



Montebello Packaging

Modern Slavery Act Report 2025

This Modern Slavery Act Report (the “**Report**”) addresses the period from January 1, 2025 to December 31, 2025 and has been prepared in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) (the “**Act**”).

This Report is made on behalf of **Montebello Packaging Inc., a division of Great Pacific Enterprises Limited Partnership (“MONTEBELLO”)** and is not a joint report.

I. INTRODUCTION

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. As a leading business in the manufacturing of collapsible aluminum tubes, laminate tubes and small aerosol cans, MONTEBELLO recognizes the important role that it plays in ensuring that the supply chains that support its operations and products adhere to the highest ethical standards, including the prevention and identification of forced labour and child labour. This Report sets out the steps MONTEBELLO has taken during the 2025 fiscal year to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by MONTEBELLO or of goods imported into Canada by MONTEBELLO.

II. CORPORATE OVERVIEW AND SUPPLY CHAINS

Established in 1952 in Montebello, Quebec, MONTEBELLO moved to 1036 Aberdeen Street, Hawkesbury, Ontario in 1959, which location remains the head office to this date. MONTEBELLO was eventually acquired by Jim Pattison in 1989.

MONTEBELLO has grown into a well-known North American packaging company serving Pharmaceutical, Personal Care, Cosmetic and Industrial markets with high quality aluminum tubes and aerosol cans as well as laminate tubes. MONTEBELLO has a manufacturing plant in each of Hawkesbury, Ontario and Montreal, Quebec as well as two additional plants in the United States. MONTEBELLO manufactures a limited number of products that can be found in any typical pharmacy, grocery or hardware store as a primary package for multiple well-known brands.

MONTEBELLO has always sourced its raw materials from reputable industry leaders. Raw materials are usually sourced from Canadian and US suppliers when available. However, industry specific aluminum slugs and laminate films do not have their origins in North America. As always, we expect that our suppliers and partners will act with integrity and comply with all local laws and international agreements at every step of the supply chain. The fact that issues such as forced labour and child labour exist and may be part of the production of goods that make their way to Canadians means that we, like every company in Canada, must move beyond these assumptions.

MONTEBELLO has over 400 suppliers. In 2025, the top 10 suppliers represent 81% of all raw material purchases.

As a manufacturer, MONTEBELLO orders raw materials and uses complex operations to transform them into primary packaging solutions for its customers. The materials needed to manufacture our products that are currently not available in Canada or the US and therefore sourced internationally are:

- Aluminum slugs
- Laminate film
- Manufacturing equipment

III. POLICIES AND DUE DILIGENCE PROCESSES

Policies

MONTEBELLO has policies in place that address sustainability, human rights, labour rights and environmental concerns when dealing with its suppliers.

- Sustainable Procurement Policy
 - o Created to address risks related to responsible sourcing materials, including with respect to human and labour rights, environmental impacts and transparency.
- Quality Agreement for Materials Supply
 - o Includes a Code of Conduct in section 2 and covers Labour, Health and Safety, Environment and Ethics.
 - o This agreement is reviewed every three (3) years.
- Supplier Management SOP
- Whistle Blower Policy

Although MONTEBELLO sources certain raw materials internationally, it only does so directly via a select few suppliers, reducing the risk of child labour or forced labour from an indirect source. Additionally, from the list of international suppliers, only two are outside of the European Union - one in Thailand and one in China. Nonetheless, MONTEBELLO has a Quality Agreement in place with most major raw material suppliers including the two in Asia.

Further, MONTEBELLO has been working with the Ecovadis framework and continues to work on improving its score. EcoVadis is a globally recognized assessment platform that rates businesses' sustainability based on four key categories: environmental impact, labour and human rights standards, ethics and procurement practices.

Due Diligence

Based on the Supplier Management SOP and Quality Agreement,

- MONTEBELLO uses different audit levels periodically with suppliers;
- MONTEBELLO requests proof of license, qualifications and/or compliance from suppliers; and
- MONTEBELLO reviews and updates Quality Agreements every three (3) years.

With clear and timely communication with suppliers, MONTEBELLO can review performance and adherence to codes of conduct and evaluate different risks including compliance to labour and human rights.

IV. RISK ASSESSMENT AND MANAGEMENT

We understand that the metal production supply chains can have instances of forced labour or child labour and different regions, like Thailand and China, can have a higher likelihood of this risk in its supply chain. Most of this risk lies at the commodity production level. MONTEBELLO has dual source for most of its materials including aluminum and laminate films.

V. MODERN SLAVERY REMEDIATION MEASURES

To date, MONTEBELLO has not identified any suspected instances of forced or child labour associated with any of the materials it purchases. If through our risk assessment and vendor inquiry we find any unethical business practices or use of forced or child labour, we insist the entity take all reasonable action to address or remove these practices, including where relevant addressing any practices of other entities in its supply chains. If they are unable to remediate the practices, we make a business decision on the continuation of the relationship.

VI. LOSS OF INCOME – REMEDIATION MEASURES

As of the writing of this Report we have no knowledge of forced or child labour being used in our supply chain, but we are committed to the addition of processes to help identify these instances and support the development of an appropriate remediation approach. As a result, there are currently no measures in place to remediate any loss of income to families resulting from measures taken to eliminate the use of forced or child labour in our supply chain.

VII. TRAINING

In 2025, we did not have specific, formalized training in place to understand and mitigate the risk of forced labour or child labour. With limited exposure to international supply chains and low risk of forced labour or child labour, we are reviewing how to improve procurement decisions and avoid any potential human rights violations in the supply chain.

VIII. ASSESSING EFFECTIVENESS

Due to the complex nature of the base metals and resin supply chain, comprehensive traceability solutions and/or standards will ultimately be key for not only our business but also any that rely on a complex and far-reaching upstream supply chain. The current traceability and certification solutions range significantly, and we are actively participating in the industry-driven development of solutions, as well as looking to our associations and various resources to help inform best practices and policies going forward.

IX. APPROVAL AND ATTESTATION

This Report was approved pursuant to section 4(a) of the Act and has been submitted to Public Safety Canada. This Report is also available on our company website at www.montebellopkg.com.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in the capacity of President of MONTEBELLO, attest that I have reviewed the information contained in this Report for MONTEBELLO. 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 purposes of the Act, for the reporting year listed within this Report.



Jean Francois Leclerc on behalf of Montebello Packaging Inc.

President, May 31, 2026

I have the authority to bind Montebello Packaging Inc.