

**Precision Concepts Parent, Inc.
Reporting Year 2023
Canada Modern Slavery Act Report**

Requirement (a) – Structure, activities, and supply chains

Structure

Precision Concepts Parent Inc (“the Company”), a Delaware corporation, owns and manages subsidiaries engaged in the manufacturing of packaging products for the personal care, amenity and household products, and food and beverage industries, with operations in Canada, Costa Rica, and the United States. The Company’s subsidiaries include:

Precision Concepts International LLC – North Carolina, USA, corporate management
Precision Concepts LLC – North Carolina, USA, holding entity
Precision Concepts (Lawrenceburg) LLC – Indiana, USA, manufacturing
Precision Concepts (Mebane) LLC – North Carolina, USA, manufacturing
Precision Concepts (Prescott) LLC – Arizona, USA, manufacturing
Precision Concepts (Miami) LLC – Florida, USA, manufacturing
IntraPac (Plattsburgh) Inc – New York, dormant entity
Precision Concepts Canada Corporation – Ontario, Canada; Alberta, Canada, manufacturing
Casanay Desarrollos, S.L. – Spain, holding entity
Envases Comerciales S.A. – Costa Rica, manufacturing

The Company is wholly owned by ONEX Corporation, ONCAP Investment Partners, and certain members of management. As of December 31, 2023, the Company has 989 employees with 272 employees in the US, 263 employees in Canada, and 454 employees in Costa Rica.

Activities

The operating subsidiaries of the Company manufacture goods by way of injection molding, blow molding, and extrusion processes. Raw materials including but not limited to various resins, liners, color additives, and miscellaneous componentry are sourced from vendors in multiple countries to produce goods. Finished goods are sold and distributed primarily into the United States (\$104M USD), Canada (\$26M USD), and Costa Rica (\$39M USD), but minimally in various other countries in Europe, Central and South America as well (\$16M USD). Goods sold into Canada are comprised of plastic bottles, jars, caps, and closures, and injected molded applicators.

Supply Chain

The Company’s supply chain is comprised of many suppliers who are sourcing materials throughout North America and Asia. The primary purchased material is plastic resin, in the form of polyethylene terephthalate, polypropylene, high-density polyethylene, and low-density polyethylene. The company additionally sources colorant additives for resin, corrugate, and secondary packaging components. See Appendix A for further information.

Requirement (b) – Policies and due diligence processes

Internal Policies

The company requires all employees to acknowledge specific company policies as a part of beginning their employment tenure (See Appendix B). Policies include but are not limited to:

- **Social Responsibility** – *As our sales have extended into more than twenty countries across five continents, so too has our promise to create socially responsible societies. Whether it is the management of each of our operations, or selection of suppliers, or strategic customer partnerships, Precision Concepts is committed to leveraging our reach to move our global society in a more positive and sustainable path forward.*
- **Employment Eligibility and Work Authorization** – *Acknowledging individuals who are authorized to work and comply with applicable employment laws*
- **Hiring Practices** – *To make all managers and supervisors aware of the Company’s hiring practices*
- **Voluntary Open Door Policy** – *Ensuring employees feel free to raise concerns, complaints, questions to a supervisor or confidentially to a Human Resource representative*
- **Code of Business Conduct and Ethics** – *A commitment to a culture of honesty, integrity, and accountability, outlining basic policies and principles with which all directors, officers, and employees of the Company, and all subsidiaries, are expected to comply.*

Furthermore, the Company posts an ethical and compliance hotline in its employee portal that addresses employee, customer, and vendor awareness, and encourages reporting of unethical, unsafe, or illegal activity.

External Policies

The Company, and all subsidiaries, operate with the highest ethical standards, withholding all external stakeholders in the supply chain to do the same. Each supplier is required to attest to a “Supplier Code of Conduct”, unless otherwise noted and documented by their own operating code of conduct. See Appendix A and Appendix C for further information.

Requirement (c) – Forced labor and child labor risks

The Company, and all subsidiaries, are exposed to inherent risks throughout the internal operational structure, as well as with external parties. Both internally and externally, individuals are determined to attest to and declare truthful, legal, documented information. However, if an individual or entity chooses to represent false information or provide false documentation, exposure to behavior not in accordance with the stated policies and processes is possible. Additionally, if multiple individuals collude to avoid a control process there could be exposure to risk. Finally, there is a risk in the possibility that an internal employee or external party could utilize an unaffiliated resource that is unbeknownst to the Company. Internally the risk for an unaffiliated resource is very low, given that all primary direct and indirect labor tasks are performed on-site at an operating location.

Requirement (d) – Remediation measures

As it pertains to reporting year 2023, the Company and all subsidiaries have determined remediation for, or remedy of, forced labor or child labor is considered not applicable.

Requirement (e) – Remediation of loss of income

As it pertains to reporting year 2023, the Company and all subsidiaries have determined remediation of loss of income is considered not applicable.

Requirement (f) – Training

As part of the onboarding process, the Company requires Anti-Harassment and Code of Conduct policies to be acknowledged, wherein appropriate conduct stipulations are defined.

Furthermore, the Company assigns periodic training videos through an external provider, to various levels of management and employment, which discuss awareness of workplace violence and harassment.

As of 2023 the Company does not provide any training or awareness materials to partners or suppliers.

Requirement (g) – Assessing effectiveness

The Company and all subsidiaries routinely audit onboarding policy acknowledgment and training video participation through third party providers. If employees are not in compliance they are notified. If corrective action is not addressed accordingly escalated measures are applied. Not acknowledging all required onboarding policies can result in suspension or termination of employment. Nonparticipation of required training videos can impact certain forms of compensation.

Additionally, operating subsidiaries are required to have weekly safety meetings in which they address all safety or non-compliance issues. Employees are tasked with identifying risks and appropriately communicating it throughout the organization. Directors and Officers of the Company are updated weekly as part of a management update, as well as monthly during operational reviews.

Presently no actions have been taken to assess the effectiveness in preventing and reducing risks of forced labor and child labor in the external supply chain.

Appendix A

**Precision Concepts Parent Inc ("PC")
 Major Supplier Code of Conduct Acknowledgment
 Reporting Year 2023**

Supplier name:	Material sourced:	Sourced from:	Delivered to:	Signed PC Supplier Code of Conduct	Provided Own Code of Conduct
Invista	Resin	USA	USA, Canada		x
DAK	Resin	Canada	USA, Canada	x	
APG/FENC	Resin	USA, Canada	USA, Costa Rica	x	
Pavago	Resin	USA, Taiwan	USA, Canada, Costa Rica	x	
M.Holland	Resin	USA	USA	x	
Tricon	Resin	Central America	Costa Rica	x	
Quimtec	Resin	Central America	Costa Rica	x	
Caribbean Plastic	Resin	Central America	Costa Rica	x	
Indorama	Resin	Central America	Costa Rica	x	
Primex	Colorant	USA	USA	x	
Avient	Colorant	USA	USA, Canada, Costa Rica		x
Coansa	Colorant	Central America	Costa Rica	x	
Colorco	Colorant	Central America	Costa Rica	x	
National Plastic Color	Colorant	Central America	Costa Rica	x	
PCA	Corrugate	USA	USA	x	
Cascades	Corrugate	Canada	Canada		
Atlantic Packaging	Corrugate	Canada	Canada	x	
Corrugados	Corrugate	Central America	Costa Rica	x	
Morissette	Secondary Packaging	USA	USA	x	
Millwood	Secondary Packaging	USA	USA	x	

Appendix B

US Handbook Employee Policies (represented as “corporate” handbook)

Social Policy (excerpt)

Precision Concepts believes being socially responsible requires constant focus on improving the lives of our employees, their families, and ultimately their communities. We do this through:

- Creating a work environment that integrates safety and wellness programs.
- Encompassing occupational health and safety, health education, employee assistance, and disability management.
- Supporting employees and facilities to participate in civic activities geared at giving back and paying forward to the surrounding communities in which they live and breathe.
- Demanding a zero-tolerance policy for work place discrimination and harassment from its employees, suppliers, and customers where employees are encouraged to communicate openly and freely with management.

Our belief is that Precision Concepts can and should have a positive impact on the communities we serve: one person, package, and plant at a time.

Employment Eligibility and Work Authorization

Precision Concepts International LLC is committed to employing only individuals who are authorized to work in the United States and who comply with applicable immigration and employment law. As a condition of employment, every individual must provide satisfactory evidence of his or her identity and legal authority to work in the United States within three business days of commencing employment. If the employee cannot verify his or her right to work in the United States within three business days of employment, the Company will be required to terminate his or her employment immediately.

Hiring Practices

All managers and supervisors should be aware of Precision Concepts’s hiring practices which can be found under “policies” on the employee portal: <https://ew13.ultipro.com/login.aspx>. If you have any questions, please contact Human Resources.

Voluntary Open Door Policy

We recognize that employees may have suggestions for improving our workplace, as well as complaints about the workplace. We feel that the most satisfactory solution to a job-related problem or concern is usually reached through a prompt discussion with an employee's supervisor. Employees should feel free to contact their supervisor with any suggestions and/or complaints. If employees do not feel comfortable contacting their supervisor or are not satisfied with their supervisor's response, they should contact Human Resources.

While we provide employees with this opportunity to communicate their views, please understand that not every complaint can be resolved to the employee's satisfaction. Even so, we believe that open communication is essential to a successful work environment and all employees should feel free to raise issues of concern without fear of reprisal.

Appendix B (continued)**Code of Business Conduct and Ethics**

We require high standards of professional and ethical conduct from all our employees. This Code of Business Conduct and Ethics (the “Code”) reflects our commitment to a culture of honesty, integrity and accountability and outlines the basic principles and policies with which all directors, officers and employees of Precision Concepts International LLC and the entities controlled by it are expected to comply. In this Code, Precision Concepts International LLC and the entities controlled by it are referred to as “Precision Concepts International” or the “Company” and the directors, officers and employees of such entities are collectively referred to as “employees”.

This Code is designed to assist those individuals to whom it applies in understanding their legal and ethical obligations and to encourage:

- Avoidance of conflicts of interest.
- The integrity of Precision Concepts International’ financial records and public disclosure documents.
- Protection of Precision Concepts International’ assets, including its confidential information.
- Compliance with applicable laws.
- Fair and ethical conduct in Precision Concepts International’ business dealings.
- Accountability for compliance.

This Code is not exhaustive, and no statement of principles and procedures can offer a complete guide to cover all possible situations. Precision Concepts International LLC employees are expected to observe both the spirit and the letter of this Code and to consult this Code or an appropriate representative of Precision Concepts International LLC when faced with an ethical issue.

Appendix C

Supplier Code of Conduct (excerpt)

Create a Diverse, Fair, and Inclusive Workplace

Fair Treatment and Ethical Working Environments

Suppliers must comply with all applicable local wage and labor laws. Employee working hours will not exceed the maximum allowable as permitted by local legislation, and employees will be fairly compensated for any overtime hours worked. Employees will be treated with dignity and will not be subject to any form of harassment, abuse, or threats of such treatment.

Freedom of Association and Non-Retaliation

Suppliers shall allow employees, as outlined by local law, to associate freely, join or unjoin labor unions, and seek representation. Workers will be permitted to speak freely about working conditions, safety concerns, wages, and benefits without fear or threat of retaliation.

Child and Forced Labor

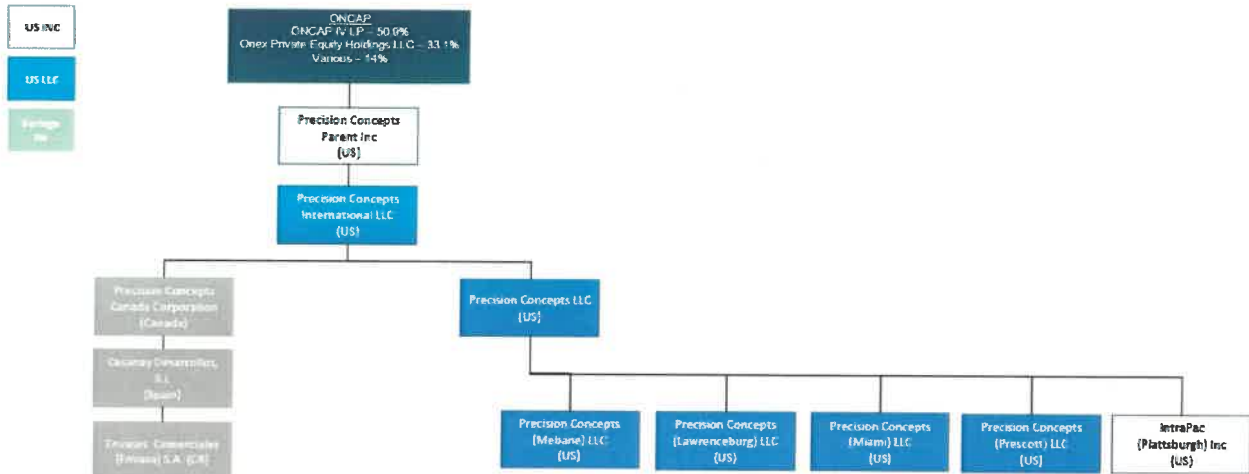
Precision Concepts suppliers must not use or benefit from any form of forced labor including human trafficking, bonded, indentured, or involuntary prison labor. Furthermore, Precision Concepts will not tolerate any use of child labor. Suppliers must comply with all applicable labor restriction laws and regulations.

Diversity and Inclusion

Suppliers must comply with all applicable non-discrimination laws and regulations ensuring fair hiring and employment practices. Precision Concepts commits to creating and promoting work environments free from any form of discrimination or inequality. Suppliers will create workplaces free of discrimination, harassment, and retaliation on any grounds, including but not limited to age, disability, ethnic origin, sexual orientation, marital status, political or religious beliefs. Suppliers will commit to fair treatment and equal employment opportunities, recruitment efforts, training, professional development, and remediation for all employees. Precision Concepts expects suppliers to create supportive environments and exercise diversity within their organization and business practices. These practices should extend to every level of the organization. Precision Concepts looks forward to partnering with suppliers who share our values and expanding our diverse workforce.

Appendix D

Precision Concepts Legal Entity Organization Chart
as of Dec 31, 2023



Precision Concepts Parent, Inc.

Including subsidiaries:

*Precision Concepts International LLC
Precision Concepts LLC
Precision Concepts (Lawrenceburg) LLC
Precision Concepts (Mebane) LLC
Precision Concepts (Prescott) LLC
Precision Concepts (Miami) LLC
IntraPac (Plattsburgh) Inc
Precision Concepts Canada Corporation
Casanay Desarrollos, S.L.
Envases Comerciales S.A.*

Reporting Year 2023

Canada Modern Slavery Act – Director Attestation

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 Ray Grupinski

Title Chief Executive Officer, President, Director

Date May 31st, 2024

I have the authority to bind Precision Concepts Parent Inc.

Signature 