

# **NWR Group of Companies**

# Statement of Forced, Child and Indentured Labor

# 1. Introduction

At North West Rubber Ltd. (NWR), we are deeply committed to ethical sourcing practices and ensuring the dignity and rights of workers throughout our supply chain. This comprehensive policy on forced labor outlines our firm stance against any form of forced or compulsory labor within our operations or those of our suppliers. This document serves as a guideline to ensure compliance with our values and legal obligations.

# 2. Compliance with Applicable Laws and Regulations

Suppliers are expected to, as a minimum, adhere to all relevant local, national, and international laws and regulations pertaining to forced labor. This includes but is not limited to laws concerning human trafficking, slavery, and involuntary servitude. In jurisdictions where the law may not be well defined international laws will prevail. Suppliers will be expected to maintain full compliance in this area.

# 3. Voluntary Employment

All forms of forced labor, including bonded labor and involuntary prison labor, are strictly prohibited within our supply chain. Suppliers must ensure that all employment relationships are entered into voluntarily and that workers are free to leave their employment upon reasonable notice without any threat of penalty or reprisal.

#### 4. Child Labor

The use of child labor is strictly forbidden within the NWR supply chain. We insist on strict adherence to laws and regulations regarding the minimum age of employment. Suppliers must verify the age of their workers and maintain accurate records to ensure compliance.

# 5. Compensation

Workers within our supply chain must receive fair and timely compensation for their labor. Suppliers are expected to pay wages that meet or exceed the legally mandated minimum wage, ensuring that workers can afford a decent standard of living for themselves and their families. Deductions from wages should be lawful and transparent, and no portion of a worker's pay should be withheld as a form of coercion.

#### 6. Hours of Work

Suppliers must ensure that working hours comply with applicable laws and industry standards. Workers should not be required to work excessively long hours and must be provided with adequate rest periods and breaks in accordance with local regulations. Overtime work, if necessary, should be voluntary and compensated at a premium rate.

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# 7. Health and Safety

The health and safety of workers are paramount. Suppliers must provide a safe and healthy working environment, free from hazards and risks to physical and mental well-being. This includes implementing appropriate safety measures, providing necessary training, and ensuring access to medical care and emergency assistance.

#### 8. Environmental Responsibility

While this policy primarily focuses on labor practices, we also expect our suppliers to uphold environmentally sustainable practices. Suppliers should minimize their environmental impact, comply with relevant environmental laws and regulations, and strive to implement eco-friendly initiatives wherever feasible.

#### 9. Suppliers' Monitoring of their Suppliers

Suppliers are expected to extend the principles outlined in this policy to their own supply chain. They must monitor and ensure that their own suppliers, subcontractors, and business partners also comply with these standards. This includes conducting regular assessments, audits, and due diligence to identify and address any potential risks of forced labor within their supply chain.

#### **10. Monitoring and Enforcement**

We will conduct regular audits and assessments of our suppliers' facilities to monitor compliance with this policy. Suppliers found to be in violation will be subject to corrective action, up to and including termination of contracts. We encourage transparency, self reporting, and cooperation in addressing any issues that may arise.

#### 11. Training and Awareness

Our supply chain and procurement teams are trained annually on this statement. Suppliers must provide training and awareness programs for their employees regarding their rights and responsibilities under this policy, including the prohibition of forced labor, health and safety guidelines, environmental practices, and compliance with trade laws and sanctions.

#### 12. Conclusion

North West Rubber Ltd. is unwavering in its commitment to upholding ethical standards and safeguarding the rights and well-being of workers throughout our supply chain. We expect our suppliers to share in this commitment and actively work towards creating a fair, safe, and respectful work environment for all. Together, we can build a sustainable future founded on integrity and human dignity.

This policy is effective immediately and applies to all current and future suppliers of North West Rubber Ltd Group of Companies.

Leighton Friesen President & Chief Executive Officer

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