

O'Neil Electric Supply Limited - Statement with Respect to Child & Forced Labour.

Child and forced labor are serious global issues that require the attention of all businesses. As a responsible employer and purchaser of goods and services, O'Neil Electric Supply Limited is dedicated to addressing and eliminating these unethical practices. The following principles have been established to uphold our core value of treating every individual with dignity and respect:

- O'Neil Electric Supply Limited strictly prohibits the use of child or forced labor in any of its global operations and facilities.
- We will not tolerate the exploitation of children, their involvement in hazardous work, or the physical punishment, abuse, or involuntary servitude of any worker.
- We expect our suppliers and contractors to adhere to these same standards. If O'Neil Electric Supply Limited becomes aware of any violations of these principles that are not promptly corrected, we will terminate the business relationship.
- For the purposes of these principles, a "child" is defined as anyone under the age of 15.
- O'Neil Electric Supply Limited supports temporary internships, apprenticeship programs for younger individuals, and customary seasonal employment, provided that such work is closely supervised and does not compromise the individual's morals, safety, health, or compulsory education.

It is the responsibility of local management to enforce and ensure compliance with these principles at all O'Neil Electric Supply Limited facilities worldwide. O'Neil Electric Supply Limited Sourcing is responsible for ensuring global compliance with these principles by all suppliers and contractors. The following guidelines are provided to assist in implementing these responsibilities:

O'Neil Electric Supply Limited Guidelines on Child Labor

What is a "child"?

For purposes of these Principles, O'Neil Electric Supply Limited defines a "child" as anyone who is less than 15 years of age.

What if a particular country defines “child” as younger than 15?

Notwithstanding any national law or local regulation that permits a worker to be less than 15 years of age, for purposes of these Principles, O’Neil Electric Supply Limited defines such a person as a “child.”

What if a particular country defines “child” as older than 15?

At sites and in locations where a national or local law or regulation provides for a minimum employment age greater than 15 years or imposes additional restrictions in activities such as hazardous work, such laws and regulations must be observed.

What do O’Neil Electric Supply Limited global operations and facilities include?

It includes the O’Neil Electric Supply Limited Company, its worldwide subsidiaries and joint ventures.

What if the employment concerns hazardous work?

In the case of hazardous work, any person under the age of 18 must not be employed.

What is “hazardous work”?

In determining work that is unsuitably dangerous for persons under the age of 18, consideration should be given to:

1. Work which exposes them to the possibility of physical, psychological or sexual abuse;
2. Work underground, under water, at dangerous heights or in confined spaces;
3. Work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads;
4. Work in an unhealthy environment which may, for example, expose them to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health;
5. Work under particularly difficult conditions such as work for long hours or during the night or work where they are unreasonably confined to the premises of the employer.

Can you elaborate on temporary employment for younger persons?

In accordance with our Principles, younger persons, as described above, may be employed under certain conditions. This employment should be documented and reviewed annually by local management under the following guidelines:

1. The employment is a temporary internship, apprenticeship, or is a seasonal common and customary practice in the industry;
2. The employment does not interfere with compulsory schooling;
3. The young person is working with the permission of his or her parent or legal guardian;
4. The employment does not violate any pertinent labor law or regulation;
5. The employment will be directly supervised;
6. The young person's safety, health and morals will be a primary concern.

What is a "younger person"?

For the limited purpose of internships and apprenticeship education programs, and for customary seasonal employment, a "younger person" is someone under the age of 15.

What is "customary seasonal employment"?

Customary seasonal employment is work traditionally performed by younger persons that is legal, does not conflict with schooling and is of short duration. Examples of customary seasonal employment include mowing lawns, shoveling snow, etc.

Is it necessary to document temporary employment of younger persons?

Yes. Local management is responsible for maintaining appropriate records to document that any such employment is consistent with our Principles and Guidelines. These records should be retained for at least one year after the cessation of employment. After this they are subject to the policies of the pertinent records retention program.

Who is responsible for verifying a worker's age?

It is the responsibility of local management and each supplier to verify the age of an applicant for any particular type of employment.

What is the best way to verify a worker's age?

Commonly accepted proofs of age include, but are not limited to, the following: a government-issued birth certificate with raised seal; a record of birth maintained in connection with religious practices, that is contemporary with the birth and shows the date of the birth event; or an official passport showing the age of the child when such record has been in existence for at least a year.

O'Neil Electric Supply Limited Guidelines on Forced Labor

What is "Forced Labor"?

Forced labor is any and all work or service which is exacted from any person under the menace of any penalty for its non-performance and for which the worker does not offer him-, or herself voluntarily. Providing wages or other compensation to a worker does not necessarily indicate that that labor is not forced or compulsory.

What is O'Neil Electric Supply Limited's internal commitment on the issue of Forced Labor?

O'Neil Electric Supply Limited, together with its worldwide subsidiaries, affiliates, joint ventures or other associated entities, will not use Forced Labor in any of its operations anywhere in the world. This commitment also extends to the use of any factory or sub-vendors who make or assemble O'Neil Electric Supply Limited products.

What is O'Neil Electric Supply Limited's external commitment on the issue of Forced Labor?

O'Neil Electric Supply Limited will not purchase, rent, lease, borrow or otherwise use any products, goods, services or raw materials anywhere in the world made or provided by a supplier who knowingly uses forced or involuntary prison labor.

Can you give us some examples of what Forced Labor is and what it is not?

Forced Labor takes many insidious forms. Examples of Forced Labor include but are not limited to:

- Otherwise legal child or young person labor where the child or young person has no choice about whether to work or not;
- The work or service of prisoners if they are hired out or placed at the disposal of private individuals, companies or associations involuntarily and without supervision of public authorities;

- Involuntary labor for development purposes required by the authorities, including assistance in construction, agriculture and other public works;
- Work required in order to punish opinion or expression of views ideologically opposed to the established political, social or economic system; and
- Bonding workers through debt.

Forced Labor does not include:

- Compulsory military service for persons over the age of 15 of a purely military character;
- Normal civic obligations such as jury duty;
- The work or service of prisoners resulting from a conviction in a court of law which is carried out under the supervision and control of a public authority;
- Work performed in emergency situations such as fire, flood, famine, earthquake, epidemic, or other circumstance that would endanger the well-being of the community as a whole;
- Minor communal services performed in the direct interest of the community; or
- Mandatory (sometimes called “forced”) overtime that is understood to be part of the job description and that complies with pertinent laws and regulations.

Guidelines for our Partners [Vendors, Contractors and Suppliers]

What are we asking of our Partners?

O’Neil Electric Supply Limited, together with its worldwide subsidiaries and joint ventures, requires that all of its global vendors, contractors, and suppliers of any product or raw material, wherever it originates, apply its Human Trafficking, Child Labor and Forced Labor Principles.

How will this be carried out?

All current and future goods or services supply contracts will be modified to contain the following clause:

Child Labor and Forced Labor Prohibition

OUR PARTNERS hereby certifies that it is fully aware of the prohibition regarding the employment of children under 15 years of age pursuant to the O’Neil Electric Supply Limited Child Labor Principles and on the prohibition on use of involuntary labor, human trafficked or slave labor pursuant to the O’Neil Electric Supply Limited Forced Labor Principles (hereinafter referred to collectively as “O’Neil Electric Supply Limited Principles”).

OUR PARTNERS certifies that it does not currently employ, and will not in the future employ, directly or indirectly, or through any subcontractor, any child to perform work for O'Neil Electric Supply Limited who is under 15 years of age, or 18 years of age in the case of hazardous work, in any of its operations or activities in a manner contravening O'Neil Electric Supply Limited Principles or in violation of relevant laws and regulations. [Contractor] certifies that it, and its suppliers of goods and services, will not utilize persons under the age of 15, or 18 years of age for hazardous work, in contravention of the O'Neil Electric Supply Limited Principles or in violation of relevant laws and regulations.

OUR PARTNERS certifies that the workers it uses, and will use, to produce and supply the goods and services offered are in all cases present voluntarily. [Contractor] certifies that it and its suppliers of goods and services will not knowingly utilize prison, slave, human trafficked or forced labor as it is defined in the O'Neil Electric Supply Limited Principles.

OUR PARTNERS understands that these certifications and undertakings are essential to this contract. [Contractor] agrees to indemnify O'Neil Electric Supply Limited and hold O'Neil Electric Supply Limited harmless with respect to any violation of relevant laws and regulations, or for any civil liability arising from the contravention of the O'Neil Electric Supply Limited Principles by [Contractor] or any of its suppliers of goods or services. [Contractor] also agrees that, in the event that O'Neil Electric Supply Limited determines that a violation or contravention of relevant laws or regulations or the O'Neil Electric Supply Limited Principles has occurred, O'Neil Electric Supply Limited shall notify [Contractor] and [Contractor] shall immediately remedy the violation or contravention. In the event that O'Neil Electric Supply Limited determines that [Contractor] has not remedied the violation or contravention and complied with the law and/or the O'Neil Electric Supply Limited Principles, then O'Neil Electric Supply Limited may terminate this contract immediately, and such termination shall be with cause.

Sincerely,



Michael S O'Neil
C.E.O. - O'Neil Electric Supply Limited

Policy on Forced Labor and Child Labor Risks

1. Purpose

The purpose of this policy is to address and eradicate the risks of forced labor and child labor within the supply chains of businesses and government institutions doing business in Canada. This policy reflects our commitment to ethical sourcing and our responsibility to ensure that exploitative practices are not tolerated in our operations and supply chains.

2. Scope

This policy applies to all entities and government institutions doing business in Canada, including all employees, suppliers, contractors, and business partners involved in the supply chain.

3. Policy Statement

Entities and government institutions doing business in Canada have a responsibility to ensure that their supply chains are free from forced labor and child labor. This includes goods imported into and distributed within Canada.

4. Definitions

- **Forced Labor:** Work that is performed involuntarily and under the threat of any penalty.
- **Child Labor:** Work that deprives children of their childhood, potential, dignity, and that is harmful to physical and mental development. This includes work that interferes with schooling.

5. Responsibilities

- **Entities and Government Institutions:** Ensure compliance with this policy by conducting due diligence on supply chains to identify, address, and eradicate forced labor and child labor.

- **Suppliers and Contractors:** Adhere to this policy and implement measures to ensure that their operations and supply chains are free from forced labor and child labor.
- **Employees:** Report any concerns related to forced labor and child labor in the supply chain to management.

6. Due Diligence

Entities and government institutions must conduct regular risk assessments of their supply chains to:

- Identify suppliers and regions at higher risk of forced labor and child labor.
- Implement measures to mitigate identified risks.
- Monitor and verify compliance with ethical sourcing standards.

7. Reporting and Accountability

- **Reporting Mechanisms:** Establish confidential reporting mechanisms for employees, suppliers, and other stakeholders to report concerns related to forced labor and child labor.
- **Accountability:** Ensure that any supplier or contractor found to be in violation of this policy takes immediate corrective action. Failure to comply may result in termination of contracts or business relationships.

8. Training and Awareness

Provide training and resources to employees and suppliers to raise awareness about the risks of forced labor and child labor and to ensure understanding and compliance with this policy.

9. Monitoring and Review

- Conduct regular audits and reviews of supply chain practices to ensure ongoing compliance with this policy.
- Review and update this policy periodically to reflect changes in laws, regulations, and industry standards.

10. Commitment to Ethical Sourcing

Entities and government institutions are committed to ethical sourcing and will actively work to ensure that their supply chains are free from forced labor and child labor, upholding the highest standards of human rights and labor practices.

11. Contact Information

For questions or concerns related to this policy, please contact:

A handwritten signature in blue ink, appearing to read "Michael S O'Neil", with a long horizontal flourish extending to the right.

Michael S O'Neil
C.E.O. - O'Neil Electric Supply Limited
416-798-7722

Ethical Sourcing Policy

Introduction

O'Neil Electric Supply Limited aims to provide its customers with quality products and value for money. In today's global market, this means sourcing products from a variety of locations nationally and internationally.

In recent years, concerns over poor working conditions and environmental degradation in developing countries and emerging markets have seen companies implement specific social and environmental criteria for the production facilities from which they source products.

In order to address these concerns, O'Neil Electric Supply Limited is introducing its Ethical Sourcing Policy to ensure it is:

- sourcing its products in a responsible manner,
- working with its suppliers to improve their social and environmental practices,
- providing clear guidance to its buying staff, and
- protecting its corporate reputation, the reputation of its individual businesses and their brands.

Our Commitment

O'Neil Electric Supply Limited is committed to upholding human rights, fair working conditions and environmental protection.

In accordance with the expectations of our customers, the community, and the requirements of the Law, we endeavor to always operate responsibly within the community, and we expect the same from our suppliers.

Maintaining a reputation for the highest legal, moral and ethical standards in our dealings with our customers and other key stakeholders is critical for our ongoing success. The Policy has been developed to complement our core values of integrity, trust and acting responsibly.

We are committed to working with our suppliers to help improve their labour and environmental practices.

Expectations

We expect our suppliers to support the ethical standards set out in this Policy with regard to workplace safety, environment, and fair pay and employment conditions.

The Policy sets out the standards that we expect all of our suppliers to comply with when producing and supplying products for O'Neil Electric Supply Limited, no matter where they operate in the world. We recognize that full compliance with these criteria may take time for some suppliers, and we are committed to working with our suppliers to implement improvement plans and help them achieve compliance.

Our suppliers must commit to complying with the following requirements, many of which are drawn from the Ethical Trading Initiative (ETI) and International Labour Organization (ILO) Conventions.

These requirements represent minimum standards based on the principles of the United Nations Universal Declaration of Human Rights.

Ethical Sourcing Policy

1. Fair working conditions

Our suppliers are required to ensure fair working conditions. This includes:

- Giving employees the right to rest and recuperate and providing them with fair compensation and benefits.
- Prohibiting discrimination relating to, but not limited to, race, color, gender, sexual orientation, religion, political affiliation, trade union membership, disability, nationality, social origin or age.
- Respecting the rights of employees to freedom of assembly and association.
- Demonstrating zero tolerance for forced labor based on the following three principles:

2. Plant and process safety

The design and operation of our suppliers' production plants and manufacturing processes must be safe for their employees, the public and the surrounding communities. Risk assessments must be carried out for all production facilities. Processes that may lead to serious incidents must be identified, and their hazards and risks must be thoroughly analyzed. Adequate corrective actions must be taken to minimize identified risks. This also includes the handling, storage and transportation of materials, which must be conducted in a manner that is safe for human health & safety and the environment

3. Bribery and Corruption

- Suppliers shall not engage in acts of bribery and corruption and shall not falsify documents and records

4. Labour Rights

- Employment is freely chosen
There is no forced, bonded or involuntary prison labour
- Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice as required by territorial standards

5. Freedom of association and the right to collective bargaining are respected

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively
- The employer adopts an open attitude towards the activities of trade unions and their organizational activities
- Worker's representatives are not discriminated against and have access to carry out their representative functions in the workplace
- Where the right to freedom of association and collective bargaining is restricted under Law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining

6. Working Conditions

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health in the working environment
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers
- Access to clean toilet facilities and to clean and drinkable water and, if appropriate, sanitary facilities for food storage shall be provided
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers
- Suppliers will ensure that personal protective equipment is available, and workers are trained in its use. Safeguards on machinery must meet or exceed local laws
- Suppliers shall assign responsibility for health and safety to a senior management representative

7. Child Labour

- O'Neil Electric Supply Limited supports ILO Convention 138 about the appropriate age of workers and will not work with suppliers who use child labour.
- Child labour refers to work that:
 - Is mentally, physically, or morally harmful to children;
 - Can negatively affect their mental, physical, or social development, and
 - Interferes with their schooling:
 - by depriving them of the opportunity to attend school;

- by obliging them to leave school prematurely; or
- by requiring them to attempt to combine school attendance with excessively long and heavy work.

In short: child labour is work that deprives children of their childhood, their potential and their dignity and is harmful to their physical and mental development.

8. Living Wages

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid
- Deductions from wages as a disciplinary measure or any deductions from wages not provided for by Law shall not occur without the expressed permission of the worker concerned. All disciplinary measures should be recorded

9. Working Hours

- Working hours comply with any Law and benchmark industry standards, whichever affords greater protection
- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7-day period on average. Overtime shall be voluntary, shall not be excessive, shall not be demanded on a regular basis and shall always be compensated at a overtime pay applicable under territorial law

10. Discrimination

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation

11. Regular Employment

- To every extent possible work performed must be based on recognized employment relationship established through national law and practice

- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided using labour only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment

12. Harsh or Inhumane Treatment

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited

13. Entitlement to Work and Immigration

- Only workers with a legal right to work shall be employed or used by the supplier
- All workers, including employment agency staff must be validated by the supplier for their legal right to work by reviewing original documentation
- The supplier shall implement processes to enable adequate control over agencies with regards to the above points and related legislation

14. Sub-Contracting and Home Working

- There shall be no sub-contracting unless previously agreed with O'Neil Electric Supply Limited
- Suppliers must have adequate processes in place for properly managing sub-contracting and home working to ensure sub-contractors do not abuse, exploit or provide unsafe working conditions for their employees

15. Environment Compliance and Impact Reduction

Henkel is committed to reducing its environmental footprint in areas such as energy, waste and water as well as driving progress toward a circular economy. We expect our suppliers to support us in achieving our goals and to set themselves targets that are as ambitious as our own.

- The facility shall comply with national and local environmental laws and regulations
- The facility shall dispose of its production waste in accordance with local environmental laws and regulations
- The facility must have identified and documented its key environmental impacts and implemented controls to minimize its impact on the environment with

respect to solid waste disposal, hazardous chemicals storage and management,
air and water emissions

Compliance with the Policy

O'Neil Electric Supply Limited expects its suppliers to comply with all aspects of this Policy and will be extending its coverage of audited facilities and compliance monitoring processes to include these standards. O'Neil Electric Supply Limited is committed to working in partnership with its suppliers to help achieve compliance with this Policy. In the event where any supplier is unwilling or unable to demonstrate continuous improvement towards full compliance with our standards, the trading agreement between O'Neil Electric Supply Limited and the supplier will be terminated.

Sincerely,

A handwritten signature in blue ink, appearing to read "M S O'Neil", with a long horizontal flourish extending to the right.

Michael S O'Neil
C.E.O. - O'Neil Electric Supply Limited
416-798-7722

29 May 2024