



SECURING YOUR JOURNEY  
ALLIÉ DE VOTRE PARCOURS

850, montée de Liesse  
Montreal (Québec) Canada H4T 1P4  
Tel: 514 341-3550 fax: 514 341-1292  
www.recochem.com

## RECOCHEM INC. Modern Slavery Statement for Financial Year ending in April 2024

### I. Reporting entity

This Modern Slavery Statement (this “**Statement**”) was prepared by Recochem Inc. (“**Recochem**”), pursuant to the *Modern Slavery Act 2018* (Cth).

Recochem is incorporated under the laws of British Columbia (Canada) and is a registered foreign company with the Australian Securities & Investments Commission (ABN 69 010 485 999).

Recochem aims to maintain a high standard of ethical business practices. We recognize the importance of upholding human rights, and we are committed to doing our part in combating modern slavery in our operations and supply chains.

This Statement describes the actions Recochem has taken to prevent and reduce the risk of modern slavery in its operations and supply chains, during the company's most recently ended financial year starting May 1<sup>st</sup>, 2023, and ending April 30<sup>th</sup>, 2024.

### II. Our Company – Structure, Activities and Supply Chains

Recochem was founded by Joseph Kuchar in 1951 in Montreal, as a manufacturer and distributor of naphthalene products. Today, we manufacture and distribute a variety of products, offering solutions primarily in the automotive after-market, thermal management and household products industries. Our product range includes coolants, anti-freezes, windshield washer fluid, and automotive care products designed to enhance performance and efficiency in a variety of applications.

Recochem is a global company with offices and subsidiaries in many parts of the world. It is part of a broader global group of companies which has approximately 1,745 employees worldwide.

Recochem operates manufacturing and distribution sites across Canada, including in Quebec, Ontario, Alberta and British Columbia, and a research and development laboratory in Alberta.

Recochem's Australian branch (“**Recochem Australia**”) was established in 1975 with a registered office located at 1809 Lytton Rd, Lytton, Queensland, 4178, Australia. It has grown over the years to supply solvents and water-based products to both household and industrial markets. It is also a major supplier of automotive products, particularly engine coolants, to the Australian and Pacific regions. Recochem Australia has its main manufacturing plant located in Brisbane, which is supported by a plant in Perth. The company operates warehousing facilities in Sydney and Melbourne, and maintains a sales presence in Sydney, Melbourne, and Adelaide. Recochem Australia employs approximately 130 employees and





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also engages labour hire providers. The percentage of the workforce engaged through labour hire constitutes less than 10% of Recochem Australia's overall employees.

Recochem Australia sources materials and equipment from a variety of suppliers across different geographic regions, including but not limited to China, India, Singapore, Malaysia, Europe and North America.

### III. Our Mission and Core Values

Recochem's stated mission is to be a global solutions provider in the areas of thermal management, emissions control, automotive appearance chemicals, and safety, as well as offering household solutions. We are committed to being a strong corporate leader by partnering with our customers and suppliers to find solutions for our customers' needs. We respect our environment and provide a safe workplace that offers growth opportunities for our employees.

Our core values are the foundation of our corporation and lead our business:

- Deliver value to our Customers
- Focus on Safety, our Environment and Quality
- Maintain Integrity
- Act with a Sense of Urgency
- Teamwork and Mutual Respect

We believe that acting with integrity is essential to maintaining our high standards of ethical business behaviour.

### IV. Risk of Modern Slavery in Our Supply Chains

Recochem's manufacturing operations are conducted in compliance with applicable labour and human rights laws. Accordingly, Recochem currently views the risk of modern slavery in its own manufacturing operations to be low, but remains vigilant to monitor for any changes in circumstances that could increase risk.

Like most manufacturing companies, as stated above, Recochem sources materials and equipment from a variety of suppliers in different geographic regions around the world. Recochem may not have full visibility into the respective upstream supply chains of its suppliers. The company acknowledges that there is risk that exploitative labour conditions, including modern slavery can occur at any stage of the upstream supply chains, with risk level varying based on factors such as product category, country/region of manufacture, and the nature and sophistication of the governance frameworks and internal policies and due diligence procedures implemented by each supplier in the chain.



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## V. Policies and Due Diligence Processes to Address Modern Slavery Risks

Recochem's internal policies reflect our commitment to maintaining fair and lawful employment practices which respect every employee's human rights. Our policies articulate the fundamental importance of operating in a socially responsible and ethical manner and of compliance with laws and regulations to the success of our business, including:

- Adopting fair employment practices;
- Providing a safe workplace for all employees;
- Providing fair compensation, benefits and working conditions to all employees;
- Ensuring that employees have freedom of association, including for collective bargaining;
- Ensuring that employment at Recochem is freely chosen and that legal employment eligibility is verified prior to hiring;
- Commitment to compliance with applicable laws, standards, and practices as well as international standards;
- Ensuring that employees have the opportunity to report human rights issues freely and confidentially; and
- Fostering environmental sustainability in our operations.

During the FY2024 reporting period covered by this Statement, Recochem adopted a [Global Code of Ethics and Business Conduct](#) ("Code of Ethics") which specifically addresses the issues of forced and child labour. It specifies that Recochem is committed to respecting human rights and strictly prohibits the use of child labour and forced labour in its operations and supply chains, and that any use of child labour or forced labour is in direct violation of the Code and will be subject to disciplinary action and potentially termination of our business relationship, as will any other violation of human rights or applicable labour laws.

The Code encourages employees and business partners to be vigilant and ask questions if they suspect any instance of child labour and/or forced labour, and to immediately report any suspicions or instances of child labour or forced labour either internally or within a supplier or stakeholder to the Human Resource Business Partner and a member of Recochem's Legal Team.

Our Code of Ethics applies to everyone working at Recochem and our global affiliates, as well as to our suppliers, customers and other business partners and directs stakeholders on what to do if instances of forced or child labour are discovered. We seek to do business with partners who maintain high standards of integrity and commitment to human rights in our operations and supply chains and we are clear on our behavioural expectations from our employees and business partners in this regard.





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## VI. Actions Taken to Combat Modern Slavery in our Supply Chain

Recochem condemns modern slavery in all its manifestations and is committed to taking proactive steps to prevent and address these issues. During the reporting year ended April 30, 2024, Recochem's steps to prevent and reduce forced labour and child labour risk were focused on compliance with applicable labour and employment laws and workplace human rights protections applicable to Recochem's operations.

Recochem has implemented initiatives and process improvements to its modern slavery due diligence, including the following key elements:

- (1) **Employee Training** – Recochem delivered Code of Ethics training in February and March 2024 that included instruction to employees on identifying and preventing instances of modern slavery in our operations and supply chain and such training is provided on an ongoing basis as part of the onboarding of new employees.
- (2) **Supplier Due Diligence and Audits** – Recochem Australia, through its quality processes, evaluates potential and existing suppliers and is currently implementing a specific segment dedicated to the assessment of its suppliers with regards to their commitment of the abolition of modern slavery. We request and evaluate information about prospective suppliers' modern slavery compliance procedures in our supplier on-boarding process. Recochem Australia's procurement team requests modern slavery statements from our suppliers via a supplier approval form, which is an integral part of our supplier approval process. Our procurement team utilizes this form to confirm compliance with modern slavery statement obligations by potential suppliers.
- (3) **Ethical Compliance Platforms** – Recochem Australia actively engages with recognized ethical compliance platforms to enhance our transparency with accountability in this area. Specifically, in the retail sector, we report our anti-slavery efforts through the SEDEX platform, where we have completed a Self-Assessment Questionnaire (“SAQ”). Recochem Australia undergoes assessments of its business on a regular basis through SEDEX and underwent a site assessment in March 2023. In the industrial sector, we are a member of EcoVadis, a European-driven platform, and have also submitted an SAQ that has been released in the form of a sustainability report. We conduct these assessments biennially to ensure that our suppliers adhere to our commitment to ethical practices and to continually improve our approach to modern slavery risks.





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## VII. Remediation Measures

During the FY2024 reporting period, Recochem did not identify any instances or significant risks of modern slavery in its operations or supply chains that would necessitate remediation measures. We remain vigilant in assessing risk on an ongoing basis to identify circumstances in which remediation may be required.

Recochem reviews its codes and policies mentioned herein on a regular basis.

## VIII. Assessing Effectiveness

During the FY2024 reporting period, Recochem did not have any formal processes in place to evaluate effectiveness of our compliance processes with respect to modern slavery risk. Our focus in this first reporting period was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. In recent months, we have been actively reviewing our modern slavery policies, procedures and due diligence practices to identify areas of improvement (as discussed briefly in section VI above) and on working on developing frameworks and processes to ensure we can review the effectiveness of these actions. These efforts will be discussed in greater detail in next year's report and will include consideration of ways that the company can continue to evaluate the effectiveness of existing procedures on an ongoing basis.

## IX. Approval

### Principal Governing Body Approval

This Statement was approved by the Board of Directors of Recochem Inc. in its capacity as the principal governing body of Recochem on October 29, 2024.

### Signature of Responsible Member

This statement is signed by Jason Colwell in his role as the Chief Executive Officer of Recochem Inc. on October 29, 2024.

DocuSigned by:

8AB9E902416C411  
Jason Colwell

Chief Executive Officer, Recochem Inc.  
October 29, 2024

