

INTEPLAST BAGS AND FILMS CORPORATION

REPORT ON MODERN SLAVERY

FINANCIAL YEAR ENDED DECEMBER 31, 2023

1. Introduction

Overview:

Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “**Act**”) mandates that entities disclose the measures they have implemented over a reporting period to mitigate the risks of forced and child labour (together, “**modern slavery**”) in their operations and supply chains. This is the joint report of Inteplast Bags and Films Corporation (“**IBFC**”), a British Columbia corporation, Number: BC0968708, and its subsidiaries: Matra Plast Industries Inc. (“**Matra Plast**”), a New Brunswick corporation, Number 513066; and, W. Ralston (Canada) Inc., a federal corporation, Number 318612-1 (“**Ralston**”, and together with IBFC and Matra Plast, “**Inteplast**”) (herein referred to as “we”, “us”, or “our”). This report covers Inteplast’s fiscal year ending December 31, 2023. Inteplast has no obligation to report on modern slavery in any other jurisdiction.

About Inteplast:

IBFC is based in and has operations in Vancouver, British Columbia, and also has operations in Saint John, New Brunswick; Matra Plast has facilities in Quebec; and, W. Ralston has operations in Alberta, Ontario and Quebec. Inteplast is an integrated plastics manufacturer. Our diverse bundle of plastic products, from trash can liners to press to close bags, support an array of markets including foodservice, packaging, grocery, retail, sanitation, industrial, and graphic arts. As a leader in the plastics industry, Inteplast meets the criteria for reporting under the Act.

Commitment:

Inteplast is committed to the ethical and responsible conduct of our business. We strongly oppose modern slavery, and our corporate culture, which embodies integrity and mutual respect, is in line with the Act’s efforts to promote human rights and dignity.

Scope:

This report covers the efforts undertaken by Inteplast in 2023 to identify and diminish the risk of forced and child labor within its operations and supply chains, both inside and outside of Canada.

2. Company Structure and Supply Chains

Organizational Structure:

IBFC is a subsidiary of Inteplast Group Corporation, a Texas corporation, with its principal office in Livingston, New Jersey, USA. Matra Plast and Ralston are wholly owned subsidiaries of IBFC. All Inteplast policies, practices and procedures are applicable to all of these entities.

Inteplast’s Supply Chain:

Inteplast’s supply chain consists of:

- **Primary suppliers**, of which there are only a few, that provide the equipment (including machines and parts), raw materials (chiefly resin) and packaging components (mainly corrugated boxes) used in plastics production and distribution. Historically, Inteplast has enjoyed long-standing relationships with its primary suppliers.
- **Secondary suppliers**, also very limited in number, that provide goods related or complementary to ours that we do not produce, but are in demand by our customers.
- **Tertiary suppliers**, that provide us products or services consumed locally, such as technology services, janitorial services and office supplies.

3. Company Policies

Generally:

Inteplast is steadfast in its commitment to conducting its business ethically, and this concept is codified in our longstanding policy on business ethics as well as our adoption of, and adherence to, the United Nation’s Universal Declaration of Human Rights.

Modern Slavery Specific Policies:

For 2023, Inteplast did not have in place a specific policy addressing modern slavery. As referenced above, however, Inteplast had previously adopted the United Nation’s Universal Declaration of Human Rights, the overarching principles of which abhor worker exploitation and slavery. For example:

Article 3 provides: “Everyone has the right to life, liberty and security of person.”

Article 4 states: “No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.”

Article 5 holds: “No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.”

Article 23 maintains:

1. “Everyone has the right to work, to free choice of employment, to just and favourable conditions of work...”
3. “Everyone who works has the right to just and favourable remuneration...”

Article 24 affirms: “Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.”

Due Diligence:

During 2023 Inteplast did not have any specific due diligence processes in place to identify modern slavery in our supply chain. We relied instead on the principle of “know your vendor” to mitigate the chances that modern slavery could have been occurring in our supply chain. Moreover, nearly all of our larger consumer products company customers subjected many of our secondary suppliers to social audits, including for modern slavery. In some cases, these audits were conducted directly by our customers, and in other cases by third parties engaged by our customers. These audits, coupled with our constant interaction with all of our suppliers, importantly, including repeat visits to secondary supplier production sites gave us a high level of confidence that modern slavery was not occurring in our supply chain.

4. Assessing and Managing the Risk of Modern Slavery

In 2023, Inteplast did not have a specific policy directing the assessment and management of modern slavery in our workforce and supply chains. We do, however, as a matter of course, in response to the requirements of our customers, evaluate the potential risks of modern slavery both internally and externally:

Internally:

Inteplast is highly confident that the risk of modern slavery among its employees is nil. Our Human Resources department observes rigorous hiring practices, which include background checks and verification processes. Further, this team polices compliance with minimum age and wage, as well as overtime requirements. Our Health and Safety department promulgates and enforces safety protocols and directs frequent training sessions on workplace safety to confirm that our facilities meet safety standards and that our employees are protected. Taken together, these departmental undertakings ensure compliance with local, state, provincial, and federal labor and safety laws and diminish any risk of modern slavery at Inteplast.

Externally:

Notwithstanding our contractual relationships with reputable suppliers, Inteplast recognizes that if there is any part of our business that carries a risk of modern slavery, it is in our secondary supply chain. We know that our exposure to the risk of modern slavery among secondary suppliers increases proportionately with remoteness. This risk is mitigated as noted above by the social audits conducted by our customers, as well as by our site visits to, and monitoring of, our secondary suppliers.

Measures Taken:

In 2023, Inteplast did not implement any specific programs to mitigate the risks of modern slavery in our workforce, operations, and supply chains. Rather, we relied on the above mentioned pre-existing foundational policies and practices to address modern slavery: our Business Ethics Policy; our adoption and adherence to the United Nation’s Universal Declaration of Human Rights; our Human Resources and Health and Safety departments’ policies, practices and procedures; and, our continuous engagement and monitoring of secondary suppliers.

5. Remediation Actions

In 2023, Inteplast did not identify any modern slavery in our business or supply chains. Accordingly, we did not engage in any remedial actions to address any forced or child labour. Therefore, we did not make any effort to remediate the loss of income to the most vulnerable families resulting from any such action.

6. Training

In 2023 Inteplast did not provide any specific training on forced labour and child labour.

7. Effectiveness Assessment

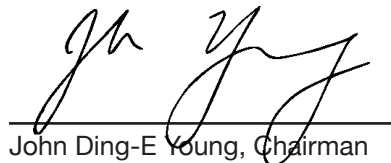
Inteplast, as a manufacturing company, is dedicated to the process of continuous improvement. While the chief focus of our continuous improvement efforts is in production processes, the concept permeates our culture and is embedded in our corporate governance and overall operations. As a result, a formal assessment of our effectiveness in ensuring that forced labor and child labor are not being used in our business and supply chains was not conducted in 2023.

8. Approval and Attestation

In accordance with paragraph 11(4)(a) of the Act, this report has been reviewed and approved by the Board of Directors of Inteplast Bags and Films Corporation. This report is also available on our company website at: <https://www.inteplast.com>

On behalf of the board of directors of Inteplast Bags and Films Corporation and not in my personal capacity, and in compliance with the Act, in a particular section 11 thereof, I hereby attest that I have reviewed the information contained in this report for the listed entities. Based on my knowledge and after exercising reasonable diligence, I confirm that the information provided in this report, insofar as it relates to Inteplast Bags and Films Corporation and its subsidiaries Matra Plast Industries Inc. and W. Ralston (Canada) Inc., is true, accurate, and complete in all material respects for the purposes of the Act for the reporting year noted above.

I have the authority to bind Inteplast Bags and Films Corporation.



John Ding-E Young, Chairman

September 19, 2024