within the supply chain (sustainable procurement training) which included reference to Germany's *Supply Chain Sourcing Obligations Act 2023*, as well as our commitment to the UN Global Compact. In addition, 89% of United Initiators Canada Ltd. employees had completed training on our Code of Conduct at the end of the Reporting Period, which is mandatory for all employees.

We may consider developing and implementing dedicated training on identifying and mitigating the risks associated with forced labour and child labour or integrating training into existing training processes.

9. Assessing Our Effectiveness

As this is the first year of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, United Initiators Canada Ltd. has not yet established a framework for measuring the effectiveness of our forced labour and child labour risk mitigation efforts. As our program matures, we remain committed to assessing the effectiveness of our actions in future Reporting Periods.

10. Board of Directors Approval and Attestation Statement

This Report was Approved by the Board of Directors of United Initiators Canada Ltd., pursuant to section 11(4)(b)(ii) of the Act.

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.

I have the authority to bind United Initiators Canada Ltd.



Signature

Eduard Hoozemans
CEO



Date