

**Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff (the Act)**

Reporting Entity: The International Group, Inc.

Financial Reporting Year: January 1, 2023 – December 31, 2023

Original or Revised Report: Original

Business Number: 1000064015

Joint Report: No

Subject to reporting requirements under supply chain legislation in another jurisdiction? No

**Structure, Activities and Supply Chains:**

The International Group Inc. (“IGI” or the “Company”) is a Canadian corporation with subsidiaries in Canada and the United States.

IGI’s principal business is the refining, blending and marketing of petroleum wax products used in industrial and commercial applications such as corrugated packaging, distilled wax for thermal actuation and thermostatic control devices, homogenous waxes for tires and rubbers, candles, soy and palm waxes, and microcrystalline waxes.

IGI operates a fully-integrated supply chain including unique US sourced waxy feedstocks, refining, blending and terminal facilities.

IGI’s primary vendors are large multi-national petroleum producers, with more than 95% of imports being from either Canada or the U.S. The remaining supply is imported internationally from China, Greece, India, Malaysia and Taiwan.

**Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour**

The Company’s commitment to protecting human rights is outlined in its Code of Business Conduct and Environmental, Social and Governance (ESG) statement. IGI’s Code of Business Conduct is presented to customers by its commercial team. IGI’s ESG statement is publically available via the Company’s website (<https://igiwax.com/sustainability/>).

From a supplier management perspective and as an ISO accredited company, IGI has detailed procedures related to supplier management. These include but are not limited to:

- Supplier Qualification
- Approved supplier lists
- Various other quality management tools and procedures

These procedures ensure IGI only transacts with reputable, well-run suppliers.

Policies and due diligence processes specifically addressing forced and child labor are being developed in 2024.

**Parts of Business and Supply Chains that Carry a Risk of Forced Labour or Child Labour Being Used and the Steps Taken to Assess and Manage Risk**

Assessments of which parts of its business and supply chain that carry a risk of forced or child labor were not completed in the 2023 reporting year.

The Company's assessment in 2024 includes, but is not limited to:

- Categorizing suppliers using a tiered system (i.e. direct suppliers; direct service providers; and brokers)
- Review of suppliers by geographic location, industry, mode of transportation and dollar value purchases
- Review of supplier's publically available information (i.e. ESG statements)
- Sending and obtaining signed attestation from select suppliers that they do not engage in the user of forced labour or child labour

#### **Measures Taken to Remediate Forced Labour or Child Labour**

No known instances of forced or child labor in 2023.

#### **Measures Taken to Remediate the Loss of Income to the Most Vulnerable Families that Results From Any Measure Taken to Eliminate the Use of Forced Labour or Child Labour in Activities and Supply Chains**

No known instances of lost income as a result of forced or child labour in 2023.

#### **Training Provided to Employees on Forced Labour and Child Labour**

IGI has internal hiring policies and processes to prevent the employment of underaged workers. This includes requiring a minimum hiring age of 18 years at all plant locations and identity verification.

In Canada, new hires must produce their social insurance card to Human Resources on their first day of work. In the US, new hires must complete Form I-9, Employment Eligibility Verification and two pieces of identification, such as a passport or driver's license.

We have started the process of developing training for employees that is specific to forced and child labour in 2024.

#### **How the Entity Assesses its Effectiveness in Ensuring Forced Labour and Child Labour are Not Being Used in its Business and Supply Chains**

No formal assessments of IGI's effectiveness in ensuring forced labour and child labour were not being used in its business and supply chains were completed in 2023.

Policies and procedures surrounding this are being developed in 2024.

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.

*John Reucassel*

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John Reucassel

President & Chief Executive Office

I have the authority to bind The International Group, Inc.