



2024 Supply Chain Act Annual Report

This document constitutes the Annual Report (the “Report”) pursuant to Section 11 of the Fighting Against Forced Labour and Child Labour Supply Chain Act (the “Supply Chain Act” or the “Act”) and is filed on behalf of the following entity:

HarbisonWalker International Corp.

(referred to hereafter as the “Reporting Entity” and “we”, “us” and “our”).

The Reporting Entity’s Financial Year follows the calendar year. This Report therefore covers the Reporting Entity’s activities for the period January 1, 2024, to December 31, 2024.

HWI is one of the leading suppliers of refractory products and services in North America, with a history that spans more than 150 years. It is part of Caldersys and is the brand for the Americas region of the Group. Serving virtually every major industry that requires refractory solutions to enhance production and protect assets, HWI is consistently recognized for its talented experts, industry firsts, and intensely driven excellence.

The following sets out the steps we have taken to prevent and reduce the risk of forced labour and child labour in our supply chains.

Structure, activities and supply chains

The Reportable Entity is a corporation incorporated under the laws of the Province of Ontario. Its registered office is located at 2689 Industrial Park Road, Smithville, ON L0R 2AD. Its business registration number is 450483-6.

We do not own any subsidiary companies.

We currently employ 61 people in Canada. We are a wholly owned subsidiary of our US parent, HarbisonWalker International Holdings Inc. Starting from 16 February 2023, both companies became part of the Caldersys Group of companies, the holding company of which is incorporated under the laws of England and Wales, (the “Calderys Group”).

We have two manufacturing facilities, and one distribution centre, all located within Ontario. Our Smithville Ontario facility is a producer of high purity alumina/ basic MGO castable, well fill sands and precast shapes, Acton facility produces fireclay crucibles and clay based insulating brick.

Our distribution centre is also located within our Smithville facility and supplies the Canadian market with refractories from our sister plants. Our raw materials are supplied by various companies from the United States, Germany, France, China and South Africa.

A total of 15,272 metric tons of raw materials were imported into Canada via the US border in 2024. The raw materials imported were alumina; binder (cement and silicate); chromic (chromic oxide and chromic ore-foundry); insulating materials; magnesia and other chemicals; poly fibers, spinel and zircon.

In addition, we import finished goods from our US parent and our Mexican sister company. Canada and the United States are our largest markets, though we also export globally.

Policies and due diligence processes

As part of the Caldersys Group, we apply its policies and due diligence procedures.

The Caldersys Group is committed to protecting the health and safety of our employees, customers, suppliers, contractors, visitors and others affected by our operations. We do not condone forced



labour and child labour, and we comply with the Calderys Group Code of Business Conduct and Ethics, (the “Code”). Through the Code we are committed to meeting our obligations regarding, amongst other things, human rights and the identification and eradication of forced and child labour in our supply chains. The Code is based on internationally recognized best practices. Accordingly, the Calderys Group commits itself to complying with the following:

- The 1948 Universal Declaration of Human Rights;
- The United Nations Guiding Principles on Business and Human Rights;
- The OECD’s Guidelines for Multinational Enterprises; and
- The International Labour Organization’s Fundamental Conventions

Additionally, although the Calderys Group does not fall within the ambit of the United Kingdom’s Modern Slavery Act 2015, the Group has published a Human Rights Statement which is available to view on the Group’s website.

More specifically, we apply the Calderys Group Purchasing Policy (the “Policy”). The Purchasing Department is responsible for ensuring the efficient operation of our supply chains.

The Policy requires all members of the Purchasing Department to be knowledgeable about the Code as well as associated policies, procedures and protocols and to apply supplier ESG standards when evaluating the suitability of a supplier.

To progress successfully in its efforts towards greater resource efficiency and circular economy, Calderys needs to ensure its suppliers meet the required ESG standards, including those relating to forced and child labour, and are aligned in their efforts for more responsible resource consumption and management. Calderys’s vision for sustainable procurement is to cultivate a robust, responsible and resilient supply chain ecosystem, forging partnerships with suppliers who share its commitment to delivering consistent, high-quality products and services. By integrating sustainable practices across its supply chain, Calderys strives to create sustainable growth for all its stakeholders.

Before goods or services are purchased, the Purchasing Team requires vendors to sign the Supplier ESG Standards document, committing to and aligning with the specified principles. This is part of the vendor onboarding process. For high spend critical suppliers, we use The Ecovadis programme for ESG assessment.

Suppliers must be able to demonstrate that they can meet the Calderys’ minimum ESG criteria and where any gaps identified by Calderys, through formal or informal assessments, suppliers must be willing to develop a corrective action plan within an agreed timeframe. We will verify alignment with ESG standards through the use of supplier self-declaration, self-assessments, assessments by Calderys Group teams, and in designated high-risk third-party audits.

Risks of forced labour and child labour in our operations and supply chains.

Although we are not aware of any use of forced or child labour in our supply chains, the procedures set out in the Group’s Purchasing Policy take such risks into account during the supplier approval process. That said, we are aware that risks exist, regarding our imports from China. The Calderys



Group and our US parent are particularly sensitive to the requirements of the United States' Uyghur Forced Labor Prevention Act 2021 (the "UFLP Act").

A review at Group level of the Calderys Group's Chinese suppliers, including those used by us, did not identify any suppliers based in the Xinjiang Uyghur Autonomous Region of the People's Republic of China. Furthermore, as noted above, imports of raw materials from China enter Canada via the United States and there has been no enforcement by the US Customs and Border Force under the UFLP Act in respect of such imports.

Our remediation processes

Should a member of the Purchasing Team have a reasonable suspicion that a supplier is directly committing a serious violation of the supplier ESG Standards or is sourcing from any party committing a breach of these ESG Standards, the Purchasing Team must report this to the Legal Department, the Group's Ethics & Compliance Committee or Group Purchasing VP. Where appropriate the relationship with the supplier will be suspended or terminated.

We encourage our employees to remain vigilant to potential forced labour and child labour and escalate any concerns to management or through the independent 'Speak Up' helpline, where reports are reviewed and investigated. Staff who report such concerns are protected from retaliation. The helpline is also available to our external stakeholders.

Remedial action taken during 2024

Roll out and strict application by us of the Calderys Purchasing Policy described above which was enhanced with roll out of the Ecovadis ESG tool. We are not aware of any vulnerable families having suffered a loss of income as a result of our activities, therefore no measures in this area needed to be taken in 2024.

Our training

The Group provides general training on business ethics and compliance, including training on our Code of Business Conduct and Ethics which, as noted above, encompasses the Group's aim to eradicate the use of forced and child labour. This training has been developed in-house and takes the form of classroom training lasting approximately half a day. The training is compulsory and must be attended by all exposed staff, including middle and top managers.

Assessing our effectiveness

We are not currently taking any action to assess our effectiveness in preventing and reducing the risks of forced labour and child labour in our activities and supply chains. However, going forward we expect that the Group's Internal Audit Department will undertake a review of the effectiveness of our supplier approval process in the fullness of time.

Approval

This Annual Report was approved by the Board of Directors of the Reporting Entity on May 19, 2025.



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 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 year listed above.

Dated this 19th day of May, 2025

HarbisonWalker International Corp.

Full name: Ross C. Wilkin Director, I have authority to bind HarbisonWalker International Corp.

Signature Ross C. Wilkin
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Full name: John Oliveira Director, I have authority to bind HarbisonWalker International Corp.

Signature John Oliveira
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