

May 25, 2025

## Annual Compliance Report on Forced Labor and Child Labor in Supply Chains

Based upon the requirements of Canadian Legislative Bill S-211 for the most recently completed financial fiscal year end date ending on 12/31/2024.

### ORIGINAL REPORT

With enthusiasm, we share this report highlighting our steadfast dedication to preventing forced labor within our supply chain. At **Kemira Water Solutions Canada, Inc.**, we understand the deep impact of forced labor or child labor and human rights. Our commitment to ethical business practices transcends mere compliance — it's ingrained in our core values.

Within these pages, we outline the thorough measures we've taken to identify, assess, and mitigate the risk of forced labor in our supply chain. Through transparency, accountability, and collaboration, we strive to establish a benchmark for responsible business conduct that exceeds regulatory standards. Our mission to abolish forced labor isn't just a corporate responsibility; it's an ethical, moral obligation we fully embrace.

As you explore this report, we invite you to join us on our journey of continual improvement and ethical leadership. Together, we can establish a supply chain built on principles of fairness, dignity, and respect for all. Thank you for your interest in our commitment to opposing forced labor. We eagerly anticipate your support in this vital endeavor.

### REPORT OVERVIEW

This is a single entity report to align with requirements of the Canadian S-211 Forced Labor and Child Labor reporting initiative. Kemira Water Solutions Canada, Inc. acts as the Resident Importer of Record for shipments into Canada using business number 101536233 RM0001. This report encompasses activities of Kemira Water Solutions Canada, Inc. for the most recent financial year beginning on January 1, 2024 and ending on December 31, 2024.

Kemira Water Solutions Canada Inc. has identified that it aligns with at least two of the three criteria noted within the S-211 legislation in at least one of its two most recent completed financial years and is responsible to initiate the report for this Canadian regulation and initiative.

### KEMIRA GROUP STATEMENT FOR SLAVERY AND HUMAN TRAFFICKING

Kemira Water Solutions Canada, Inc. is committed to conducting business in an ethical manner within our operations. This includes understanding the modern slavery risks that face us and addressing them in our business and supply chains. The next statement outlines how Kemira Group is driving commitment towards human rights.

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#### KEMIRA WATER SOLUTIONS CANADA INC

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May 25, 2025

**CONTENT:**

1. Our business and supply chains
2. Our key policies concerning our business relationships
3. Our management approach to human rights/ forced labor and child labor related matters
4. Training and capacity building
5. Business activities in 2024 to ensure compliance with our policies on business relationships

**OUR BUSINESS STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS**

Kemira Water Solutions Canada, Inc. is a leader in sustainable chemical solutions for water-intensive industries. Our customers include industrial and municipal water treatment operators, and pulp & paper industry among others. We provide the best-suited products and services to improve our customers' product quality, process, and resource efficiency. Our focus is on water treatment, renewable solutions, and digital services, by manufacturing and also importing water treatment chemicals into Canada from the Americas, EMEA and APAC regions. The Kemira values go beyond our products and services. Our values include being committed to customers' success, we drive performance and innovation, we care for people and the environment and we succeed together. Kemira's Code emphasizes that its decisions and actions must be guided by integrity and ethics. According to the company Code, that how we do things is even more important than what we do. The Code gives the organization and everyone working for Kemira the guidance and principles they need to adhere to the highest standards of integrity, legal compliance and ethical conduct. Being a responsible business means supporting internationally defined principles on human rights, labor conditions, the environment and anti-corruption. We are dedicated to customer success by offering our expertise to add value to their processes. We care for people and the environment by putting safety first in all our actions and seeking to be a role model for business partners in safety, environmental responsibility and human rights. Through policies and collaborative partnerships, we strive to ensure that our products and services are produced and delivered without exploiting or endangering the well-being of any individual. Our aim is to contribute to a world where every person can live and work with dignity, free from exploitation and force."

Kemira has a new operating model, effective from January 1, 2025 onwards. The new operating model has three business units: Water Solutions, Packaging and Hygiene Solutions and Fiber Essentials.. Kemira's products are dependent on refined mineral, fossil, renewable and recycled raw material feedstocks. Our Sourcing function is responsible for strategic spend management, while our Supply Chain Management function provides supply chain related services on a regional level to our business segments. Geographically, approximately half of our suppliers reside in Europe. The entity's structure consists of region heads that manage the day to day operations of the entity including, commercial, finance, supply chain, sourcing, health & safety, product regulation.

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**KEMIRA WATER SOLUTIONS CANADA INC**

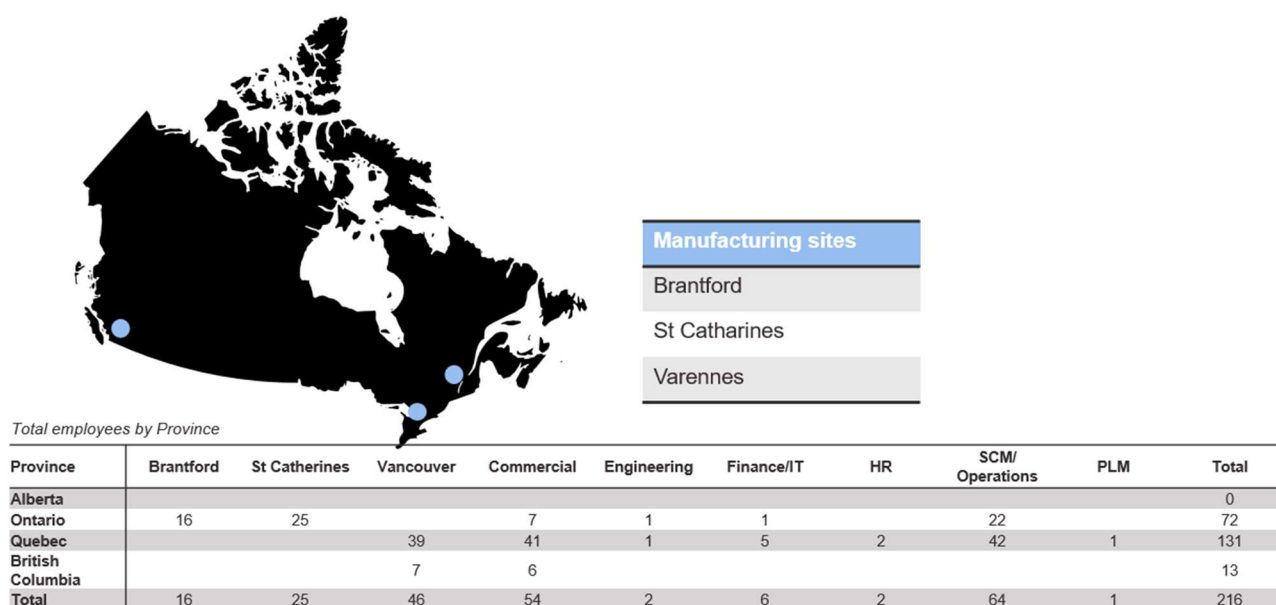
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Figure 1 Kemira Manufacturing Sites and Employee Count



## OUR KEY POLICIES CONCERNING OUR BUSINESS RELATIONSHIPS

Kemira's position in the value chain is utilizing primary chemicals and further refining those into specialty chemicals. Kemira has identified high risk countries within its upstream and downstream value chains which have an increased risk of the use of child and forced labor. The increased risk is particularly evident in the APAC region. The high-risk countries have been defined by a thirdparty, utilizing a set of different human rights and labor rights related indices that are publicly available (Business social compliance initiative 2022, Labor Rights index, Global Rights index). Our supplier risk and compliance management defines the requirements for suppliers to do business with Kemira, as well as provides tools and processes for mitigating sustainability risks with our suppliers.

Kemira Code of Conduct sets the minimum standards of expected behavior for our employees and business partners, including respect and support to human rights and states *"never use any form of forced or child labor"*. Our internal policies and procedures provide more detailed guidance to steer our daily work and decision-making. Sustainability is embedded into all operations, including Strategy and Enterprise Risk Management (ERM). From the Enterprise Risk Management perspective, integrating sustainability is crucial to mitigating risks and to ensuring long-term resilience. The materiality assessment helps to prioritize the most important risks in the annual review process. Kemira has systematic procedures in place to evaluate and address the

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environmental, social and governance material impacts of its own operations and business relationships. Kemira's sustainability work is based on day-to-day responsible practices in all our operations. Our corporate sustainability priorities are based on the most material impacts across our business; on the increasing expectations of our customers, investors and other stakeholders and on our commitment to the Kemira Code of Conduct and internationally agreed sustainability principles.

We are committed to the principles of The Universal Declaration of Human Rights and the United Nations' Global Compact and we expect our suppliers and business partners to share these principles. We seek to ensure that materials used in our products come from socially responsible sources. We do not tolerate, contribute to, or facilitate any activity that fuels conflict or violates human rights of forced labor and child labor. According to Kemira's Sourcing and Procurement policy, all of our suppliers must follow our Code of Conduct for Business Partners (CoC-BP) in relation to all of their dealings with Kemira. The CoC-BP sets standards for business integrity, respecting human rights and appropriate working conditions, and protecting the environment. The CoC-BP is communicated to all suppliers through the ordering process as part of Kemira terms and conditions. Supplier adherence to these principles is controlled in different stages of our Sourcing processes starting from the new supplier screening / new vendor creation process, to contracting where the commitment to our CoC-BP is integrated in the contract templates. The focus of supplier management is described in three main processes: Supplier Segmentation, Supplier Performance Evaluations and the Vendor Value Program. Kemira suppliers are segmented into four categories: strategic, critical, volume and base suppliers. They are prioritized based on multi-factor risk criteria to better help to manage supplier relationships and to plan actions for necessary risk mitigation. The Supplier Performance Evaluations program collects and provides regular feedback to suppliers, on both their operational and sustainability performance. The Vendor Value Program aims to develop capabilities that will enable the identification, partnering with and management of suppliers, along the various value chains associated with Kemira's product lines. Kemira supplier risk and compliance management defines the requirements for suppliers to do business with Kemira, as well as provides tools and processes for mitigating sustainability risk with suppliers, e.g sustainability assessments and audits. Finally, we have continuous monitoring in place for those contracts exceeding certain spend thresholds to make sure we are reasonably covered. Reporting on any misconduct relating to Kemira or our business partners can be sent to email address [compliance@kemira.com](mailto:compliance@kemira.com).

## REMEDIATION MEASURES TAKEN TO REMEDIATE ANY FORCED LABOR OR CHILD LABOR

In the Kemira Sustainability Policy we also set standards for our approach to human rights issues. The policy covers topics like safe working conditions, ensuring human rights, no forced labor or child labor and creating a diverse workplace and inclusive culture. During 2024 Kemira did not receive any allegations of forced labor, child labor, human trafficking or any other forms of modern slavery in its own operation or in its value chain through its Ethics and Compliance hotline or other grievance channels. In the supplier audits no incidents of modern slavery were identified.

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## POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO HUMAN RIGHTS, FORCED LABOR AND CHILD LABOR

Respect for human rights (including slavery, human trafficking, child forced labor)	
International frameworks	<ul style="list-style-type: none"> <li>• Ecovadis Gold Medal</li> <li>• United Nations Global Compact</li> <li>• The Universal Declaration of Human Rights</li> <li>• International Labour Organizations (ILO) Core Principles</li> <li>• United Nations Guiding Principles on Business and Human Rights</li> <li>• OECD Due Diligence Guidance</li> <li>• Responsible Care ®</li> </ul>
Code of Conduct	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Code of Conduct for Business Partners</li> </ul>
Policies and standards	<ul style="list-style-type: none"> <li>• Sustainability policy</li> <li>• Logistics and transportation policy and processes</li> <li>• Sourcing and procurement policy</li> <li>• Recruitment policy</li> <li>• Investigation procedure</li> <li>• Modern Slavery Statement 2024</li> </ul>
Hazards and risks	<ul style="list-style-type: none"> <li>• Potential violations of human, child and labor rights and unethical business practices can impact Kemira's reputation and thus financial position.</li> <li>• Based on human rights impact assessment, amongst main human, child or forced labor rights risks are e.g. production and raw material sourcing of suppliers and supply chain partners.</li> </ul>
Risk/Hazard management *	<ul style="list-style-type: none"> <li>• Ethics and compliance Hotline for raising a concern or reporting potential misconduct.</li> <li>• Supplier audits for quality and Corporate Social Responsibility (CSR) by third party</li> <li>• Mandatory Code of Conduct and Human Rights for Business trainings.</li> <li>• Reporting system in place for violations of Code of Conduct.</li> <li>• Human Rights impact assessment carried out</li> <li>• Mechanisms, processes and procedures supporting the precautionary principle</li> <li>• Grievance mechanisms</li> <li>• Emphasized focus through corporate programs on safety and diversity and inclusion</li> <li>• Internal Human Rights Council for discussions and improvement of human rights related processes</li> </ul>

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	<ul style="list-style-type: none"> <li>Strategy and Enterprise Risk Management (ERM).</li> </ul>
Due diligence/ Remediation measures	<ul style="list-style-type: none"> <li>In human rights issues, reporting to Audit Committee of Board of Directors.</li> <li>Suppliers are required to accept Kemira's Code of Conduct to business partners. Kemira also constantly monitors, assesses and audits its supplier base by performing periodic checks either through routine processes or annual internal audits by competent sourcing members. Based on conducted assessments prioritized supplier are invited to take more detailed assessment or audit.</li> </ul>
Assessing effectiveness / Outcomes of policies and due diligence processes	<ul style="list-style-type: none"> <li>Human Rights issues identified and mitigated in own operations and value chain.</li> <li>Meeting on group level the minimum safeguards of most recognized human rights guidelines and guiding principles.</li> <li>Sourcing &amp; Procurement policy, processes and procedures mitigate and prevent supplier's violations related to any type of non-legal practices, they also ensure that key suppliers are operating at or above the levels required by Kemira from the economical, environmental, social and human rights point of view.</li> </ul>

## TRAINING AND CAPACITY BUILDING

The contents of the business conduct policies are part of the training for all employees at the beginning of their employment and there is repeat training, typically every two years. The Code of Conduct is trained to all employees and the other policies are trained to selected target groups of employees based on risk assessment. The training includes the key contents of Kemira's policies, standards and procedures and explains how to perform work in accordance with Kemira's policies and what consequences may follow from not complying with the policies. The main channel to deliver training is a globally used electronic training platform which can be used to keep track of the trainings offered to and taken by each employee. The platform enables Kemira to monitor that mandatory trainings are completed in a timely manner by the designated target groups.

## KEY ACTIVITIES IN 2024 TO ENSURE COMPLIANCE WITH OUR POLICIES ON BUSINESS RELATIONSHIPS

- Code of Conduct training of Kemira employees:** Every employee is expected to comply with Kemira's Code of Conduct. All people managers and leaders are responsible for implementing the Code within their teams. Since 2013, we have required all of our employees to regularly complete the Code of

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May 25, 2025

Conduct training, which is currently available in 19 languages. We also train selected employee groups on more specific compliance matters, such as anti-bribery, competition compliance and insider information.

- **Sustainability assessments of suppliers:** We continued enrolling new suppliers into our Sustainability program. Results with low scores are reviewed together with suppliers and improvement plans are made accordingly. In most cases, low scores are due to lack of supporting documentation provided by the vendor to the assessment company.
- **Corporate Social Responsibility audits of suppliers:** Yearly, we conduct one Corporate Social Responsibility audit. Usually in audits, results are being reviewed together with suppliers and improvement plans are created and followed up accordingly as part of our supplier management practices.
- **Quality audits of suppliers:** Direct material large spend suppliers also undergo quality audits, which include management systems, workplace health and safety standards, production quality and supply security.
- **Kemira proudly received the EcoVadis Gold medal rating**, demonstrating that sustainability management is well integrated into our business model, covering Environment, Labor & Human Rights, Ethics, and Sustainable Procurement. A total score of 73 out of 100 puts Kemira among the top 1% of companies in the world. **Integrated management system covering our operations:** Kemira has a principle that all operations under our Integrated Management System meet the international standards ISO 9001:2015 for Quality, ISO 14001:2015 for Environment, and ISO 45001:2018 for Occupational Health and Safety. Kemira's Energy Management System is certified according to ISO 50001:2018 for selected sites. Our Integrated Management System is externally audited through a three-year audit scheme focused on internal and external management systems audits, including manufacturing sites, major office locations and R&D centers.

\* Please refer to Risk/Hazard management in the Policies and due diligence processes in relation to forced labor and child labor

- **Remediation of loss of income:** As a measure taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chains, Kemira avoids child labor by using responsible business methods as mentioned in the above reporting. During 2024 Kemira did not receive any allegations of forced labor, child labor, human trafficking or any other forms of modern slavery in its own operation or in its value chain through its Ethics and Compliance hotline or other grievance channels. In the supplier audits no incidents of modern slavery were identified.

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## ATTESTATION

This report has been reviewed and approved by the appropriate governing body of **Kemira Water Solutions Canada, Inc.**.

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.

Kelly Forrester  
VP, SCM Americas  
May 25, 2025



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I have the authority to bind Kemira Water Solutions Canada, Inc.