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## **Bill S-211 Report – Sodrox Chemicals Ltd.**

### **Reporting Period: May 1, 2024 to April 30, 2025**

#### **1.0 Introduction**

This report has been prepared in accordance with the requirements of Bill S-211: *Fighting Against Forced Labour and Child Labour In Supply Chains Act*, referred within this report as “the Act”. The Act was created to protect human rights within global supply chains and to fight against modern forms of slavery that exist around the world, including child labour and forced labour.

Sodrox Chemicals Ltd. (“Sodrox”) may be considered a reporting entity based on certain criteria noted within the Act pertaining to size and scope of operations. As such, Sodrox has taken the appropriate steps to evaluate risk related to forced labour and child labour within its supply chain, and to complete and file an annual report in compliance with the Act.

#### **2.0 Description of Organization and Activities**

Sodrox is a privately-owned, full-service chemical distributor founded in 1984, with its head office in Guelph, Ontario. Sodrox specializes in the supply, transportation, and storage of industrial corrosives, providing vital products to a variety of sectors, including but not limited to the following: municipal and industrial water treatment, food and beverage processing and production, manufacturing, agriculture, and metal finishing. Sodrox is primarily a bulk chemical distributor, while also operating a division that focuses on specialty blends and packaging. Operating out of its facilities in Ontario and Quebec, Sodrox sells its products exclusively within Canada and the United States. Sodrox manages and controls all its own purchases in house through its own procurement team.

Sodrox is a member of Responsible Distribution Canada (RDC), which has developed an industry leading Code of Practice for chemical distributors. As a Responsible Distribution member, Sodrox is subject to rigorous third-party verifications to ensure ongoing compliance and commitment to best practices, including ethical supply chain management and labour practices.

### **3.0 Risk Assessment**

When assessing risk, Sodrox notes that it operates within the context of a supply chain with low complexity. Most products distributed by Sodrox are sourced through a relatively small number of Canadian and American vendors, all of whom are very well known in the industry and have had long relationships with Sodrox. Given the labour standards in Canada and the United States, the level of risk pertaining to forced labour and child labour within the supply chain is perceived as low.

Currently, Sodrox is not aware of any instances of forced labour or child labour within its supply chain. Sodrox will evaluate its supply chain for these risk factors on an ongoing basis for the purposes of social responsibility and for compliance with the Act.

### **4.0 Practices and Due Diligence**

As an employer, Sodrox complies with all applicable employment legislation in the regions in which it operates. Sodrox has adopted many best practices that exceed employment standards.

When examining its supply chain, Sodrox considers employment laws and practices in the countries where its suppliers are located. In instances where additives or other raw materials are sourced from parts of the world where labour protections may not be as robust, Sodrox has committed to evaluating its suppliers' labour practices through surveys and other forms of engagement.

Sodrox personnel are required to complete annual supplier evaluations, which provide an opportunity to review legal compliance, including labour practices. The supplier evaluation form has been modified to include a section specifically pertaining to Bill S-211 compliance.

Prospective business partners (including customers and suppliers) are subject to screening as part of the onboarding process. If there is perceived risk, then there will be further inquiries around ethics and compliance regarding labour practices of concern, such as those addressed within the Act.

All Sodrox employees sign a company code of conduct outlining the expectations of ethical behaviour within the workplace, including labour practices.

## 5.0 Training

Sodrox employees are trained in the requirements of Responsible Distribution and its corresponding Code of Practice. At this time, there is no dedicated training provided to employees relating to Bill S-211, but Sodrox will commit to providing specific training in the future if deemed necessary.

## 6.0 Conclusion

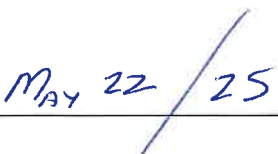
Sodrox recognizes the importance of Bill S-211 and the importance of fighting against modern forms of slavery in its various forms. Given the evolving and dynamic nature of the global trade landscape, Sodrox will continue to monitor its practices and their ongoing effectiveness. Sodrox commits to engaging further with its industry partners in identifying risks in the supply chain, through RDC committee meetings and beyond.

## 7.0 Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Act)*, and in particular section 11 thereof, I, in the capacity of President, attest that I have reviewed the information contained in the report on behalf of Sodrox Chemicals Ltd. 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 within this report.

**Bart Jarvis, President**  
**Sodrox Chemicals Ltd.**

  
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Signature  
I have the authority to bind Sodrox Chemicals Ltd.

  
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Date