



**Handgards<sup>®</sup> LLC**

901 Hawkins Blvd • El Paso, TX 79915  
Main Phone 800 351 8161 • 915 779 6606  
Fax 915 779 1312

May 6, 2025

RE: Handgards Compliance with Canada S211

To Whom It May Concern:

In accordance with the requirements of the Act, in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. 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 above.

I have the authority to bind the company.

A handwritten signature in black ink, appearing to read "Joe Kubicek". The signature is written in a cursive, flowing style.

Joseph Kubicek  
CEO



## PART 1

### Submission Information

**\*This report is for :**

Note: Government institution has the same meaning as in [section 3 of the Access to Information Act](#).

An entity



A government institution



**\*State the legal name of the reporting entity or government institution:**

HANDGARDS LLC

**\*Reporting year:**

Select from the drop down menu the applicable reporting deadline for which you are submitting a report):

May 31, 2025



### **\*Financial year covered by report (Start Date):**

Note: All reports must reference the activities undertaken during the entity or government institution's previous financial year. Reports may be submitted on or before May 31. As such, the submission date of the report will determine which financial year you are reporting on.

Month

January

Day

1

Year

2024

### **\*Financial year covered by report (End Date):**

Note: All reports must reference the activities undertaken during the entity or government institution's previous financial year. Reports may be submitted on or before May 31. As such, the submission date of the report will determine which financial year you are reporting on.

Month

December

Day

31

Year

2024

**\*Is this a revised version of a report that was already submitted this reporting year?**

Yes

☐

No

☒

**Business number(s) (if applicable, provide the business number of the entity completing this questionnaire):**

869429837RM0001

**\*Is this a joint report?**

Yes

☐

No

☒

**\*Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction?**

Yes

☐

No

☒

**\*Which of the following categories apply to the entity? Select all that apply.**

Listed on a stock exchange in Canada	<input type="checkbox"/>
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Canadian business presence (select all that apply):

Has a place of business in Canada	<input type="checkbox"/>
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Does business in Canada	<input checked="" type="checkbox"/>
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Has assets in Canada	<input type="checkbox"/>
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Meets size-related thresholds (select all that apply):

Has at least \$20 million in assets for at least one of its two most recent financial years	<input checked="" type="checkbox"/>
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Has generated at least \$40 million in revenue for at least one of its two most recent financial years	<input checked="" type="checkbox"/>
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Employs an average of at least 250 employees for at least one of its two most recent financial years	<input checked="" type="checkbox"/>
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**\*In which of the following sectors or industries does the entity operate? Select all that apply.**

Agriculture, forestry, fishing and hunting

☐

Mining, quarrying, and oil and gas extraction

☐

Utilities

☐

Construction

☐

Manufacturing

☒

Wholesale trade

☐

Retail trade

☐

Transportation and warehousing

☐

Information and cultural industries

☐

Finance and insurance

☐

Real estate and rental and leasing

☐

Professional, scientific and technical services	<input type="checkbox"/>
Management of companies and enterprises	<input type="checkbox"/>
Administrative and support, waste management and remediation services	<input type="checkbox"/>
Educational services	<input type="checkbox"/>
Health care and social assistance	<input type="checkbox"/>
Arts, entertainment and recreation	<input type="checkbox"/>
Accommodation and food services	<input type="checkbox"/>
Other services (except public administration)	<input type="checkbox"/>
Public administration	<input type="checkbox"/>
Other, please specify:	<input type="checkbox"/>

**\*Manufacturing**

Food manufacturing	<input type="checkbox"/>
Beverage and tobacco product manufacturing	<input type="checkbox"/>

Textile mills

☐

Textile product mills

☐

Apparel manufacturing

☐

Leather and allied product manufacturing

☐

Wood product manufacturing

☒

Paper manufacturing

☐

Printing and related support activities

☐

Petroleum and coal product manufacturing

☐

Chemical manufacturing

☐

Plastics and rubber products manufacturing

☒

Non-metallic mineral product manufacturing

☐

Primary metal manufacturing

☐

Fabricated metal product manufacturing

☐



Machinery manufacturing

☐

Computer and electronic product manufacturing

☐

Electrical equipment, appliance and component manufacturing

☐

Transportation equipment manufacturing

☐

Furniture and related product manufacturing

☐

Other manufacturing

☐

**\*In which country is the entity headquartered or principally located?**

United States of America



## Part 2

## Annual Report

**\*Which of the following accurately describes the entity's structure?**

Corporation	<input checked="" type="checkbox"/>
Trust	<input type="checkbox"/>
Partnership	<input type="checkbox"/>
Other unincorporated organization	<input type="checkbox"/>

**\*Which of the following accurately describes the entity's activities? Select all that apply.**

Note: If an organization is not involved in any of the following activities, then it may not be required to report under the Supply Chains Act, even if it meets the definition of **entity**. Entities that do not engage in these activities but wish to submit a report in the interest of transparency may do so by selecting 'Other' below and further describing their activities in the PDF report.

Producing goods (includes manufacturing, extracting, growing and processing) in Canada	<input type="checkbox"/>
Producing goods (includes manufacturing, extracting, growing and processing) outside Canada	<input checked="" type="checkbox"/>
Importing into Canada goods produced outside Canada	<input checked="" type="checkbox"/>
Controlling an entity engaged in producing goods in Canada	<input type="checkbox"/>

Controlling an entity engaged in producing goods outside Canada

☐

Controlling an entity engaged in importing into Canada goods produced outside Canada

☐

Other

☐

**\*What steps has the entity taken in its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply.**

Mapping activities

☐

Mapping supply chains

EXHIBIT A, B

☒

Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

EXHIBIT C

☒

Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains

☒

Developing and implementing an action plan for addressing forced labour and/or child labour

☒

Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily

☐

Addressing practices in the organization's activities and supply chains that may cause or contribute to the risk of forced labour and/or child labour

☒

Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains

☒

Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour

☐

Requiring suppliers to have policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains

☒

Developing and implementing child protection policies and processes

☐

Developing and implementing anti-forced labour and/or -child labour contractual clauses

☐

Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists

☒

Auditing suppliers

☒

Monitoring suppliers

☒

Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour

☐

Developing and implementing grievance mechanisms to address complaints in the workplace	<input type="checkbox"/>
Developing and implementing training and awareness materials on forced labour and/or child labour	<input type="checkbox"/>
Developing and implementing procedures to track effectiveness in addressing forced labour and/or child labour	<input type="checkbox"/>
Engaging with supply chain partners on the issue of addressing forced labour and/or child labour	<input checked="" type="checkbox"/>
Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour	<input type="checkbox"/>
Engaging directly with workers and families potentially affected by forced labour and/or child labour to assess and address risks	<input type="checkbox"/>
Information not available for this reporting period	<input type="checkbox"/>

**Please provide additional information describing the steps taken (if applicable) (3,000 character limit).**

REFERENCE EXHIBITS A, B FOR EXAMPLE OF SUPPLY CHAIN MAPPING FOR POINT 2 OF PREVIOUS SECTION. REFERENCE EXHIBIT C FOR EXAMPLE OF SUPPLIER CODE OF CONDUCT.
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**\*Does the entity currently have policies and/or due diligence processes in place related to forced labour and/or child labour?**

Yes



No



**\*If yes, which elements of the policies and/or due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply.**

Embedding responsible business conduct into policies and management systems

EXHIBIT D



Identifying and assessing potential and actual adverse impacts in operations, supply chains and business relationships



Ceasing, preventing or mitigating potential and actual adverse impacts



Tracking implementation and results



Communicating how impacts are addressed



Providing for or cooperating in remediation when appropriate



**\*Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

Note : Entities are being asked to **indicate if they have considered the ways in which their activities and supply chains could potentially cause, contribute to, or be linked (directly or indirectly) to actual or potential forced labour or child labour**. Identifying parts of an entity's activities and supply chains that carry a risk does not indicate that forced labour or child labour was or is actually being used.

Yes, we have identified parts of our activities and/or supply chains that carry a risk to the best of our knowledge and will continue to identify emerging risks.



Yes, we have started the process of identifying parts of our activities and / or supply chains that carry risks, but there are still gaps in our assessments.



No, we have not started the process of identifying parts of our activities and / or supply chains that carry risks of forced labour or child labour being used.



**\*If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.**

The sector or industry it operates in



The types of products it produces or imports



The locations of its activities, operations or factories



The types of products it sources

☐

The raw materials or commodities used in its supply chains

☐

Tier one (direct) suppliers

☒

Tier two suppliers

☐

Tier three suppliers

☐

Suppliers further down the supply chain than tier three

☐

The use of outsourced, contracted or subcontracted labour

☐

The use of migrant labour

☐

The use of forced labour

☐

The use of child labour

☐

None of the above

☐



**\*Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply.**

Agriculture, forestry, fishing and hunting

☐

Mining, quarrying, and oil and gas extraction

☐

Utilities

☐

Construction

☐

Manufacturing

☐

Wholesale trade

☐

Retail trade

☐

Transportation and warehousing

☐

Information and cultural industries

☐

Finance and insurance

☐

Real estate and rental and leasing

☐

Professional, scientific and technical services

☐

Management of companies and enterprises

☐

Administrative and support, waste management and remediation services

☐

Educational services

☐

Health care and social assistance

☐

Arts, entertainment and recreation

☐

Accommodation and food services

☐

Other services (except public administration)

☐

Public administration

☐

None of the above

☒

Other, please specify:

☐

**Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the organization has taken to assess and manage that risk (if applicable) (3,000 character limit)**

**\*Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

Yes

☐

No

☐

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

☒

**\*Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains?**

Yes

☐

No

☐

Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

☒

**\*Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains?**

Yes

☐

No

☐

Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

☒

**\*If yes, is the training mandatory?**

Yes, the training is mandatory for all employees.

☐

Yes, the training is mandatory for employees making contracting or purchasing decisions.

☒

Yes, the training is mandatory for some employees.

☐

No, the training is voluntary.

☐

**\*Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?**

Yes

☒

No

☐

**\*If yes, what method does the entity use to assess its effectiveness? Select all that apply.**

Setting up a regular review or audit of the entity's policies and procedures related to forced labour and child labour

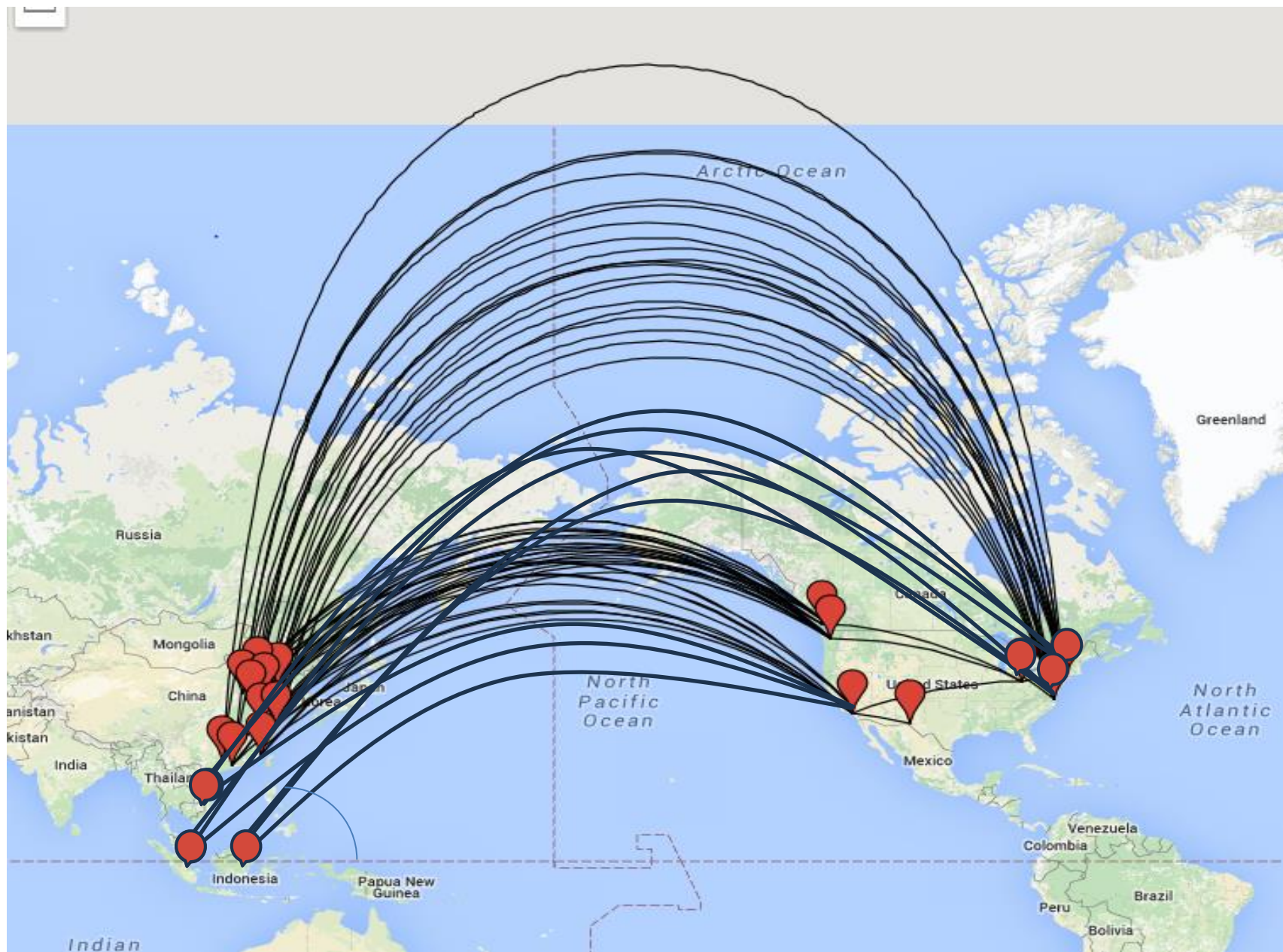
☐

Tracking relevant performance indicators, such as levels of employee awareness, numbers of cases reported and solved through grievance mechanisms and numbers of contracts with anti-forced labour and -child labour clauses ☐

Partnering with an external organization to conduct an independent review or audit of the entity's actions ☒

Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators ☐

EXHIBIT A



BUSINESS PARTNER (Foreign Supplier/Ocean Carrier):								
Importer Destination:								
CARGO/DATA FLOW AND PARTNERS								
<b>Note:</b> Please ensure that every business partner in the supply chain is accounted for. Please insert row for carriage or handling that is subcontracted by a business partner within this supply chain.								
Partner Role	Partner Company Name	Process	Cargo Movement - if applicable	Name, Phone, Email, Address of main contact for Partner	C-TPAT Compliant? (Yes/No/Unknown)	Days cargo is "At Rest" at this stage	Transport Mode	If entity physically handles cargo, who selects them as a provider?
Foreign Manufacturer								
Freight Broker and Export Broker								
Foreign Carrier								
Consolidator								
U.S. Port of Entry								
Drayage								
Warehouse / Deconsolidator								
U.S. Carrier								
U.S. Terminal								
U.S. Customs Broker								
U.S. Distribution Center / Consignee								

**Instructions:**

Partner role: Please list description of partner's role in the supply chain (forwarder, carrier, broker, etc.)

Partner Company Name: Include the full legal name of the business partner

Process: Describe how business partner completes their responsibilities (i.e. production, packing, document production, transportation, storage, etc.)

Cargo Movement: Explain how business partner prepares the goods and handles movement (i.e. moving goods from point A to point B, point of departure, etc.)

Contact details of Partner: List contact information for location where the goods are handled or documents are processed.

C-TPAT Compliant: Indicate whether Partner is C-TPAT compliant. If yes, include SVI number.





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### **Code of Conduct for Suppliers**

Handgards believes that all employees deserve to be treated with dignity and respect. In each and every aspect of the employment relationship, employers need to act towards their employees as they would themselves want to be treated. The 100% satisfaction of our internal customers – our employees – is essential to the 100% satisfaction of our external customers. Moreover, Handgards is committed to a policy of complying with the law wherever it does business, and to maintaining high standards of business conduct. As a result, Handgards has established a well-respected record and reputation for business honesty and integrity. These principles apply globally, form the basis for Handgards own ethical business practices, and are cornerstones to Handgards success.

Handgards strongly believes that those suppliers who are approved to do business with the Handgards System should follow the same philosophy, and, in the best interest of the System, Handgards will refuse to approve or do business with those who do not uphold, in action as well as words, the same principles. Handgards recognizes that its suppliers are independent businesses. Indeed, it honors that very independence because it provides strength to the relationship. Nonetheless, actions by those with whom Handgards does business are sometimes attributed to Handgards itself, affecting its reputation and the goodwill it has with its customers and others. It is only natural then that Handgards expects its partners in business to act with the same level of honesty and integrity.

For these reasons, Handgards has established the following policy. Compliance with this policy is required of all suppliers, and is the responsibility of each individual supplier. Suppliers shall ensure that their Subcontractors comply with this policy for employees working on product supplied to Handgards. Failure to comply with this policy will be sufficient cause for Handgards to exercise its right to revoke a supplier's approved status. Handgards reserves the right, as a condition of continuation of approval, to conduct (or have its designee conduct) periodic, unannounced inspections of suppliers and their facilities and business practices to verify compliance with these standards.

### **COMPLIANCE WITH APPLICABLE LAWS AND STANDARDS**

All business activities of Handgards suppliers must conform to all applicable national and local legal requirements, customs, and published industry standards pertaining to employment and manufacturing. If statutory requirements and published industry standards conflict, suppliers must, at a minimum, be in compliance with the one which, by law, takes precedence.

## **EMPLOYMENT PRACTICES**

**Prison or Forced Labor:** The use of prison or forced labor by a supplier is absolutely forbidden. Likewise, the use of labor under any form of indentured servitude is prohibited, as is the use of physical punishment confinement, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse as a method of discipline or control. Suppliers will not themselves utilize factories or production facilities that force work to be performed by unpaid or indentured laborers or those who must otherwise work against their will, nor shall they contract for the production of products for Handgards with Subcontractors that utilize such practices or facilities.

**Child Labor:** The use of child labor by suppliers is strictly prohibited. Suppliers are prohibited from using workers under the legal age of employment for the type of work in the country where the suppliers performs work for Handgards. If the country in which the supplier is doing business does not define “child” for purposes of minimum age of employment, the minimum age of employment shall be 15 years of age, and the employment of any individual in the production of products for Handgards below that age shall be strictly prohibited. If local law allows the minimum age of employment to be 14 years of age or younger, the minimum age of employment shall be 14 years of age, and the employment of any individual in the production of products for Handgards below that age shall be strictly prohibited. In either situation, minors between the ages of 14 and 16 may only be employed to work and only be permitted to work during periods of time when they are not required by law to attend school (except as may be permitted under apprenticeship or other similar programs in which the minor is lawfully participating).

**Working Hours:** Suppliers must ensure that all employees working on products supplied to Handgards do so in compliance with all applicable national and local laws and with published industry standards pertaining to the number of hours and days worked. Such employees are to be provided with reasonable daily and weekly work schedules and adequate allowance is to be made for time off. Except in extraordinary business circumstances, employees will not be required to work more than either (a) the limits on regular and overtime hours allowed by local law; or (b) 60 hours per week, inclusive of overtime. Adequate time off shall be at least one day off per

week, except in extraordinary business circumstances. In the event of conflict between a statute and a published industry standard pertaining to this issue, compliance must be with the one taking precedence under national law.

**Compensation:** Supplier employees working on product supplied to Handgards must be fairly compensated and provided with wages and benefits that comply with applicable national and local laws. This includes appropriate compensation for overtime work and other premium pay situations required by applicable national and local laws. If local laws do not provide for overtime pay, suppliers will pay at least regular wages for overtime work.

**Non-Discrimination:** Suppliers shall implement a policy that conforms to local and national law prohibiting discrimination in hiring and employment practices on the ground of race, color, religion, sex, age, physical ability, national origin, or any other applicable prohibited basis.

**Workplace Environment:** Suppliers shall provide their employees with safe and healthy working and, where provided, living conditions. At a minimum, potable drinking water, adequate, clean restrooms, adequate ventilation, fire exits and essential safety equipment, an emergency aid kit, access to emergency medical care, and appropriately-lit work stations must be provided. In addition, facilities be constructed and maintained in accordance with the standards set by applicable codes and ordinances.

**Notification to Employees:** Suppliers shall notify employees of the terms of these standards and post the terms, on the supplier's letterhead and in the local language, in a prominent place accessible to all employees.

## **INSPECTIONS**

**By Suppliers:** Each supplier shall designate one or more of its management staff to be responsible for monitoring their factories and production facilities, and the production facilities of their Subcontractors used in the production of products for Handgards, for compliance with the standards set forth herein. Each supplier must conduct and document such monitoring no less frequently than on an annual basis.

**By Handgards:** Handgards reserves the right to conduct or have its designee conduct unannounced inspections of suppliers' and their business practices, records, facilities, and, where provided by supplier, housing accommodations, as well as private interviews with employees. Handgards will provide a 24 hour notice prior to visit. Suppliers will keep all information necessary to document compliance with these standards readily accessible. Any supplier who refuses to allow such inspections or interviews, or who does not comply with these standards, is subject to immediate termination of its status as an approved suppliers.

## Acknowledgement Page

The undersigned acknowledges receipt of the attached “Code of Conduct” for suppliers and agrees to comply therewith for each of its facilities worldwide as listed on the attached pages.

Further, the undersigned acknowledges as follows:

1. I am authorized to bind the businesses listed below to the terms stated herein
2. We shall establish such inspections and monitoring procedures as are appropriate for our facilities and for facilities of any applicable subcontractors as are agreed between us, and the undersigned.

Company: \_\_\_\_\_

Officer Name, Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

### Manufacturing Facility

Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Responsible Contact: \_\_\_\_\_

Phone Number: \_\_\_\_\_0

[Company](#)  
[Address](#)  
[Address](#)  
[Phone](#)

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# ENVIRONMENTAL AND SOCIAL RESPONSIBILITY POLICIES

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OUR COMPANY IS COMMITTED TO EXHIBITING LEADERSHIP IN ENVIRONMENTAL AND SOCIAL AFFAIRS IN ALL OF ITS BUSINESS ACTIVITIES. THE REQUIREMENTS LISTED BELOW APPLY TO ALL OF THE COMPANY'S OPERATIONS. THE COMPANY SHALL SEEK TO ENFORCE THESE POLICIES TO THE EXTENT FEASIBLE, TAKING INTO CONSIDERATION THE MARKET, NEEDS OF THE COMPANY, NEEDS OF THE CUSTOMERS, COMMUNITY EXPECTATIONS, AND OTHER RELEVANT FACTORS.

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## **ENVIRONMENTAL RESPONSIBILITY POLICY**

### **GENERAL**

- MEET OR EXCEED ALL APPLICABLE ENVIRONMENTAL LEGAL REQUIREMENTS FOR ALL COMPANY ACTIVITIES, PRODUCTS, AND SERVICES.
- BE AN ENVIRONMENTALLY RESPONSIBLE NEIGHBOR IN THE COMMUNITIES WHERE THE COMPANY OPERATES AND ACT PROMPTLY AND RESPONSIBLY TO CORRECT INCIDENTS OR CONDITIONS THAT ENDANGER HEALTH, SAFETY, OR THE ENVIRONMENT.

### **PREVENTION & LEADERSHIP**

- RECOGNIZE THAT POLLUTION PREVENTION, BIODIVERSITY, AND RESOURCE CONSERVATION ARE KEY TO A SUSTAINABLE ENVIRONMENT AND SEEK TO INTEGRATE THESE CONCEPTS INTO THE COMPANY'S BUSINESS DECISION-MAKING.
- CONSERVE NATURAL RESOURCES BY REUSING AND RECYCLING MATERIALS, PURCHASING RECYCLED MATERIALS, AND USING RECYCLABLE PACKAGING AND OTHER MATERIALS WHERE FEASIBLE.
- UTILIZE PRODUCTS THAT ARE SAFE FOR THEIR INTENDED USE, ENERGY EFFICIENT, PROTECTIVE OF THE ENVIRONMENT, AND REUSABLE OR RECYCLABLE.
- UTILIZE PROCESSES THAT DO NOT ADVERSELY AFFECT THE ENVIRONMENT, INCLUDING DEVELOPING AND IMPROVING OPERATIONS AND TECHNOLOGIES TO MINIMIZE WASTE, PREVENT AIR, WATER, AND OTHER POLLUTION, MINIMIZE HEALTH AND SAFETY RISKS, AND DISPOSE OF WASTE SAFELY AND RESPONSIBLY.
- ENSURE THE RESPONSIBLE USE OF ENERGY THROUGHOUT THE COMPANY'S BUSINESS, INCLUDING CONSERVING ENERGY, IMPROVING ENERGY EFFICIENCY, AND GIVING PREFERENCE TO RENEWABLE OVER NON-RENEWABLE ENERGY SOURCES WHEN FEASIBLE.
- ASSESS THE ENVIRONMENTAL CONDITION OF THE COMPANY'S PROPERTY INTERESTS AND APPROPRIATELY ADDRESS THE ENVIRONMENTAL IMPACTS CAUSED BY THESE PROPERTIES.
- MINIMIZE THE ENVIRONMENTAL RISKS TO EMPLOYEES AND COMMUNITIES IN WHICH THE COMPANY OPERATES.

## **CONTINUED IMPROVEMENT**

- STRIVE TO CONTINUALLY IMPROVE THE COMPANY'S ENVIRONMENTAL MANAGEMENT SYSTEM AND RELATED POLICY, PROGRAMS, AND PERFORMANCE BASED ON THE RESULTS OF PERIODIC REVIEWS AND TAKING INTO ACCOUNT REGULATORY CHANGES, COMPANY NEEDS, CUSTOMER NEEDS, TECHNICAL DEVELOPMENTS, SCIENTIFIC UNDERSTANDING, AND COMMUNITY EXPECTATIONS.
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## **SOCIAL RESPONSIBILITY POLICY**

### **GENERAL**

- MAINTAIN THE HIGHEST STANDARDS OF INTEGRITY AND CORPORATE GOVERNANCE PRACTICES TO ENSURE EXCELLENCE IN DAILY OPERATIONS AND TO PROMOTE CONFIDENCE IN THE COMPANY'S GOVERNANCE SYSTEMS.
- CONDUCT BUSINESS IN AN OPEN, HONEST, AND ETHICAL MANNER.
- RECOGNIZE THE IMPORTANCE OF PROTECTING ALL OF THE COMPANY'S HUMAN, FINANCIAL, PHYSICAL, INFORMATIONAL, SOCIAL, ENVIRONMENTAL, AND REPUTATIONAL ASSETS.
- ADVISE THE COMPANY'S PARTNERS, AND SUPPLIERS OF ITS SOCIAL RESPONSIBILITY POLICY AND WORK WITH THEM TO ACHIEVE CONSISTENCY WITH THIS POLICY.

### **STAKEHOLDER RELATIONS**

- ENGAGE STAKEHOLDERS CLEARLY, HONESTLY, AND RESPECTFULLY.
- COMMITTED TO TIMELY AND MEANINGFUL DIALOGUE WITH ALL STAKEHOLDERS, INCLUDING BUT NOT LIMITED TO SHAREHOLDERS, CUSTOMERS, AND EMPLOYEES, LOCAL COMMUNITIES, GOVERNMENTS, REGULATORS, AND LANDOWNERS.

### **EMPLOYEE RELATIONS**

- PROVIDE A SAFE AND HEALTHY WORKPLACE AND ENSURE THAT EMPLOYEES ARE PROPERLY TRAINED.
- ENSURE THAT EMPLOYEES AND WORKPLACES HAVE APPROPRIATE SAFETY AND EMERGENCY EQUIPMENT.
- TREAT EMPLOYEES FAIRLY AND WITH DIGNITY, TAKING THEIR GOALS AND ASPIRATIONS INTO CONSIDERATION.
- EMBRACE DIVERSITY IN THE WORKPLACE.
- APPLY FAIR LABOR PRACTICES WHILE RESPECTING THE NATIONAL AND LOCAL LAWS OF THE COUNTRIES AND COMMUNITIES IN WHICH THE COMPANY OPERATES.
- PROVIDE EQUAL OPPORTUNITY IN ALL ASPECTS OF EMPLOYMENT AND NOT ENGAGE IN OR TOLERATE UNLAWFUL WORKPLACE CONDUCT, INCLUDING DISCRIMINATION, INTIMIDATION, OR HARASSMENT.
- ALL EMPLOYEES ARE RESPONSIBLE AND ACCOUNTABLE FOR CONTRIBUTING TO A SAFE WORKING ENVIRONMENT, FOR FOSTERING SAFE WORKING ATTITUDES, AND FOR OPERATING IN A SOCIALLY RESPONSIBLE MANNER.

### **HUMAN RIGHTS**

- STRIVE TO WORK WITH GOVERNMENTS AND AGENCIES TO SUPPORT AND RESPECT HUMAN RIGHTS WITHIN THE COMPANY'S SPHERE OF INFLUENCE.
- NO TOLERANCE FOR HUMAN RIGHTS ABUSES AND REFUSAL TO ENGAGE OR BE COMPLICIT IN ANY ACTIVITY THAT SOLICITS OR ENCOURAGES HUMAN RIGHTS ABUSE.

- STRIVE TO BUILD TRUST, DELIVER MUTUAL ADVANTAGE, AND DEMONSTRATE RESPECT FOR HUMAN DIGNITY AND RIGHTS IN ALL RELATIONSHIPS THE COMPANY ENTERS INTO, INCLUDING RESPECT FOR CULTURES, CUSTOMS, AND VALUES OF INDIVIDUALS AND GROUPS.

## **COMMUNITY**

- ENCOURAGE AND PROMOTE COLLABORATIVE, CONSULTATIVE, AND PARTNERSHIP APPROACHES IN COMMUNITY INVESTMENT PROGRAMS.
- SEEK OPPORTUNITIES TO CONTRIBUTE TO LOCAL COMMUNITIES' QUALITY OF LIFE BY SUPPORTING INNOVATIVE PROGRAMS IN HEALTH, EDUCATION, SOCIAL SERVICES, AND THE ENVIRONMENT, AS WELL AS CULTURAL AND CIVIC PROJECTS.
- STRIVE TO PROVIDE EMPLOYMENT AND ECONOMIC OPPORTUNITIES IN THE COMMUNITIES IN WHICH THE COMPANY OPERATES.

## **CONTINUED IMPROVEMENT**

- STRIVE TO CONTINUALLY IMPROVE THE COMPANY'S SOCIAL MANAGEMENT SYSTEM AND RELATED POLICY, PROGRAMS, AND PERFORMANCE BASED ON THE RESULTS OF PERIODIC REVIEWS AND TAKING INTO ACCOUNT REGULATORY CHANGES, COMPANY NEEDS, CUSTOMER NEEDS, TECHNICAL DEVELOPMENTS, SCIENTIFIC UNDERSTANDING, AND COMMUNITY EXPECTATIONS.

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Corporate strategies, policies and guidelines must support this commitment to leadership in environmental and social affairs. Every employee and contractor of the Company must follow this policy and report any concerns to Company management. Management is expected to take prompt corrective action.

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