



Omya Canada Inc.
2024 Annual Report – Forced Labour and Child Labour (Modern Slavery)

Our Business

This Annual Report is made pursuant to Canada's *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (the "Act") for the period of January 1 – December 31, 2024, and has been approved by the Board of Directors of Omya Canada Inc.

The Act requires Omya's reporting Canadian entities to report on their activities in relation to the production, sale, and distribution of goods, both inside and outside of Canada, and the importation of goods into Canada. Omya Canada Inc. ("Omya Canada") is a wholly owned subsidiary of Omya AG Switzerland and the only entity in the Omya Group that has a reporting obligation under the Act. However, the Omya Group of companies has relevant policies and processes in place that are adhered to by Omya Canada, and such relevant policies are included in this report.

The following sections of this report are structured to follow the reporting information required under the Act.

1. *What steps has Omya taken 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 reporting entity or of goods imported into Canada by the reporting entity?*

Omya has reviewed its business and identified aspects which could have a risk associated with modern slavery practices. We have identified the activities within our business which could be exposed to modern slavery risks. These include our quarry and production operations, and the supply of materials and products. Being a subsidiary of a global entity, Omya has policies, directives, and procedures throughout our organization which govern the way we do business, and reinforce our commitment to opposing modern slavery and abusive or exploitative practices. These policies, directives, and procedures are discussed further in this report and include:

- the Omya Code of Conduct;
- the Omya Business Partner Code of Conduct
- the Group Risk Policy;
- the Whistleblowing Directive & Reporting Hotline
- the Corporate Sustainability Policy;
- the Procurement Directive; and
- the Vendor Management Procedure.

If reported, we have a systematic process of investigating and correcting any root causes. As at the date of this statement, we have not identified any instances of modern slavery in our operations or supply chain and we will continue to remain vigilant in opposing modern slavery. Should such concerns be raised, we shall investigate, take appropriate action to address these concerns, and review the effectiveness of our actions in consultation with relevant parties.



2. *Below is a summary of Omya Canada's structure, activities, and supply chains.*

Our business involves the quarrying and processing of calcium carbonate, as well as importing and distributing specialty chemical additives and minerals. For a detailed description of Omya's business activities, please refer to www.omya.com. Omya Canada operates two quarrying and manufacturing sites in Canada, located in Perth, Ontario and Saint-Armand, Quebec, as well as having a sales staff located in those provinces. In total, Omya Canada employs approximately 100 people.

The Omya Group has regional offices located in Mason, Ohio and Miami, Florida, which includes employees who provide support to Omya Group companies located throughout the Americas, including Omya Canada. The Group is headquartered in Oftringen, Switzerland.

3. *What are Omya Canada's policies and due diligence processes in relation to forced labour and child labour?*

We are guided by Omya's values of modesty, courtesy, integrity and perseverance. We are expected to use good judgement, high ethical standards, and be reliable and honest when conducting business. We are committed to preventing and/or managing risks associated with modern slavery in our business.

We oppose modern slavery such as illegal child labour, involuntary servitude, and all other forms of abusive or exploitative labour practices.

Several of our policies, procedures and directives play a role in ensuring responsible business practices in our supply chain:

- a) Our Code of Conduct: is a policy document to which all persons working for or with Omya commits to our values of modesty, courtesy, integrity, and perseverance. This means that our business is conducted in an ethical, legal and socially responsible manner, and which opposes modern slavery. This Code of Conduct was updated in 2024 to be more user-friendly. Our Code specifically calls out our commitment to only employ those of the legal working age and not to engage in any form of exploitative or hazardous child labour, and our commitment to ensure our suppliers adhere to these principals as well;
- b) Our Business Partner Code of Conduct: is a policy document that was also revised and updated in 2024 and includes specific admonitions against the use of child labour and other unethical labour practices.
- c) the Group Risk Policy: establishes a risk management approach to achieving business objectives and in meeting legal and social obligations. Through this policy, we have considered our business activities and any exposure to modern slavery risks, and taken measures to prevent or manage such risks;
- d) the Whistleblowing Directive & Reporting Hotline: this directive and associated hotline provides a platform for Omya employees or any 3rd parties to report any perceived or



- actual incident or violation, including any human and labor rights violations. The Reporting Hotline provides ways to make reports anonymously and in several languages to protect the confidentiality of reporters;
- e) the Corporate Sustainability Policy: demonstrates our commitment to a sustainable way of working which includes balancing economic growth with ecological balance and social progress;
 - f) the Procurement Directive: provides a framework ensuring that our procurement practices and those of our business partners align to the principles from the Omya Code of Conduct and take reasonable measures to ensure their business is ethical, legal and socially responsible; and
 - g) the Vendor Management Procedure: ensures equitable selection of suppliers. Suppliers are required to complete a Supplier Declaration form and go through multiple stages of approvals before they are established as a vendor. Once established as a vendor, our suppliers understand their commitment to transparency and shall be available for an annual evaluation as required by us.

4. Which parts of Omya Canada's business and supply chains carry a risk of forced labour or child labour being used and what steps has Omya Canada taken to assess and manage the risk?

The Omya Group has operations in many countries, including Australia, which has had an anti-slavery law, the *Australian Modern Slavery Act*, in place since 2018. Omya has therefore taken steps to review our global, regional, and local supply chain to assess areas of risk. As part of our commitment to continuous improvement and in recognition of the dynamic nature of the global supply chain, Omya Group is actively increasing the percentage of suppliers that we register and analyze for risks through EcoVadis. We are also actively investigating additional technologies to review our supply chain risks and ensure we are utilizing best practices to continually assess these risks.

5. What measures has Omya Canada taken to remediate any forced labour or child labour?

As at the date of this statement, we have not identified any instances of modern slavery in our operations or supply chain and we will continue to remain vigilant in opposing modern slavery. Should such concerns be raised, we shall investigate, take appropriate action to address these concerns, and review the effectiveness of our actions in consultation with relevant parties.

Omya acknowledges the importance of providing avenues for individuals, whether they are Omya employees, customers, vendors, or other 3rd parties, to report concerns they may identify in their day-to-day activities. In 2023, Omya strengthened our reporting channel by issuing the Omya Whistleblowing Directive and implementing an augmented reporting system, allowing parties to quickly and easily report concerns about actual or suspected misconduct that can affect any of the Omya Group of companies or the well-being of people. This includes a secure website, email inbox and a hotline that is available



24 hours a day, seven days a week, and can accommodate multiple languages. Further, in 2024, we created the Omya Global Compliance Center, a website that contains information about Omya's compliance policies, including our Code of Conduct and our Business Partner Code of Conduct, as well as information about our Whistleblower hotline and a QR code to access the Whistleblower hotline directly.

6. *Has Omya Canada taken any measures to remediate the loss of income to the most vulnerable families resulting from any measures taken to eliminate the use of forced labour or child labour in its activities or supply chains?*

Omya Canada has not had need to take any such measures, as Omya Canada is not aware of any forced labour or child labour in its supply chain.

7. *What training has Omya Canada provided to employees on forced labour and child labour?*

In 2024, we conducted refresher trainings on our Business Partner Code of Conduct. We also provided specific training for all employees on our Procurement Policy, which includes specific discussions regarding our non-tolerance of forced and child labour. Our employees are required to complete mandatory training on the Code of Conduct as part of the company's overarching compliance program. Each document is clear in relation to the expectation that no forced or child labour is tolerated in Omya's operations or the operations of its supply chain/vendors.

Further, all suppliers are expected to sign our Supplier Declaration of Business Conduct. This includes acknowledgement from the supplier that forced, prison or involuntary labour is not permitted and there is zero tolerance for any instance of child labour.

8. *How does Omya Canada assess its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains?*

Omya Canada recognizes the importance of assessing the effectiveness of our programs, to gauge not only our compliance with the relevant laws, but also our adherence to our corporate values. Omya Canada uses our review of supplier questionnaires and audits to evaluate our effectiveness, as well as our communications with our first level suppliers, not only to evaluate their performance in relation to our policies, but also the policies they have in place for their suppliers.

Omya Canada anticipates leveraging the work of our colleagues in Australia, the UK, and the US to further identify ways to assess the effectiveness of our programs.