



Fighting Against Forced Labour and Child Labour in Supply Chains Act (“Act”) Report

Reporting Entity’s Legal Name and Business Number:

Covia Holdings LLC and its consolidated subsidiaries, including Covia Canada Ltd./Covia Canada Ltée (collectively, “Covia” or the “Company”)

Covia Holdings LLC Canadian Business No. N/A

Covia Canada Ltd./Covia Canada Ltée Canadian Business No. 12209 9252 RC0002

Financial Reporting Year:

January 1, 2023 through December 31, 2023

Identification of Reporting Obligations in Other Jurisdictions:

N/A

Entity Categorization According to the Act:

Covia has a Canadian business presence because it has a place of business in Canada, does business in Canada, and has assets in Canada. Covia had at least CAD \$20 million in assets for at least one of its two most recent financial years, has generated at least CAD \$40 million in revenue for at least one of its two most recent financial years, and employed an average of at least 250 employees in Canada during at least one of its two most recent financial years.

Reporting Obligation:

Covia operates in the mining, quarrying, and oil and gas extraction industry and produces and sells goods in Canada and elsewhere. Covia also imports goods into Canada that were produced outside of Canada.

Location:

The corporate headquarters for Covia is located at 3 Summit Park Drive, Suite 700, Independence, Ohio 44131 USA. Covia has operations in the Canadian provinces of Ontario and Québec.

ANNUAL REPORT

I. INTRODUCTION

Covia is committed to the highest standards of ethics and business conduct, including but not limited to ethical sourcing and complying with laws and regulations of all the jurisdictions within which Covia conducts business and operates worldwide. Our practices and principles for behavior are in line with the United Nations Universal Declaration of Human Rights and are supported by our code of conduct, which applies to all employees, members of the board, officers, vendors, suppliers, contractors, and other stakeholders of the Company, as well as other applicable policies.



II. COMPANY BACKGROUND

Covia is a leading provider of diversified mineral solutions to a variety of industrial markets, including glass, ceramics, coatings, metals, foundry, polymers, construction, water filtration, sports and recreation, and oil and gas. We serve our customers through a broad array of high-quality products, including high-purity silica sand, nepheline syenite, feldspar, clay, kaolin, resin and coated materials, delivered through our comprehensive distribution network.

a. Structure

Covia Holdings LLC is a Delaware limited liability company with operations dating back as early as January 1970. Covia currently owns and controls several operating subsidiaries, all of which operate in the mining, quarrying, and oil and gas extraction industry and are bound by the same Company policies and procedures.

The Company is managed by a board of managers and functional departments are managed by executive and senior leadership teams pursuant to the Company's limited liability company agreement.

At the end of 2023, Covia employed 2,510 employees, 254 of whom were employed in Canada.

b. Activities

Covia operates a portfolio of well-invested and long-life assets with 48 production facilities, three corporate laboratories, and ten offices across the United States, Canada, Mexico, and Denmark. Covia's broad portfolio of raw minerals and mineral products allows Covia to offer a multi-mineral product mix to its customers and distributors worldwide. Covia sold thousands of tons of such products in 2023.

c. Supply Chain

As Covia is the producer of the raw minerals that go into our products, our supply chain includes goods and services that support our operations and packaging of the final products, including maintenance, repair and operations equipment and machine parts and lubricants, resins, additives, colorants, flocculants, and packaging materials. Of the suppliers used by Covia, the majority are based in the United States (85%), Canada (14%), and Mexico (<1%). In 2023, Covia also worked with at least one supplier in each of Australia, Belgium, China, Denmark, Germany, India, Puerto Rico, and the UK.



III. WORKFORCE AND SUPPLY CHAIN DUE DILIGENCE PROGRAM

a. Policies and Due Diligence Processes

In 2023, Covia developed and implemented a human rights policy that includes, among other principles, that: (i) the Company, our contractors, and our vendors do not employ forced labor or child labor in our operations in any country where we operate; (ii) Covia does not allow or require employees to work more than the maximum number of hours permitted by applicable law; and (iii) Covia will not knowingly engage with a supplier that directly or indirectly engages in forced labor or child labor. Covia adheres to this policy by ensuring our applicants voluntarily apply for open positions through Covia's career website, conducting pre-screen interviews of these applicants through our human resources department (which includes asking applicants if they are over the age of 18), and confirming applicant age by verification with government-issued personal identification when an offer of employment is extended. Covia also follows all applicable state, provincial, federal, and national rules and regulations regarding employee rights and posts those rights and references to resources where employees can see them.

Covia also has a code of business conduct and ethics which provides basic principles and guidelines to assist managers, officers, and other employees of Covia in complying with the legal and ethical requirements governing Covia's business conduct. Each employee must become familiar with and agree to comply with this code as a condition of employment.

Additionally, Covia aligns with companies who share our values and are prepared to act in accordance with the universal principles of human rights, labor, environment, and ethical behavior set forth by the United Nations Global Compact. Covia uses requests for information and proposals when searching for suppliers with whom we wish to partner. Covia also enhanced our business partner code of conduct in 2023, which sets out the minimum standards expected from our valued third parties with whom we do business, which includes, among other principles, prohibiting the use of forced labor and/or child labor in Covia's supply chain. Suppliers who are new to working with Covia are required to acknowledge this code. In 2023, more than 99% of new suppliers acknowledged the code, with the remainder demonstrating compliance with equivalent standards. Covia also performed an analysis of existing suppliers of foreign direct materials during the reporting year, which led to those suppliers acknowledging the code. Not acknowledging the code, or any suspected violation of the code, may result in suspension or termination of our relationship with the supplier.



b. Policy Enforcement and Training

At Covia, we encourage a “see something, say something” approach to policy and code enforcement. Our employees are informed of their obligation to report policy and/or code violations through regular communications, including Covia Communications (e-mail blasts) and Covia TV (televisions prominently located at our sites to air important Covia content), as well as annual company-wide legal compliance training. Covia’s policies and codes are also available through Covia’s intranet. Employees with concerns regarding questionable behavior or bad actors are encouraged to share their questions, concerns, or suggestions with someone in a position of management or human resources. Additionally, team members can submit concerns or suspected violations through our whistleblower hotline, available 24/7 in English, Spanish, and French. Covia does not permit retaliation of any kind for good faith reports.

Covia also offers opportunities for continuing education and training courses. For example, in 2023, our procurement director attended supplier diversity training presented by the Supply Chain Management Association of Ontario. A variety of training and learning materials are also available to Covia employees through our human resource management tool.

c. Risk Assessment Review

Covia’s audit committee holds quarterly meetings to review, among other things, employee relations and whistleblower hotline inquiries. Due to Covia’s diligent hiring practices, we have not identified any risks of the Company engaging in forced labor or hiring child labor in any step of our hiring process, in any function of the Company, or in any part of our workforce.

Further, based on the types of products Covia produces, sells, and imports, ad hoc analyses performed in 2023 of the same, and no suspicions or findings of negative activity, Covia has not identified forced labor or child labor risks with respect to the location of supply chain activities, operations, or facilities in our supply chain.

d. Remediation Measures

Covia has not identified any forced labor or child labor risk in our Company or supply chain, nor have we identified or taken corrective action for loss of income to vulnerable families, but we remain diligent in enhancing our employee training and risk assessment review. Covia’s compliance procedures help to ensure prompt and consistent corrective action for misconduct, including but not limited to terminating employees and relationships with suppliers and reporting misconduct and bad actors as required by applicable laws. We also work with suppliers to align with our human rights policy and code of business conduct and ethics and are willing to work with suppliers to address areas for improvement for such alignment.