

# **Cabot Canada Ltd. and Cabot Plastics Canada LP** **Supply Chains Act Report (2023)**

## **ABOUT THIS REPORT**

Cabot Canada Ltd. ("**Cabot Canada**") and Cabot Plastics Canada LP ("**CPC**") have prepared this report (the "**Report**") being submitted pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") for the financial year ended September 30, 2023. This is a joint Report made on behalf of Cabot Canada and CPC (collectively the "**Cabot Reporting Entities**"). All references in this Report to "**Cabot**", "**we**", "**us**", or "**our**" refer to the Cabot Reporting Entities unless otherwise indicated. This Report has not been externally assured.

This Report describes the steps taken to enhance transparency in our supply chains by outlining the steps taken during the 2023 financial year to prevent and reduce the risk that forced labour or child labour ("**Modern Slavery**") is used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada. This has been done in accordance with the mandatory reporting criteria outlined in Sections 11(1) and 11(3) of the Act.

The Cabot Reporting Entities do not report under similar legislation in any other jurisdiction. However, the Cabot Reporting Entities' parent company, Cabot Corporation, issues statements pursuant to similar legislation in the United Kingdom and California.

## **INTRODUCTION**

Cabot strives to conduct its business ethically and with integrity. We value human rights and seek to comply with all applicable laws and standards related to labour practices and human rights in all our operating locations. We also recognize and respect international human rights principles aimed at promoting and protecting human rights, including:

- the *United Nations' Universal Declaration of Human Rights*;
- the International Covenant on Civil and Political Rights;
- the International Covenant on Economic, Social and Cultural Rights; and
- the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Cabot does not tolerate any form of Modern Slavery and is subject to a number of global policies enacted at the parent level to support our respect for fundamental human rights, fair labour practices and the prohibition on child and forced labour.

## **STRUCTURE, ACTIVITIES AND SUPPLY CHAINS**

### ***Structure***

Cabot Corporation is a leading global specialty chemicals and performance materials company headquartered in Boston, Massachusetts, USA. The company's principal products are rubber and specialty grade carbon blacks, specialty compounds, fumed metal oxides, inkjet colorants, and aerogel. Shares of Cabot Corporation are listed on the New York Stock Exchange (NYSE: CBT). Cabot Corporation does not carry on business in Canada.

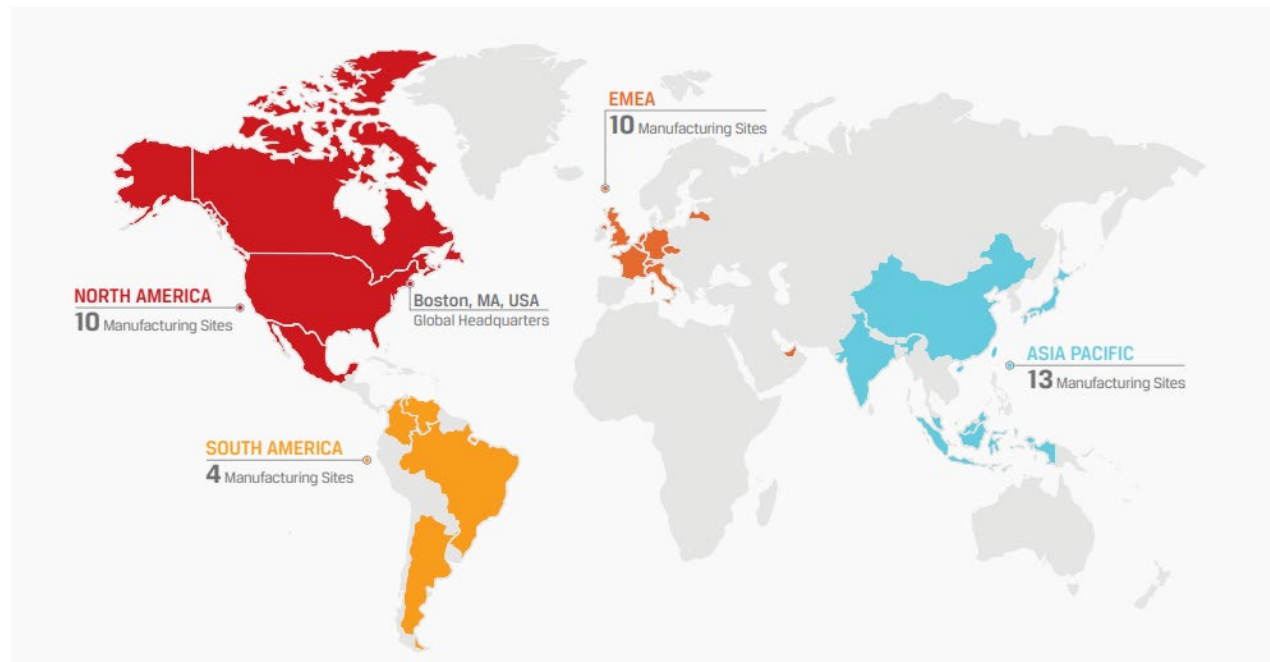
Cabot Canada is a Canadian subsidiary located in Sarnia, Ontario, specializing in the production of carbon blacks for elastomer reinforcement for North American customers. Cabot Canada

employs more than 100 people and participates in a variety of charitable initiatives in the community throughout the year.

CPC is a limited partnership and Canadian subsidiary of Cabot Corporation, located in Saint-Jean-sur-Richelieu, Quebec. CPC joined Cabot Corporation's global specialty compounds business in 2017 and is a leading North American producer of black masterbatches for applications in the automotive, infrastructure and agricultural industries.

### **Activities and Operations**

Cabot Corporation and its affiliates have manufacturing facilities and operations at 37 sites in more than 20 countries around the globe, as shown in Figure 1 below. Cabot Corporation has 51 subsidiaries located worldwide in Pacific Asia (19), Europe, Middle East and Africa (13), North America (14) and South Africa (5). Globally, Cabot Corporation employs approximately 4,300 employees, with 41% of employees located in North and South America (61% of whom are in the United States), 33% in Asia Pacific, and 26% in Europe, Middle East and Africa. Of this global employee population, 43% are employed in manufacturing roles.



*Figure 1: Cabot Global Operations*

Cabot Corporation's business is currently organized into two reportable segments: Reinforcement Materials and Performance Chemicals

Cabot Canada is engaged in manufacturing carbon black for both the Reinforcement Materials and Performance Chemicals segments. Carbon black is used in tire rubber, plastics, inks, toners etc. The use of carbon black extends the life of rubber products and reduces our use of natural resources.

CPC manufactures black masterbatches for Cabot Corporation's Performance Chemicals segment for applications in the automotive, infrastructure and agricultural industries.

Our broad range of innovative products helps us advance our customers' products in a wide range of industries. Details of our Reinforcement Materials and Performance Chemicals are set out below:



#### **Reinforcement Materials**

**Reinforcing Carbons:** industrial rubber products, tires

**Engineered Elastomer Composites (E2C®):** industrial rubber products, tires



#### **Performance Chemicals**

**Specialty Carbons:** adhesives, batteries, coatings, displays, inks, plastics, toners

**Fumed Metals Oxides:** adhesives, batteries, coatings, cosmetics, inks, pharmaceuticals, polishing slurries sealants, silicone elastomers, toners



**Battery Materials:** advanced lead-acid, lithium-ion batteries for electric vehicles, consumer electronics, and energy storage systems

**Inkjet Colorants & Inks:** commercial and industrial printing, corrugated packaging, inkjet printing



**Specialty Compounds:** plastics for use in agriculture, automotive, consumer products, electronics, industrial, and infrastructure

**Aerogel:** batteries, coatings, industrial insulation

### ***Our Supply Chains***

Cabot Corporation's operations depend on a complex global supply network of more than 10,000 suppliers worldwide that directly support our operations. Our suppliers provide a wide range of goods and services, including raw materials; chemical additives; process equipment; packaging materials; logistics services; maintenance, repair, and operations; engineering; and facility and professional services. Our suppliers are managed by our global procurement organization, within our Global Business Services function, including our feedstock sourcing teams.

For our Reinforcement Materials division, the principal raw material used in the manufacture of our reinforcing carbons is composed of residual heavy oils derived from petroleum refining operations, the distillation of coal tars, and the production of ethylene throughout the world. Natural gas is also used in the production of our reinforcing carbons.

For our Performance Chemicals division, the principal raw material used in the manufacture of our specialty carbons and conductive additives are composed of residual heavy oils derived from petroleum refining operations, the distillation of coal tars, and the production of ethylene throughout the world. Natural gas is also used in the production of our specialty carbons. As product purity is one of the most critical requirements for conductive carbons, we obtain raw materials for those products from select key suppliers.

In total, in 2023, the Cabot Reporting Entities purchased goods and services from 572 suppliers based in 10 countries. Of those purchases, approximately 98% percent were with suppliers based in Canada or the United States. These suppliers provided us with various goods and services, including the following general categories of goods and services: equipment and supplies, packaging, maintenance services, transportation and logistics, chemicals, and feedstock.

## **POLICIES AND DUE DILIGENCE**

Cabot Corporation has implemented and enforces a number of global policies to support its commitment to fundamental human rights, fair labour practices and the prohibition on child and forced labour. The policies and procedures discussed in this report, including the Cabot Code of Business Ethics (the “**Code**”), the Supplier Code of Conduct (the “**Supplier Code**”), the Supplier Qualification Process, the Human Rights Policy, and the Reporting Hotline apply to all entities in the Cabot organization, including Cabot Canada and CPC (the “**Cabot Group**”). Accordingly, the Cabot Reporting Entities rely on the supply chain processes used by the Cabot Group globally, which assess suppliers.

### *i. Code of Business Ethics*

Cabot Corporation has a comprehensive Code of Business Ethics which applies to the Cabot Group’s Board of Directors, employees, consultants, contractors, suppliers, and other business partners. It is based on a basic set of principles - each person is expected to meet the highest ethical standards in conducting Cabot business, comply with applicable laws and regulations, and act in accordance with Cabot’s values. As stated in the Code of Business Ethics, we believe in doing business with suppliers and others who demonstrate high standards of ethical business behavior. In particular, with respect to Labor Practices and Human Rights, the Code of Business Ethics states:

*We support and value human rights and are committed to complying with all applicable laws and standards relating to labor practices and human rights in all of our operating locations. This includes laws relating to child and forced labor.*

The full text of the Code of Business Ethics can be found online, [here](#).

### *ii. Supplier Code of Conduct*

We recognize that our overall social and sustainability impact often depends on decisions made in our supply chains. For this reason, Cabot Corporation implemented a Supplier Code of Conduct in 2010 that has been distributed across the global supply chain in 14 languages. The Supplier Code of Conduct expressly prohibits the Cabot Group’s suppliers from using forced labor of any kind. In particular, with respect to Labor Practices and Discrimination, the Supplier Code of Conduct expects suppliers to comply with any local or national labour laws regarding compensation and working hours. The Cabot Group values diversity and respects equal opportunity in employment. The Cabot Group will not tolerate any supplier who engages in unlawful employment discrimination, child labor or forced labor practices.

The full text of Cabot’s Supplier Code of Conduct can be found online, [here](#).

*iii. Supplier Qualification Process*

The Cabot Group has processes in place to help Cabot source from suppliers that share the Cabot Group's values regarding respect for human rights, integrity and sustainability. To facilitate understanding, implementation and enforcement of the Cabot Group's policies, the Cabot Group conducts in-person training and review of the Supplier Code of Conduct with key suppliers on a periodic basis. The Cabot Group also uses an internal supplier qualification process for new suppliers and periodically re-qualifies current suppliers to obtain current, accurate and complete information about the supply chain.

*iv. Office of Compliance and Reporting Hotline*

Cabot Corporation has an Office of Compliance that is responsible for the coordination of the Cabot Group's compliance with laws and regulations, the Code of Business Ethics and other policies, and for receiving and investigating reports of misconduct or non-compliance and to recommend actions to address misconduct or non-compliance that is established. Employees are encouraged to contact the Office of Compliance to ask questions, raise concerns and report violations of the Cabot Group policies or the law. The Cabot Group also maintains a reporting Hotline that is available to all employees globally seven days a week, 24 hours per day, that is staffed by trained third party representatives with access to interpreters.

*v. Human Rights Policy*

The Cabot Group strives to uphold human rights across its operations, affirming its dedication to fostering a positive work environment and respecting the rights of all individuals. Aligned with international standards such as the UN Universal Declaration of Human Rights and the International Labour Organization ("ILO") Declaration on Fundamental Principles and Rights at Work, the Cabot Group reviews its employment practices for compliance with both local regulations and globally recognized labour standards.

The Cabot Group has implemented a Human Rights Policy that prohibits forced labour, human trafficking, child labour, and discrimination of any form, emphasizing equal treatment and diversity in the workplace. In particular, Cabot's Human Rights Policy states:

*We do not tolerate any form of exploitation of labor, forced or bonded labor, human trafficking, or other forms of modern slavery. We are strictly opposed to all forms of child labor, as identified in ILO Convention No. 138. We comply with laws and standards related to labor practices in our office and operating locations.*

The full text of the Human Rights Policy can be found online, [here](#).

*vi. Standard Purchase Order Terms and Conditions*

The Cabot Group's Standard Purchase Order Terms and Conditions expect suppliers to demonstrate ethical business behavior, as well as compliance with the Supplier Code of Conduct. There is also a provision giving the Cabot Group the right to audit, or have audited, a supplier's books and records to verify the supplier's compliance with the Supplier Code of Conduct. The Standard Purchase Order Terms and Conditions for North America can be found online ([here](#)).

*vii. EcoVadis*

At year end 2022, Cabot Corporation had enrolled 60 of our 182 identified critical suppliers into the EcoVadis third-party platform and are actively working toward a 100% participation rate. This process will help provide a holistic view of our supply chain's environmental and social impacts and provide information from which we expect to take strategic actions to mitigate risk and drive improvements with our business partners.

## **POTENTIAL RISKS IN OUR OPERATIONS AND SUPPLY CHAINS**

### ***Potential Risks in Our Operations***

Cabot considers the risk of Modern Slavery practices occurring within our operations to be low considering the in-depth policies, procedures and enforcement mechanisms that govern our day-to-day operations and employment relationships. Cabot's operations are also located wholly within Canada, a jurisdiction that has robust labour, employment and human rights law, but also a low prevalence of child and forced labour, ranking 17 out of 160 countries according to the 2023 Global Slavery Index ("GSI"), which can be found online [here](#).

### ***Potential Risks in Our Supply Chains***

Cabot directly benefits from the policies and supplier qualification processes implemented at the parent level designed to assess compliance with applicable laws in its respective supply chains. We recognize that risks of Modern Slavery are inherent to all supply chains, including ours. However, we rely on the policies and processes implemented and enforced by Cabot Corporation to identify and reduce these risks. Accordingly, we view the risks in our supply chains as low.

Cabot actively manages Modern Slavery risks through the observance of the policies and procedures listed in this Report.

During the Reporting Period, Cabot has not identified any instances or allegations of Modern Slavery within its own work force or its direct supply chains, nor has it been made aware of any such risks in its broader supply chains. Therefore, no remedial measures were required, including those related to remediating the economic impacts of remedial actions on the most vulnerable families.

## **TRAINING**

Cabot and its suppliers benefit from the company-wide training provided as part of the Cabot Group's broader compliance and communication programs.

At a company-wide level, Cabot's employees undergo training on the Cabot Group's policies, including mandatory annual training on Cabot's Code of Business Ethics. In addition, the Cabot Group's purchasing function conducts additional training for its members responsible for supplier management on the importance of the supplier qualification processes.

## **ASSESSING EFFECTIVENESS**

In 2023, as part of the Cabot Group, we continued to make progress to increase transparency across our global supply chains and focused on aspects such as total spend, single source and the specific needs of our business operations as we continued to review our list of critical suppliers to better focus our efforts on relationships with the highest impact potential. The Cabot Group also engaged with a third party to conduct sustainability assessments to evaluate our critical



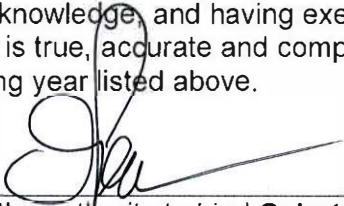
suppliers using methods that meet the Global Reporting Initiative Standards and the principles of the United Nations Global Compact.

As Cabot continues the development of its program to prevent and reduce the risks of Modern Slavery in its supply chains and operations in 2024, it will consider additional measures, where appropriate, to assess the effectiveness of our processes.

### APPROVAL & ATTESTATION

This Report was approved by the Board of Directors of Cabot Canada Ltd. on May 30, 2024, pursuant to section 11(4)(a) of the Act.

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.



I have the authority to bind **Cabot Canada Ltd.**

Dean Pearson

Director, Cabot Canada Ltd.

May 30, 2024

This Report was approved by the Board of Directors of Tech Blend Corporation as the general partner of Cabot Plastics Canada LP on May 30, 2024, pursuant to section 11(4)(a) of the Act.

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.



I have the authority to bind **Cabot Plastics Canada LP**

Patric Thibodeau

Director of Tech Blend Corporation as the general partner of Cabot Plastics Canada LP

May 30, 2024