

Environmental, Social, and Governance (ESG) Master Policy

This document establishes the Environmental, Social, and Governance (ESG) policies and commitments of Xamax Industries, Inc. (also referred to as “the company” below). The intent of this policy is to provide a comprehensive framework for responsible business conduct, sustainability performance, regulatory compliance, and ethical governance. These policies apply to all employees, management, contractors, and suppliers.

1. Scope and Applicability

- This policy applies to all business operations, manufacturing facilities, employees, and contractors. This document serves as a master list of ESG-related policies. Additional long-version policies may exist in tandem with this document.
- It also applies to suppliers, business partners and interested parties, where applicable.

2. Governance Structure

- The executive leadership team maintains oversight of ESG strategy and performance.
- XAMAX Senior management & Quality Manager are responsible for implementing ESG policies and ensuring compliance with legal requirements.
- An internal management review of ESG performance should occur annually.

3. Environmental Policy

- The company commits to minimizing environmental impact across all operations.
- Objectives include reducing energy consumption, lowering greenhouse gas emissions, minimizing waste, and promoting responsible use of natural resources.
- Compliance with all applicable environmental regulations is mandatory.
- XAMAX Environmental Policy long-version: [QC-FM-013 Xamax Environmental Policy rev2.pdf](#)
- XAMAX participates and complies with a wide scope of regulatory reporting (REACH, RoHS, Prop65, Non-Conflict Materials Declaration (CMRT) & Sustainability Declaration via the New European Deforestation Regulation (EUDR).

4. Energy and Climate Management

- The company will track and monitor energy consumption including electricity and fuel usage.
- Where practical, the company will pursue initiatives to reduce greenhouse gas emissions and improve energy efficiency.
- Energy performance will be reviewed as part of operational management review.

5. Waste Management and Resource Efficiency

- The company will implement waste reduction programs including recycling and responsible disposal practices.
- Hazardous materials must be handled according to regulatory requirements and SDS data will be on hand for all production materials.
- Manufacturing processes should be continually evaluated to improve material efficiency.

6. Responsible Sourcing and Supply Chain

- Suppliers are expected to comply with applicable labor laws, environmental regulations, and ethical business practices.
- New Suppliers/potential Suppliers must fill out the ESG Survey. Existing Suppliers must sign “Xamax Supplier Code of Conduct” or produce their own document that covers the same content of: [QC-FM-010 Xamax Supplier Code of Conduct.pdf](#)
- Supplier sustainability practices may be evaluated as part of vendor qualification.
- The company encourages suppliers to adopt responsible environmental and labor standards. Suppliers shall look for methods to improve energy efficiency in an effort to minimize their energy consumption and greenhouse gas emissions throughout their value chain.

7. Labor and Human Rights

- The company prohibits forced labor, child labor, and discrimination.
- Employees will be treated humanely, with dignity and respect.
- Employment practices will comply with applicable labor laws and regulations.
- XAMAX and its suppliers shall not use any form of forced, bonded, indentured, trafficked, slave or prison labor, with the exception of government approved programs that utilize convicts or prisoners on parole, supervised release or on probation or in any penal or reformatory institution. Child labor is strictly prohibited, and all parties must comply with the minimum age for employment in their country or jurisdiction of operations. XAMAX and its suppliers may be asked to complete the compliance surveys as it relates to regulatory practices.

8. Health and Safety

- The company is committed to maintaining a safe workplace in accordance with OSHA requirements.
- Employees will receive appropriate safety training per Xamax Health & Safety Manual:



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- All incidents and near misses should be reported and investigated.
- Chemicals, waste, and other materials posing a hazard to humans or the environment shall be identified, labeled and managed to ensure their safe handling, movement, storage, use, recycling, reuse or disposal in accordance with applicable regulations.
- Emergency Preparedness: Potential emergency situations and events leading to business interruptions or causing harm to employees are identified, assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills. XAMAX additionally utilizes Risk Management Matrix and Business Continuity Plan to mitigate risk and/or plan for disaster relief on various tiers.

9. Diversity, Equity, Inclusion & Working Hours & Wages

- The company promotes equal opportunity employment and has various policies on ADA, Pregnant Workers, Anti-Harassment, Sexual Harassment & Workplace Violence Prevention Training as well as Complaint Procedures.
- XAMAX shall pay all workers at least the minimum wage and benefits required by applicable laws and regulations. Workers shall be compensated for overtime hours at the premium rate required by applicable laws and regulations. Suppliers should comply with all applicable local laws regulating working and resting hours and maximum consecutive days of work. XAMAX employs practices that verify age and ability to work legally. Workers may not be unlawfully discriminated against under applicable laws & regulations, and the workplace must be free from harassment, coercive and exploitative conduct or abusive behavior.
- Diversity, Equity and Inclusion long-version policies are recorded in the “Xamax Employee Manual”. In lieu of posting entire Employee Manual, for specific policy, please request.

10. Ethics and Anti-Corruption

- The company maintains a strict prohibition against bribery, corruption, and unethical business conduct.
- Employees must avoid conflicts of interest and comply with all applicable anti-corruption laws.
- Xamax ensures compliance with applicable export controls and economic sanction laws and regulations of all relevant countries.
- **QC-FM-009 Xamax Statement on Human Rights and Workforce Ethics: [QC-FM-009 Xamax Human Rights Statement-Rev1.pdf](#)**

11. Data Privacy and Confidentiality

- Confidential company and customer information must be protected.
- Employees must comply with applicable data privacy and cybersecurity practices. All employees must partake in mandatory cybersecurity training.
- Confidentiality and Intellectual Property: XAMAX and all Suppliers/Contractors and their representatives are expected to maintain the confidentiality of information entrusted to them. XAMAX must protect intellectual property rights and maintain the confidentiality of trade secrets/other proprietary information. This clause extends the same onus to all interested parties upstream and downstream in supply chain.
- Confidentiality agreements are available for use with interested parties.
- Standards of fair business, advertising and competition shall be upheld.

12. Reporting and Compliance

- Employees are encouraged to report concerns regarding unethical behavior, environmental issues, or safety risks without fear of retaliation.
- Compliance violations may result in disciplinary action.
- To report a possible violation of the *Xamax ESG Master Policy* or if you are a Supplier of XAMAX and believe there is a possible violation occurring onsite at your facility, please contact: qualitydept@xamax.com

13. Continuous Improvement

- XAMAX Industries, Inc. will periodically review ESG policies and performance metrics to identify opportunities for improvement. XAMAX will conduct these reviews in concert with their ISO 9001:2015 surveillance audits.

14. Approval and Implementation

- Company Name: Xamax Industries Inc.
- Approved/Implemented by: Sarah Morgan
- Title: Quality & Compliance Manager
- Effective Date: March 13, 2026
- Review Frequency: *Annual*
- Executive Approval: Margaret Pederson, President/CEO