



**REPORT ON MODERN SLAVERY  
FOR THE FINANCIAL YEAR ENDED DECEMBER 31, 2025**

**May 4, 2026**

**3365 Mainway  
Burlington, Ontario  
L7M 1A6**

## 1. Introduction

This report (the “Report”) has been prepared by EcoSynthetix Inc. (the “Company”) and its subsidiaries (collectively, “EcoSynthetix”) pursuant to the requirements of Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”).

This Report describes the measures taken by EcoSynthetix during the financial year ended December 31, 2025 (the “Reporting Period”) to prevent and reduce the risk that forced labour or child labour is used at any stage of the production of goods in Canada or elsewhere, or of goods imported into Canada by EcoSynthetix.

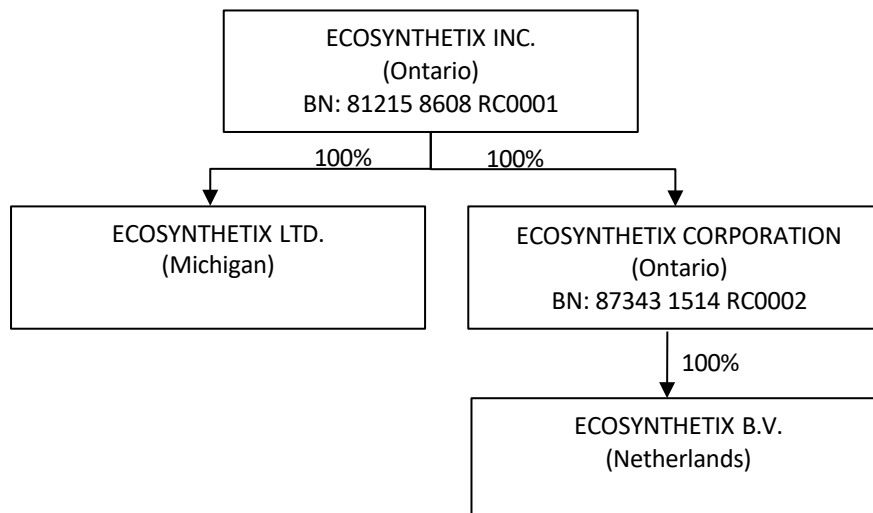
EcoSynthetix is committed to conducting its business in a lawful and ethical manner and to respecting internationally recognized human rights. EcoSynthetix does not knowingly engage in or support the use of forced labour, child labour, or human trafficking in its operations or supply chains.

## 2. Structure, Operations and Supply Chains

### Structure

The Company was incorporated under the Business Corporations Act (Ontario) on May 20, 2011. Its registered head office is located at 3365 Mainway, Burlington, Ontario, Canada. The Company’s common shares trade on the Toronto Stock Exchange under the symbol “ECO”.

The Company operates through several wholly owned subsidiaries in Canada, the United States, and the Netherlands (collectively, the “Subsidiaries”). The following chart sets out the Company’s principal subsidiaries, including the governing law of each entity and the percentage of voting securities beneficially owned, or over which control or direction is exercised, by the Company as of the date of this Report.



## **Operations**

EcoSynthetix is a renewable chemicals company that develops and supplies bio-based materials used in industrial and consumer applications. Its products include DURABIND®, ECOSPHERE® BIOLATEX®, SURFLOCK™, and BIOFORM™ biopolymers which are used to manufacture wood composites, paper, pulp, paperboard, tissue, and personal care products.

EcoSynthetix employs 29 employees, primarily located in Burlington, Ontario, where it operates research, development, and production activities.

## **Supply Chains**

EcoSynthetix's supply chain includes the procurement of raw materials, process chemicals, and third-party manufacturing services.

The primary inputs used in the production of EcoSynthetix's products include:

- starch (primarily corn starch);
- process chemicals; and
- toll manufacturing services.

Starch and process chemicals are sourced primarily from suppliers located in the United States and the European Union.

EcoSynthetix manufactures products in Canada and through a third-party toll manufacturer located in the Netherlands. In the Netherlands, EcoSynthetix provides raw materials to the third-party manufacturer, which processes those materials into finished goods using its own facilities and workforce. EcoSynthetix does not employ personnel at this location.

## **3. Risks of Forced Labour or Child Labour**

EcoSynthetix has undertaken a risk assessment to identify potential exposure to forced labour or child labour in its operations and supply chains.

This assessment considered:

- the nature of the goods, services, and processes involved;
- supplier characteristics and publicly available information;
- the geographic location of suppliers; and
- EcoSynthetix's business relationships with suppliers and manufacturing partners.

Based on this assessment, EcoSynthetix has not identified any specific instances of forced labour or child labour in its operations or direct supply chains during the Reporting Period.

EcoSynthetix considers the risk of forced labour or child labour in its direct operations to be low. The Company notes that:

- its manufacturing processes are capital-intensive and require specialized equipment and technical expertise;
- a significant portion of its suppliers are large, established entities; and

- the majority of its suppliers are located in jurisdictions with established regulatory frameworks addressing labour standards.

EcoSynthetix recognizes that risks may exist in indirect or upstream supply chains that are not fully visible to the Company and will continue to assess such risks.

EcoSynthetix’s risk assessment is based on information reasonably available to the Company during the Reporting Period, including information provided by suppliers and publicly available sources. The Company’s visibility into its supply chains may be limited, particularly beyond its direct suppliers, and EcoSynthetix does not independently verify all supplier-provided information.

#### **4. Measures Taken to Prevent and Reduce Risk**

During the Reporting Period, EcoSynthetix maintained the following measures to prevent and reduce the risk of forced labour and child labour in its business and supply chains:

- **Policy framework:**  
Adoption of a Child Labour and Human Trafficking Policy in December 2024, applicable to all employees, which outlines the Company’s expectations regarding the prohibition of forced labour, child labour, and human trafficking, as well as related compliance and monitoring requirements.
- **Supplier onboarding and approval:**  
Procedures to assess and approve new suppliers, including the maintenance of an approved supplier list.
- **Supplier due diligence and review:**  
Periodic review of key suppliers, including consideration of applicable laws, geographic risk factors, and publicly available information relating to labour practices.
- **Risk-based supplier certifications:**  
Where appropriate, the Company may request confirmations from suppliers regarding compliance with applicable laws and the absence of forced labour and child labour.
- **Supplier engagement:**  
Ongoing communication with key suppliers regarding business practices and expectations.
- **Corporate governance and internal policies:**  
Maintenance of policies applicable to employees, including the Child Labour and Human Trafficking Policy, Code of Business Conduct and Ethics, and Whistleblower Policy.

#### **5. Policies and Due Diligence Processes**

##### **Policies**

EcoSynthetix maintains the following policies relevant to forced labour and child labour risk management:

- Child Labour and Human Trafficking Policy;
- Supplier Code of Conduct;
- Code of Business Conduct and Ethics;
- Environmental, Social and Governance Policy; and
- Whistleblower Policy.

The Child Labour and Human Trafficking Policy support the Company's approach to identifying, preventing, and addressing risks related to forced labour and child labour within its operations and supply chains. The Supplier Code of Conduct sets out the Company's expectations that suppliers do not engage in forced labour, child labour, or human trafficking, consistent with internationally recognized standards. The Supplier Code of Conduct applies to suppliers; however, it is not currently incorporated as a contractual requirement in all supplier agreements and may be incorporated into such agreements over time.

## **Due Diligence Processes**

EcoSynthetix's due diligence processes include:

- assessment of new suppliers prior to engagement;
- maintenance of an approved Supplier List;
- periodic review of existing suppliers; and
- ongoing engagement with key suppliers.

EcoSynthetix also maintains a business relationship with a third-party manufacturing partner and conducts periodic visits and interactions in connection with operational and customer-related requirements.

## **6. Remediation Measures**

EcoSynthetix did not identify any instances of forced labour or child labour during the Reporting Period. Accordingly:

- no remediation measures were required; and
- no measures were taken to remediate any loss of income to vulnerable families.

The Company has not established a formal remediation process specific to forced labour or child labour and continues to assess its approach in this area.

## **7. Training**

EcoSynthetix has not implemented formal training programs specifically addressing forced labour or child labour. However, employees are required to review and acknowledge compliance with the Code of Business Conduct and Ethics and the Child Labour and Human Trafficking Policy on an annual basis.

EcoSynthetix will evaluate the development of formal training programs as part of its ongoing efforts to strengthen its approach to identifying and addressing risks related to forced labour and child labour.

## **8. Assessing Effectiveness**

EcoSynthetix assesses the effectiveness of its policies and procedures through internal review processes and continuous improvement activities, including those associated with its ISO 9001 certification.

The Company has not established formal, dedicated performance indicators or metrics specifically designed to measure the effectiveness of its actions in preventing forced labour or child labour and continues to assess its approach in this area.

EcoSynthetix is committed to continuously improving its policies, procedures, and oversight mechanisms to address risks related to forced labour and child labour. The Company will build on its existing framework through enhanced training and supplier engagement.

## **9. Approval and Attestation**

This Report was approved by the Board of Directors of EcoSynthetix Inc. pursuant to subsection 11(4) of the Act.

In accordance with the requirements of the Act, I attest that I have reviewed the information contained in this Report. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the Reporting Period.

I have the authority to bind EcoSynthetix Inc.

Jeff MacDonald



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Chief Executive Officer and Board Member

Date: May 4, 2026