

Statement on Human Rights & Workforce Ethics

The Xamax Industries, Inc. **Code of Conduct & Governing Principles of Employment** underscore our commitment to ensuring a diverse and inclusive workplace that supports equal opportunity. Our Non-Discrimination and Anti-Harassment Policy promote a work environment in which all individuals are treated with respect and dignity. These policies are central to our expectation that employees embody our values including respect for human rights in the workplace. We continue to expand our inclusive culture, focus on our people and deliver innovative solutions.

While we believe that governments around the world bear primary responsibility for safeguarding human rights, we acknowledge our professional responsibility to respect human rights as described in the International Bill of Human Rights and the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and associated conventions. Our approach to respecting and protecting human rights is informed by the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

EQUAL EMPLOYMENT POLICY/ ETHICAL RECRUITING/ AND WORKING CONDITIONS

Xamax Industries Inc. provides equal employment opportunities to their employees and applicants for employment.

Xamax Industries, Inc. is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, creed, color, religion, alienage or national origin, ancestry, citizenship status, age, disability or handicap, sex, marital status, veteran status, sexual orientation, genetic information or any other characteristic protected by applicable federal, state or local laws. Our management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities and general treatment during employment.

Xamax Industries, Inc strictly prohibits any form of unlawful employee harassment or discrimination based on any of the characteristics mentioned above. Improper interference with the ability of other employees to perform their expected job duties is absolutely not tolerated. The Company will not allow any form of retaliation against individuals who raise issues of equal employment opportunity.

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Retaliation means adverse conduct taken because an individual reported an actual or perceived violation of this policy, opposed practices prohibited by this policy, or participated in the reporting and investigation process described below. “Adverse conduct” includes but is not limited to:

- (1) shunning and avoiding an individual who reports harassment, discrimination or retaliation.
- (2) express or implied threats or intimidation intended to prevent an individual from reporting harassment, discrimination or retaliation; or
- (3) denying employment benefits because an applicant or employee reported harassment, discrimination or retaliation or participated in the reporting and investigation process.

Complaints of discrimination should be filed according to the procedures described in the Harassment and Complaint Procedure.

Xamax Industries Inc. is committed to creating and maintaining a workplace in which all employees have an opportunity to participate and contribute to the success of the business and are valued for their skills, experience, and unique perspectives. This commitment is embodied in company policy and the way we do business at Xamax Industries Inc. and is an important principle of sound business management.

ADA Reasonable Accommodation

Xamax is committed to comply with all applicable provisions of the American with Disabilities (ADA). It is Xamax policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual’s disability or perceived disability so long as the employee can perform the essential functions of the job. Consistent with this policy of nondiscrimination, Xamax, will provide reasonable accommodations to a qualified individual with a disability as defined by the ADA, who has made Xamax aware of his or her disability, provided that such accommodation does not constitute undue hardship on Xamax. Employees with a disability who believe they need reasonable accommodation to perform the essential functions of their job should contact the Human Resources Manager. All such inquiries or complaints will be treated as confidential to the extent permissible by law.

Accommodating Pregnancy

Xamax strictly prohibits discrimination against an employee or job applicant because of pregnancy, childbirth, or other related conditions (e.g., breastfeeding or expressing milk at work), in any work-related area, and in every phase of the employment process, including but not limited to recruiting, hiring, introductory period, training, placement and employee development, promotion, transfer, compensation, benefits, educational assistance, social and recreational programs, employee facilities, and termination. Xamax is open to discussing other types of accommodation as well. Xamax will provide appropriate facilities for an employee who wishes to express milk during the workday. Xamax will not require an employee to accept a reasonable accommodation that is not needed or require an employee to take a leave of absence where a reasonable accommodation could have been made instead. Any employee who would like to request an accommodation for pregnancy should speak to Human Resources.

Anti- Harassment Policy, Including Sexual Harassment

Sexual and other unlawful harassment is in violation of Title VII of the Civil Rights Act of 1964, as amended, as well as other state laws. Xamax Industries, Inc. believes that every employee should feel safe and comfortable while doing their job and while striving to advance in their career according to their talents and abilities. Xamax is committed to maintaining a workplace that is free of harassment or intimidation based on a person's race, color, religion, creed, age, sex, sexual orientation, gender identity or expression, marital status, national origin, ancestry, membership in the Armed Forces, veteran status, genetic information, pregnancy, disability, or any other characteristic protected by law. Xamax prohibits harassment of one employee by another employee, a Manager, or a third party, and also prohibits harassment of any third party, such as clients or vendors, by any employee. Any violation of this policy will result in disciplinary action, up to and including termination of employment.

Unlawful harassment includes, but is not limited to, epithets; slurs; jokes; pranks; innuendo; comments; written or graphic material; stereotyping; or other threatening, hostile, or intimidating acts based on race, color, ancestry, national origin, gender, sex, sexual orientation, marital status, religion, age, disability, veteran status, or other characteristic protected by state or federal law.

For purposes of this policy, sexual harassment means any unwelcome sexual advances, requests for sexual favors, or any conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual, or
- Such conduct has the purpose or effect of unreasonably interfering with the individual's work performance or creating an intimidating, hostile, or offensive working environment.

The above is not meant to be an all-inclusive list of behaviors prohibited under this policy but rather examples of the types of behavior that are not acceptable in the workplace or anywhere else when

Respect for Human Rights & Diversity & Inclusion

Xamax respects and protects the human rights of our employees, contractors, business partners and the communities where they operate. It means treating everyone with dignity and respect, avoiding discrimination and harassment, and promoting diversity and inclusion. We embrace Supplier Diversity and aim to award a portion of our business to diverse groups such as: minority-owned, women-owned, veteran-owned, LGBTQ+-owned, small business owners and disability-owned businesses. Xamax provides a workplace culture that values diversity, inclusion, and respect for all individuals and does not tolerate any form of discrimination, harassment, or retaliation against employees who exercise their rights under this policy.

Women's Rights

Xamax respects and protects the principle that women are entitled to political, economic, and social equality.

Rights of Minorities and Indigenous Peoples

Xamax respects the right of individuals who may practice customary law and also respects the right to protect traditional knowledge, intellectual property and cultural heritage.

Land, Forest and Water Rights and Forced Eviction

Xamax believes that the sustainable production and conversion of products should not come at the cost of forced eviction and/or the deprivation of land, forest and water rights of local communities. Xamax is committed to upholding the human rights of communities impacted by our supply chains, and to avoid

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any practices that result in forced eviction or the loss of land, forest, and water resources. We recognize the critical importance of these resources to the well-being and livelihoods of local communities.

Child Labor and Young Workers

Xamax refuses to employ children in their facilities. Xamax complies with all local child labor laws and only employs workers who meet the minimum legal age requirement for their location. Per global standards, Xamax does not employ workers under the age of 18. Xamax requires proof of age during recruiting and hiring process to confirm compliance with ILO Convention 138 and local law. Xamax is strictly against the worst forms of of Child Labor as outlined in IDL Convention 182 which comprises of:

- a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
- (b) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- (c) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- (d) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

XAMAX refuses to work with any suppliers who engage in child labor or modern slavery in any form.

Wages & Benefits and Recruitment Fees

Xamax compensates workers for overtime in accordance with applicable local & national laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits. Xamax provides workers with a wage statement that includes adequate information to verify compensation for work performed for each pay period. The use of temporary, outsourced labor is in accordance with applicable local laws and regulations. While Xamax does not typically utilize recruiters, if recruiters are used, Xamax claims responsibility for all fees associated with the recruiting service.

Working Hours

Xamax complies with all applicable local laws regulating working and resting hours and maximum consecutive days of work.

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Forced labor/Labor or Compulsory work/ Human Trafficking

Xamax does not allow forced and / or compulsory labor. Xamax does not authorize forced and / or compulsory labor in any of its facilities. All work must be voluntary, and workers must be free to leave work with reasonable notice. No personal property, documents, or affects shall ever be withheld from a worker. Xamax strictly prohibits any human trafficking: forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, and slavery or trafficking of persons and performs due diligence to ensure it is not active in any part of their supply chain.

Freedom of Association and Collective Bargaining

Xamax allows and respects employees' rights to engage in freedom of association. Individuals have the right to join or form a union without interference. Xamax shall not discriminate against employees based on their membership or non-membership in a union or worker organization. Collective bargaining is the process in which employees negotiate contracts and conditions such as hours or salary and more.

Health & Safety

Health & Safety related information such as emergency procedures and potential safety hazards are available to all workers, posted within the facility and workers are adequately trained on the Xamax Health & Safety policies. Xamax complies with health and safety laws and regulations. Personal protective equipment is made easily accessible. Emergency exits as well as fire detection, alarm and suppression systems are always in place and operational. Fire and evacuation drills are performed according to the law. Xamax abides by a machine-safeguarding program including adequate training for workers. Xamax complies with any/all reporting requirements.

Compliance with Anticorruption Laws and XAMAX Policies:

Xamax complies with all applicable national and/or local laws and regulations and Xamax policies. Xamax must comply with applicable laws of the country where they operate and must comply with the United States Foreign Corrupt Practices Act and other applicable country-specific bribery and money laundering laws. Xamax complies with all applicable anti-corruption laws, including the FCPA and strictly prohibits any form of bribery, kickbacks, or improper payments in exchange for business advantage.

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Responsible Sourcing of Materials

XAMAX supply chain is committed to performing due diligence to understand the source of the raw materials used in their products. XAMAX shall not knowingly provide products containing raw material that contribute to human right abuses, bribery, and ethics violations, or negatively impact the environment.

Confidentiality/ Privacy /Data protection/ Intellectual Property

XAMAX complies with privacy and information security laws and regulatory requirements in addition to the contracted terms & conditions. XAMAX respects the privacy of customers and interested parties and protects personal data against loss and unauthorized access or use, including confidential, Intellectual property, and/or personal information.

Financial Responsibility/Accurate Records

XAMAX is committed to accurately record, maintain, and report business documentation including, but not limited to, financial accounts, quality reports, time records, expense reports, and submissions to customer or regulatory authorities, when appropriate. Books and records are maintained in accordance with applicable laws and accounting practices.

Fair Competition/Anti-Trust

XAMAX conducts business in a fair manner in accordance with all applicable laws and regulations relating to anti-trust or anti-competition.

Conflicts of Interest

XAMAX is committed to avoiding conflicts of interest and managing them appropriately and transparently should they arise.

Counterfeit parts/Integrity

XAMAX is dedicated to conducting business in an honest and ethical manner, with a commitment to transparency and fairness. This means being truthful in our dealings with customers, suppliers, employees, and other stakeholders, and avoiding any form of deception, fraud, or misrepresentation.

Export Controls and Economic Sanction

XAMAX maintains appropriate policies and procedures to ensure compliance with applicable export/import controls and economic sanction laws and regulations of all relevant countries.

Whistleblower Protection:

XAMAX upholds a safe reporting program to ensure the protection of worker whistleblower confidentiality and prohibit retaliation against workers who participate in such programs in good faith or refuse an order that is in violation of the **Code of Conduct**.

Human Rights & Modern Slavery Risk Analysis

We believe it is part of our due diligence to examine potential and actual negative risks to human rights and impacts of our business activities on people along the supply and value chain in an appropriate way. Thus, we analyze the relevant human rights issues and those potentially affected by our business and supply chain. We have systematically included human rights and modern slavery issues in our Risk and Supplier Management & Supplier Qualification. The analysis of risks and effects is reviewed every year as warranted as well as any time a new supplier is being qualified.

Furthermore, we use the results as the basis for compiling and, where necessary, adapting internal regulation processes and training courses in order to meet the changing requirements.

Measures

The aim is to improve the situation of (potentially) affected individuals. For that purpose, we have established standardized processes. Our Supplier Qualification Process (including Code of Conduct, Modern Slavery and Workforce Ethics - Risk Assessment Survey, Supplier Quality & Qualification Questionnaire) and subsequent audits and reviews. These documents oblige all our relevant direct business partners to comply with national and international laws and regulations, as well as with the ILO's core labor standards, to respect human rights and modern slavery laws, and to appropriately address risks to their own business partners and interested parties.

Complaints Mechanisms

Complaint management is an essential part of our due diligence processes to effectively prevent and remedy potential modern slavery and/or human rights impacts caused by our company and/or business activities. We have set up complaints management systems which are accessible inside and/or outside the company. Internal reports are routed through Human Resources and external reporting tool can be found on our website and/or submitted to qualitydept@xamax.com. This tool enables any party to report any potential violations of human rights, modern slavery laws and international agreements. Reports can also be made anonymously. Any indication and justifiable suspicion of human rights or modern slavery violations are dealt with in a transparent process.

We respect the confidentiality and, on request, the anonymity, of whistleblowers. We make sure that whistleblowers are protected against discrimination and penalties related to their complaints

Our Suppliers

Xamax Industries' **Supplier Code of Conduct** outlines our expectations for suppliers with regard to human rights and ethics, employment and non-discrimination practices, diversity and inclusion and health, safety & environmental compliance. As outlined in the **Supplier Code of Conduct**, we expect our suppliers to conduct their operations in a non-discriminatory manner, and in full compliance with applicable laws and governing UN guidelines.

Xamax Industries Inc. believes creating safe places to conduct business is essential to our employees, our customers, our company and our brand. That is why we take concrete action to protect our employees and the communities and people we serve.

Xamax Industries. Inc proudly embraces Environmental, Social & Governance (ESG) Initiatives & Compliance.