

Forced Labour and Child Labour in Supply Chains Statement

Addressing the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2023.

About this Statement

This is a statement of the steps Cooley Group Holdings, Inc and its Canadian subsidiary, Cooley Inc, have taken in an effort to ensure slavery and human trafficking are not taking place in our supply chain or business for fiscal year 2024, the period of 12 months ending on September 30, 2024. The following document serves as a statement complying with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. In this document, we refer to both entities collectively as “Cooley”. Cooley Group Holdings and Cooley, Inc. are reporting entities for the purposes of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Our Company, Structure, and Supply Chain

Cooley Group Holdings is a global manufacturers of polymer technology and technical textiles. Headquartered in Pawtucket, Rhode Island, USA. Our products are manufactured in Canada and the United States. On September 30, 2024 we had 3 facilities; 2 in the USA and 1 in Canada. We market and distribute our products in over 50 countries on 6 continents.

Our Supply Chain

Although our supplier base is global, the majority of our suppliers are based in North America. The principal raw materials we use are PVC Resin, polyester yarns and fabric. Most of these inputs for our Canadian operations are purchased from suppliers in the United States and Canada.

Our Approach to Human Rights

Cooley is committed to respecting human rights and strives to positively impact all the people we depend upon across our full value chain. We aim to know our human rights risks and take them into account in business decisions.

Commitments, Policies, and Training

Respect for human rights is fundamental to our commitment to ethical business conduct.

We respect and acknowledge internationally recognized human rights principles. We recognize governments are ultimately responsible for establishing the legal framework to protect human rights within their jurisdictions.

As part of our commitment to employee success we:

- Prohibit forced labour, child labour, and discrimination
- Work to establish safe and healthy working conditions, including freedom of movement
- Value diversity and consider it complementary to our business strategy
- Seek to compensate employees competitively and operate in compliance with applicable wage, work hours, overtime, and benefits laws

Employee Training and Communication

We communicate our expectations through our collaborative health and safety employee onboarding experience.

Human Rights Due Diligence in our Own Operations

There is no risk of modern slavery in our owned operations due to our hiring policies and coherence with local employment legislation.

Employee Concerns

Cooley employees are encouraged to raise concerns with their manager, and they are also reminded our Human Resources department and employer-paid Employee Assistance Program are available for receiving concerns. Safety and employee wellbeing concerns can be addressed through our STOP card program.

Risks Included in our Supply Chain

Some raw materials have a higher likelihood of modern slavery risks due to conditions in the countries in which they are grown and/or the typical practices associated with their production. Cooley is conscious of this – and research continues to address the risks that may be present in our supply chain.

Most of our suppliers are based in North America, and due to location are classified as low risk although not immune. All suppliers are included in a review of our supplier codes of conduct and policies regarding modern slavery.

Looking Ahead

Our journey to advance human rights is one of continuous improvement. As we progress, we plan to expand our measures. Our focus in the coming year includes:

- Continue building due diligence capabilities to identify risks where impacts on people are most severe across our supply chain
- Increasing employee awareness of our human rights strategy
- Integrating expectations into standard business processes

I have the authority to bind 'Cooley, Inc.'

Hereby signed,



Ronald Markovsky

Executive Vice President, CFO, Director

Cooley, Inc.

Cooley Group Holdings, Inc.