

## Forced Labor and Child Labor Report 2023

This report is made pursuant to Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act. This report details the actions taken to reduce the risk of forced labour and child labor in our supply chains.

# 1. ORGANISATIONAL STRUCTURE

This statement is made by Metokote Canada ULC ("Metokote Canada") on behalf of itself.

PPG Industries, Inc. ("**PPG**"), through itself and its subsidiaries, is a global manufacturer of paints, coatings and specialty materials.

## 2. BUSINESS OPERATIONS AND SUPPLY CHAINS

#### 2.1 Metokote Canada

The principal activities of the Metokote Canada are on-site coatings services within several customer manufacturing locations as well as at company-owned regional service centers. Metokote Canada is a wholly owned subsidiary of PPG Industries, Inc., a corporation incorporated in the United States under the laws of Pennsylvania.

### 2.2 Supply chains of Metokote Canada

- Raw materials (used to manufacture our products)
- Toll manufactured products
- Finished goods
- Goods for re-sale (tools and equipment related to coatings)
- Paint for re-sale
- Indirect goods and services
- Skilled and unskilled labour
- Marketing and logistics
- IT systems & solutions



# 3. RISKS OF MODERN SLAVERY PRACTICES

In this report, we refer to forced labour and child labour together as **modern slavery**. We have identified that the following area gives rise to the highest modern slavery risk:

• raw materials which are used in coatings manufacture and which are associated with industries and/or are sourced from countries estimated to have the highest prevalence of modern slavery.

# 4. ACTIONS TAKEN TO ADDRESS RISKS OF MODERN SLAVERY

We have appropriate policies, processes and targeted initiatives in place that underpin our commitment to addressing the risks of modern slavery or human trafficking in our supply chains or in any part of our business.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to address the risks of slavery and human trafficking taking place in our supply chains. We have the following policies, processes and targeted initiatives in place relevant to modern slavery:

- Supplier Sustainability website which can be found at: <u>https://www.ppg.com/sustainability/en-US/supplier-sustainability</u>
- Supplier Sustainability website and policies which can be found at: <u>https://procurement.ppg.com/Programs/Supplier-Sustainability</u>
- Global Code of Ethics which can be found at: <u>https://www.ppg.com/about-ppg/en-US/ethics</u>
- Global Supplier Code of Conduct which can be found at: <u>https://procurement.ppg.com/Supplier-Network/Global-Supplier-Code-of-Conduct</u>
- Procedures for on-boarding new suppliers
- Supplier ratings
- Reporting policies
- Global Code of Ethics training and specific trainings on modern slavery
- Global initiatives such as those described below in section 12

# 5. Global Code of Ethics ("GCOE")

### 5.1 Summary

PPG's GCOE outlines PPG's commitment to conduct business in an ethical manner that respects human rights. In particular, the GCOE requires compliance with all laws prohibiting forced, compulsory or child labour, human trafficking and employment discrimination.



# 5.2 Application

- a) All employees within PPG are required to comply with the GCOE. In addition, many of PPG's employees complete, on an annual basis, a GCOE online training course.
- b) The GCOE is also a key pillar of PPG's Supplier Sustainability Policy (see Section 7 below) with which all suppliers and contractors are expected to comply.

### 5.3 Responsibility and enforcement

Ultimate responsibility for enforcement of the GCOE rests with PPG's Chief Compliance Officer. PPG's Compliance department (or its delegated investigator) will investigate any reported violation of the GCOE by an employee or third party. In the case of a substantiated violation by an employee, this may result in disciplinary action being taken by the relevant PPG Human Resources department up to and including dismissal (in accordance with the relevant Human Resources policy and local law).

## 6 GLOBAL SUPPLIER CODE OF CONDUCT ("GSCC")

#### 6.1 Summary

- a) PPG expects its valued suppliers to operate their business practices in accordance with PPG's ethics and integrity expectations. As such, PPG has implemented a Global Supplier Code of Conduct ("GSCC"). The GSCC applies to any persons providing goods and services to PPG, including suppliers and contractors.
- b) The GSCC is a key pillar of PPG's Supplier Sustainability Policy (see Section 7 below). The GSCC imposes minimum compliance standards with respect to business integrity, labour practices, associated health and safety, and environmental management. It is intended to complement the GCOE. The GSCC covers a wide range of standards but those specific to this annual statement are set out in the table below.

#### 6.2 Specific GSCC requirements

Forced or compulsory labour	<ul> <li>Suppliers must:</li> <li>Prohibit all forms of forced or compulsory labour</li> <li>Maintain and promote fundamental human rights</li> </ul>
Child labour	<ul> <li>Suppliers must:</li> <li>Prohibit the use of child labour</li> <li>Adhere to the minimum employment age limit defined by national law or regulation</li> </ul>



	Comply with relevant International Labour Organization
	(ILO) standards
Human trafficking	Suppliers are prohibited from engaging in any form of human trafficking
Rights of minorities	Suppliers shall respect the legal rights of minorities and indigenous people, including land, forest and water rights and will not participate in any illegal forced eviction practices
Discrimination,	Suppliers must:
harassment, diversity and inclusion	<ul> <li>Promote a diverse workforce and provide a workplace free from discrimination, harassment or any other form of abuse</li> </ul>
	<ul> <li>Create a work environment in which employees and business partners feel valued and respected for their contributions</li> </ul>
Environment, health and	Suppliers must:
safety	<ul> <li>comply with all applicable environment, health and safety, and transportation laws and regulations</li> </ul>
	<ul> <li>Provide safe and healthy working conditions</li> <li>Proactively manage health and safety risks with the goal of providing an incident-free environment where occupational injuries and illnesses are prevented</li> <li>Implement management systems and controls that identify hazards and assess and control risk related to their specific industry</li> </ul>
Freedom of association	Suppliers must:
	<ul> <li>Respect employees' right to freedom of association and collective bargaining, consistent with local laws</li> <li>Respect employees' rights to join or refrain from joining associations and worker organizations</li> </ul>
Wages, hours and	Suppliers must:
benefits	• Treat employees fairly, including with respect to wages,
	working hours and benefits
	<ul> <li>Comply with all applicable legal and regulatory requirements and apply sound employee relations practices</li> </ul>
Responsible mineral sourcing	Suppliers are expected to be in compliance with the PPG Responsible Minerals Sourcing Policy

# 6.3 Responsibility and enforcement

a) We expect suppliers to immediately report any suspected violations of our GSCC through the PPG Ethics Helpline or other specified channels. In the event of any non-compliant activity or violation of the GSCC, the supplier may be required to provide a detailed corrective action plan to address the deficiency.



We reserve the right to terminate our relationship with any supplier that cannot demonstrate compliance with the GSCC.

b) Employees, suppliers and other third parties can anonymously report suspected human rights violations within our operations and those of our suppliers through the PPG Ethics Helpline. The helpline is managed by an independent, third-party firm, and we investigate each allegation thoroughly and fairly.

c) Ultimate responsibility for enforcement of the GSCC is the Global Procurement Organization led by the Chief Procurement Officer for PPG.

## 7. PPG'S SUPPLIER SUSTAINABILITY POLICY ("SSP")

Our commitment to human rights and eradicating slavery from the PPG supply chain is closely aligned with our commitment to make PPG's businesses more sustainable in terms of their compliance with applicable laws and adherence to internationally recognised environmental, social and corporate governance standards.

We acknowledge that our success in achieving these Goals will be dependent upon the full support of the global supplier base for which PPG's Global Sustainability Committee has issued its SSP.

### 8. PROCEDURE FOR ON-BOARDING A NEW SUPPLIER

New suppliers undergo an on-boarding process requiring their compliance with the GSCC and SSP and completion of a new supplier qualification form which includes questions on child and forced labour; human rights violations and safety in workplace violations.

All suppliers are required to sign up to ePro (a company-wide supplier portal). Within ePro, all suppliers are required to comply with the GSCC and SSP and to keep their vendor profiles up to date (which includes informing us of any breaches of the GSCC or SSP or informing us of any changes to the answers previously given to the qualification form). Accordingly, we are able to monitor any changes to their vendor profiles.



## 9. SUPPLIER RATINGS

We use EcoVadis, a leading third-party ratings organization, to evaluate supplier sustainability performance, which includes questions relating to child and forced labour, human trafficking, employee health and safety, working conditions, discrimination and harassment.

Beyond EcoVadis, we have shifted the focus of our internal supplier evaluations to review our most critical and highest risk suppliers. We identify suppliers for more in-depth review based on country and industry-specific risk.

#### **10. REPORTING POLICIES**

#### **10.1 PPG employees**

PPG employees and contractors are required to comply with the GCOE. Employees are encouraged and expected to report all suspected violations of the GCOE or the law to the appropriate levels of management, including the PPG's Ethics and Compliance Office. Several reporting options are offered, including the PPG Ethics Helpline, which is a confidential freephone and online reporting service maintained by an independent third party. Any retaliation – whether direct or indirect – against any employee who raises a good faith concern is grounds for discipline up to and including dismissal.

#### 10.2 PPG suppliers

Under the GSCC, suppliers are required to report suspected violations of the GSCC to the Chief Compliance Officer or PPG's Ethics Helpline promptly if a violation of the GSCC is ever in question. In the event that a supplier recognizes any non-compliant activity or violation of the GSCC, the supplier may be required provide a detailed corrective action plan to address such deficiency.

### **11. TRAINING**

All PPG employees are regularly trained in global ethics and business conduct. In addition, many are required to complete a GCOE annual online refresher training course, which is accompanied by a test which they must pass in order to complete the training.



In 2019 and 2022, we launched a modern slavery e-learning course aimed at employees ranked from the most senior management to middle management/ mid-grade specialists with assigned email addresses in certain countries and in the global Procurement department.

### **12. GLOBAL INITIATIVES**

Global initiatives are relevant because of the Metokote Canada's global supply chain. Their inclusion in this statement is consistent with our assessment that PPG's greatest risk exists in its global supply chain for raw materials.

#### 12.1 Responsible Mica Mining initiative

A portion of the pigments supplied by PPG's pigment suppliers incorporate mica, which is extracted from mines located in India. In general, PPG uses pigments containing natural (as opposed to synthetic) mica in its formulations, especially with respect to those relating to its automotive OEM, automotive refinish and aerospace business units. The Terres des Hommes International Federation highlighted in several of its published reports in 2016 that Indian mines were using child labour. PPG subsequently took steps to establish that none of PPG's pigment suppliers sourced mica from Indian mines that used child or any other forms of forced or compulsory labour. The investigation led to PPG becoming, on 31 January 2017, a voting member of the Responsible Mica Initiative Group (see link: http://www.responsible-mica-initiative.com). This is a Do-Tank which aims to eradicate child labour and unacceptable working conditions in the Indian mica supply chain by joining forces across industries.

The following link to the Responsible Mica Initiative Group's Annual Report 2023 shows the actions taken by the group in 2023: <u>https://responsible-mica-initiative.com/shining-a-light-on-progress-the-responsible-mica-initiatives-2023-annual-report-unveiled/</u>

### 12.2 Responsible Minerals Sourcing Policy

"Conflict Minerals" currently include cassiterite, columbite/tantalite, and wolframite (the most common derivatives of which are tin, tantalum and tungsten, respectively) and gold – commonly referred to as 3TG. These Conflict Minerals are of concern because mines in the Democratic Republic of the Congo (the "**DRC**") and surrounding countries are important sources of these minerals. Some of these mines are controlled by armed groups that finance their conflicts through mining activities. The U.S. Securities and Exchange Commission (the "**SEC**") adopted Conflict Minerals reporting and disclosure requirements to further the humanitarian goal of ending violent conflict and inhumane treatment in the DRC and surrounding countries, which have been partially financed by the exploitation and trade of Conflict



Minerals. Other minerals, including, cobalt, mica, and silicon may also be sourced from areas where there is a risk of human rights abuses in the supply chain of these minerals. In 2023, PPG replaced its Conflict Minerals Policy with a new Responsible Minerals Sourcing Policy, which may be accessed at <a href="https://sustainability.ppg.com/en-US/responsible-minerals-sourcing">https://sustainability.ppg.com/en-US/responsible-minerals-sourcing</a>.

As further described in PPG's Supplier Code of Conduct and Responsible Minerals Sourcing Policy, PPG is committed to ethical business conduct and responsible sourcing. We are working diligently with our global supply chain partners to ensure compliance with the SEC's Conflict Minerals rules and to source minerals from ethical suppliers. However, the international supply chain for minerals is complex, and the tracing of them is challenging. Many of the raw materials that contain Conflict Minerals and minerals of concern used by PPG passed through a variety of intermediaries before reaching PPG. PPG does not purchase directly from smelters; therefore, we must rely upon our suppliers to identify the sources of Conflict Minerals and minerals of concern and to declare the Conflict Mineral status of their products.

Consistent with PPG's commitment to social responsibility and sustainability, PPG has established a process to facilitate compliance with applicable laws mandating disclosure of Conflict Minerals, including membership in the Responsible Minerals Initiative ("**RMI**") and conducting due diligence on source and chain of custody using RMI's Responsible Minerals Assurance Process (the "**RMAP**"). We commit to making reasonable efforts in requiring our suppliers to:

- conduct due diligence on its supply chain in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the RMAP and to determine the source of any Conflict Minerals or Conflict Mineral containing product supplied to PPG;
- provide the Conflict Minerals source information reasonably requested by PPG necessary to support our due diligence and reporting obligations under the SEC's Conflict Minerals rules;
- notify us if a product supplied to PPG contains Conflict Minerals originating in the DRC or surrounding countries; and
- commit to being or becoming "conflict free."

We also work with the suppliers of other minerals of concern to trace the origin of these minerals in an effort to ensure that our suppliers are meeting their obligations under the GSCC.

Suppliers who are not able to provide adequate information about the source of any Conflict Minerals or other minerals of concern in the products supplied to PPG shall be evaluated by PPG's Global Procurement department and may be denied future PPG business. Furthermore, our Supplier Code of Conduct and the Responsible Minerals Sourcing Policy provide that we may terminate any agreement with any supplier that cannot eliminate products containing Conflict Minerals or other minerals from the supply chain, or which funds or supports armed conflict or human rights abuses.

For PPG's most recent conflict minerals report, please see <u>https://sustainability.ppg.com/en-US/responsible-minerals-sourcing</u>



# Certification

This statement is made pursuant to Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act and constitutes our report for the financial year 1 January to 31 December 2023. It was approved by the board of Metokote Canada and is signed by Vincent Rea on behalf of that Company.

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Vincent Rea General Manager Metokote Canada ULC

## **METOKOTE CANADA ULC**

## This Attestation is made for METOKOTE CANADA ULC

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.

Full name: Vincent Rea

Title: General Manager- Canada

Date: May 29, 2024

I have the authority to bind the listed Entity.

(3) pa Signature: \_\_