

## Company Summary

The Carlstar Group ULC is a global producer of original equipment and aftermarket replacement specialty tires and wheels for agriculture, ATV/UTV, all-terrain, construction, industry, lawn and garden, power sports, recreation, and towable trailers.

On February 29, 2024, the Carlstar Group LLC (US Operation) and the Carlstar Group ULC were acquired by Titan International, a leading global manufacturer of off-highway wheels, tires, assemblies, and undercarriage products. The combination of the Carlstar Group and Titan International will create one of the largest manufacturers of specialty tires and wheels globally, covering both commercial and consumer markets.

The Carlstar Group and Titan International are committed to upholding the highest ethical standards in their supply chain practices. Neither The Carlstar Group nor Titan International source materials from the Uyghur region or any other areas associated with forced labor. As a trusted CTPAT partner, The Carlstar Group adheres strictly to all forced labor reporting requirements and has comprehensive policies in place to ensure compliance. Similarly, Titan International maintains rigorous policies to prevent forced labor within its supply chain. Both companies are dedicated to ethical sourcing and take every necessary step to ensure that their products are manufactured under fair and humane conditions.

All policies and procedures listed in this report for the Carlstar Group LLC (US operations) are applicable to The Carlstar Group ULC (Canada operations).

### Canada Operations:

The Carlstar Group ULC conducts distribution center operations in Canada at the following business locations:

#### The Carlstar Group –Waterloo

645 McMurray Road

Waterloo, Ontario N2V 2B7

#### The Carlstar Group – Edmonton

1320 149 Street Northwest Unit 115

Edmonton, AB T5V 0B7

CSG Calendar Year 2023		
	China to Canada Direct Volume	Chinese products from US to Canada
Customs Entries	326	261
Customs Entered Value	\$41,071,548.72 CAD	\$4,960,721.69 CAD
Exporters	23	13 (includes intercompany entries)
Ports of Entry	10	18
Transport - Air	5	0
Transport - Highway	4	226
Transport - Marine	317	0
Transport - Rail	0	35

## Map Cargo Flow, Identify Partners and Processes

Partner	Process	Cargo Movement- if applicable	Transport Mode	Know Details About Provider	Days Cargo is "At Rest" at this stage
Carlisle (Meizhou) Rubber Manufacturing Co., Ltd.	Export documents	N/A	N/A	Yanyang Town, Meixian, Meizhou City, Guangdong Province, 514759 P.R. China	N/A
Carlisle (Meizhou) Rubber Manufacturing Co., Ltd.	Load, Transport	Loading in CN, sealing (security seals), transport to the seaport	Truck	Yanyang Town, Meixian, Meizhou City, Guangdong Province, 514759 P.R. China	0
Blue Anchor Line	Transport, handling at the seaports, handover to the customs warehouses	Unloading at the seaport - immediate handover to the customs warehouse, issuing transit documents and consignment notes	Truck	Kuehne & Nagel Ltd., Guangzhou Branch 20-21/F Center Plaza North Tower, 159 Linhexi Road, Tianhe District, Guangzhou, 510620, P.R. China	2
Blue Anchor Line	Warehouse	Await customs entry processing and release	N/A	Kuehne & Nagel Ltd., Guangzhou Branch 20-21/F Center Plaza North Tower, 159 Linhexi Road, Tianhe District, Guangzhou, 510620, P.R. China	1
Blue Anchor Line	Transport, handling at the seaports, handover to the customs warehouses	Loading onto the vessel	Truck	Kuehne & Nagel Ltd., Guangzhou Branch 20-21/F Center Plaza North Tower, 159 Linhexi Road, Tianhe District, Guangzhou, 510620, P.R. China	2
MSC Canada Inc.	Sea Transport, collection from seaport	Sea transport from origin to destination, unloading from vessel, Picked up from seaport and transported to warehouse to await customs clearance	Sea	7 Saint-Jacques West, Montreal, QC H2Y 1K9, Canada	0
Halterm Ltd.	Warehouse	Await customs entry processing and release	N/A	Pier C, Terminal Road, Halifax, NS B3J 2X1, Canada	1
Russel A. Farrow Customs Brokers	Customs Broker	Processing of Customs Entry while at Warehouse	N/A	220 Ave. Reverchon, Suite 244, Dorval, QC H9P 2S7, Canada	0
Kuehne & Nagel Ltd.	Final Delivery	Transport from warehouse to destination once customs released	Truck	221-B McIntyre Drive, Kitchener, ON N2R 1G1, Canada	0
The Carlstar Group ULC	Destination	Final delivery locaiton	Carlstar Facility	645 McMurray Road, Waterloo, ON N2V 2B7, Canada	0



# The Carlstar Group

Policy # CSG - HR #645

## Global Human Rights Policy

At The Carlstar Group, we recognize the respect for human rights is fundamental to our values, operations, employees and relationships with partners and stakeholders. As a responsible corporate citizen, we are committed to upholding and promoting human rights in all aspects of our business. This Global Human Rights Policy outlines our principles and commitments to ensure protection and advancement of human right across our organization and supply chain.

### 1. Respect

- a. We respect the inherent dignity and rights of all individuals, regardless of their race, color, ethnicity, gender, sexual orientation, religion, disability, age, nationality, or any other characteristic.
- b. We will not tolerate discrimination, harassment, or any form of abuse toward our employees, customers, suppliers or any other parties we engage with.

### 2. Labor Rights

- a. We uphold the right of freedom of association and collective bargaining for our employees, in compliance with local laws and regulations.
- b. We provide a safe, both physically and physiologically, and healthy work environment our employees, promoting their well-being and safeguarding against any form of exploitation or forced labor.

### 3. Child Labor

- a. We strictly adhere to international and national laws regarding child labor, and we do not employ anyone below the legal working age in the country of operation.

### 4. Fair Wages and Benefits

- a. We ensure that all employees are provided with fair wages and benefits that comply with applicable laws and industry standards, enabling them to meet their basic needs and improve their living standards.

### 5. Supply Chain Responsibility

- a. We expect our suppliers and business partners to comply with the human rights principles and values consistent with our own.



## The Carlstar Group

- b. We work collaboratively with our suppliers to address any human rights risk in the supply chain and implement corrective actions when necessary.
6. Community Engagement
  - a. We engage with local communities in a transparent and respectful manner, taking into account their human rights concerns and seeking ways to contribute positively to their development.
7. Human Rights Due Diligence
  - a. We conduct regular assessments to identify, prevent, and address any potential human rights risks within our organization and supply chain.
  - b. We take prompt action to remedy any adverse human rights impacts resulting from our activity.
8. Reporting and Communication
  - a. We are committed to transparently communicating our human rights efforts, progress and challenges both internally and externally.
  - b. We encourage stakeholders to provide feedback, observations, concerns and suggestions related to our human rights practices, and provide numerous ways to report anonymously.
9. Non-Retaliation
  - a. We guarantee protection to individuals who raise concerns or report potential human rights violations in good faith. We do not tolerate any form of retaliation against whistleblowers.
10. Continuous Improvement
  - a. We continuously review and improve our Human Rights Policy and practices to align with emerging international standards and best practices.

This Global Human Rights Policy is an integral part of our corporate culture and guides our decision-making processes. All employees and business partners are expected to adhere to these principles, promoting a culture of respect for human rights throughout our operations and beyond.

Jacob Thomas  
CEO  
The Carlstar Group

31 JULY 2023

Date

# The Carlstar Group, LLC

## Forced Labor Remediation Plan

Addressing forced labor in supply chains is a complex and serious issue that expects a comprehensive and multi-faceted remediation plan.

CBP encourages stakeholders in the trade community to closely examine their supply chains to ensure goods imported into the United States are not mined, produced, or manufactured, wholly or in part, with prohibited forms of labor, i.e., slave, convict, indentured, forced, or indentured child labor.

CBP regulations state that any person who has reason to believe that merchandise produced by forced labor is being, or is likely to be, imported into the United States may communicate his belief to any Port Director or the Commissioner of CBP (19 CFR 12.42).

If The Carlstar Group identifies forced labor in our supply chains here is a general outline of steps to be taken to address the issue:

### 1. Immediate Actions:

- Conduct a thorough investigation to verify the existence and extent of forced labor in the supply chains.
- Establish a dedicated task force or committee to handle the remediation efforts and ensure cross-departmental collaboration.
- Reference CBP's Forced Labor Allegation Submission Checklist <https://www.cbp.gov/document/publications/forced-labor-allegation-submission-checklist>
- Reference CBP's [Guidelines for Submission of Forced Labor Supporting Documents](#)
- Report allegations of forced labor via CBP's [eAllegations website](#).

### 2. Engage Stakeholders:

- Reach out to affected workers and labor rights organizations to understand the full scope of the issue and its impact.
- Communicate openly with suppliers to address the issue transparently, encouraging them to collaborate and implement necessary changes.

### 3. Develop a Supplier Code of Conduct:

- Create or update a comprehensive supplier code of conduct that explicitly prohibits the use of forced labor.
- Ensure that suppliers understand and acknowledge the code of conduct and consider making it a contractual expectation.

### 4. Supplier Audits and Assessments:

- Conduct rigorous and independent audits of high-risk suppliers to assess their compliance with the supplier code of conduct.
- Identify root causes of forced labor and other labor violations, and work with suppliers to develop corrective action plans.

5. **Capacity Building and Training:**
  - Provide training to suppliers and their workers on labor rights, ethical recruitment practices, and the consequences of forced labor.
  - Support suppliers in enhancing their capacity to implement responsible labor practices.
  
6. **Remediation and Support:**
  - Develop a remediation plan for suppliers found to be using forced labor, setting clear timelines and milestones for improvement.
  - Offer support and resources to help suppliers make the necessary changes, such as financial incentives or access to training programs.
  
7. **Traceability and Transparency:**
  - Strengthen traceability mechanisms within the supply chain to identify potential risks and ensure transparency.
  - Encourage suppliers to disclose their sub-tier suppliers to address potential hidden risks.
  
8. **Collaboration and Industry Initiatives:**
  - Collaborate with industry peers, non-governmental organizations (NGOs), and relevant stakeholders to share best practices and resources.
  - Participate in industry initiatives focused on eradicating forced labor from supply chains.
  
9. **Reporting and Accountability:**
  - Regularly report on progress and improvements made in supply chain labor practices to stakeholders and the public.
  - Hold suppliers accountable for non-compliance with the code of conduct and remediation plans.
  
10. **Continuous Improvement:**
  - Recognize that this is an ongoing process and commit to continuous improvement in supply chain labor practices.
  - Regularly review and update the remediation plan based on feedback and changing circumstances.

# The Carlstar Group, LLC

## Supplier Code of Conduct

### OVERVIEW

This Carlstar Group, LLC Supplier Code of Conduct (this “Code”) helps to ensure that The Carlstar Group, LLC, Marastar, and subsidiaries does business with suppliers that share The Carlstar Group, LLC commitment to ethical and sustainability standards and business practices. People and companies (“suppliers”) that supply goods and/or services to The Carlstar Group, LLC or any of its subsidiaries or affiliates (“CSG”) must comply with the principles set out in this Code, as may be amended by CSG from time to time.

### CODE OF CONDUCT

#### 1. General Principles

Suppliers must operate in full compliance both with all applicable local laws and regulations at a minimum. Where local laws are less stringent than our policies, including the standards set out in this Code, we expect our suppliers to apply the more stringent standards. Suppliers must also comply with all other CSG policies that apply to their operations, including, as applicable.

#### 2. Human Rights

CSG is committed to respecting internationally recognized human rights in line with relevant standards including the UN Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights (UDHR), the International Labour Organization’s (ILO) various conventions and expects its suppliers to respect all aspects of human rights. Suppliers must comply with all applicable labor and human rights laws, regulations, and standards, including, but not limited to:

- Compliance with all laws and regulations regarding human rights in their countries and/or regions of operation.
- Compliance with applicable wage and hour labor laws, including those related to minimum wage, overtime, and legally mandated benefits.
- No unlawful discrimination or harassment in the workplace including on the basis of gender, nationality, race or any other characteristic protected by law, and compliance with applicable laws concerning discrimination, hiring and employment practices.
- No use of forced or involuntary labor, including, but not limited to, prison labor, indentured labor, slave labor, human trafficking, or other forms of compulsory labor. Suppliers must avoid the following practices: restricting worker movement, isolating workers, intimidating or threatening workers, allowing abusive

working and living conditions, retaining identity documents, withholding wages, allowing excessive or involuntary overtime and charging recruitment fees (either directly, or indirectly through business partner activities).

- Recognition of and respect for the freedom of association of workers to join organizations of their choosing or to likewise refrain from joining such organizations. This includes the rights of workers to collectively bargain through representatives of their choosing where a union has been established/chosen in accordance with applicable local law.

### **3. Health and Safety**

CSG believes that health and safety management and disaster preventions are of critical importance for securing sustainable and stable benefits for all stakeholders.

Suppliers must provide a safe and healthy work environment. This includes identifying, evaluating, and controlling worker exposure to safety and health hazards, providing personal protective equipment, conducting mandatory training on hazards and emergency procedures in a language workers can understand and anticipating and planning for emergencies, for example by conducting fire and other emergency evacuation drills.

### **4. Environment**

Suppliers must comply with applicable environmental laws in the jurisdictions in which they operate. Suppliers are expected to:

- Identify, and minimize or eliminate, the use, in their manufacturing processes and products, of substances restricted under applicable laws and regulations, including hazardous or toxic substances, and ensure full regulatory compliance, including proper management, storage and disposal.
- Be aware of any use of reportable substances in their manufacturing processes and products, and actively investigate suitable substitutes; and
- Obtain all necessary environmental permits or similar consents and comply with all conditions.

### **5. Conflict Minerals**

CSG supports ending the violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region,” which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. As a result, the U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules expect manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products.

The definition of “conflict minerals” refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed, or sold. The U.S. Secretary of State may designate other minerals in the future. We support these requirements to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and in surrounding countries, which has been partially financed by the exploitation and trade of “conflict minerals”.

Suppliers must comply with all laws and regulations and are expected to assess risks of conflict minerals across the whole supply chain using Conflict Minerals Reporting Template (CMRT).



## 6. Business Ethics

CSG is proud of the values with which we conduct business and are committed to conducting all aspects of our business in keeping with the highest legal and ethical standards. In addition to compliance with applicable laws, CSG always expects its suppliers to adhere to high standards of integrity, and to conduct themselves in a manner that will help protect our good name in the marketplace. These expectations include, but are not limited to, the following:

### Gifts, Gratuities and Entertainment

CSG personnel must conduct their activities in full compliance with the company's Ethics, Confidentiality and Business Conduct policy, the laws of the United States and all applicable anti-corruption laws, including the UK Bribery Act, the United States Foreign Corrupt Practices Act (FCPA) and the Criminal and Anti-Unfair Competition Laws of the People's Republic of China.

Suppliers should be aware that:

- Gifts, gratuities, entertainment, or other personal incentives are unnecessary in the context of obtaining or retaining CSG's business.
- Excessive gifts, gratuities, entertainment, or other personal incentives are contrary to good business practices, are detrimental to the interests of our stakeholders, customers and associates and violate both CSG policy and this Code of Conduct.

In general, suppliers should refrain from providing gifts to CSG associates. Gifts of cash or cash equivalents, such as gift cards or gift certificates, are absolutely prohibited. A gift of nominal value (less than \$75 USD or its equivalent) is not prohibited, as long as it:

- Is customary and would not appear extravagant, improper, or inappropriate to the recipient or an objective observer.
- Is not linked to any business decision by CSG and imposes no sense of obligation on the giver or recipient.
- Does not result in any special or favored treatment between the giver and recipient.
- Complies with any additional specific limits established by CSG.
- Does not otherwise violate the internal policy of the giver or recipient.
- Is otherwise in accordance with the CSG Ethics, Confidentiality and Business Conduct policy.

Entertainment, such as meals and, if infrequent, events, that are business-related and occur under appropriate circumstances for the conduct of business may also be permitted, provided they comply with the requirements listed above and, in addition, are attended by supplier and held at a venue appropriate for business discussions.

### Anti-Corruption/Anti-Bribery

Suppliers must comply with all applicable laws regarding bribery and corruption, including, but not limited to, the U.S. Foreign Corrupt Practices Act and UK Bribery Act, and CSG's Anti-Corruption Policy. Suppliers must never offer or pay any money or anything of value to a government official or any other person for the purpose of obtaining or retaining business, gaining favorable treatment, or for any other improper purpose. This includes a prohibition on facilitating or "grease" payments intended to expedite or secure performance of a routine governmental action. Suppliers must maintain a written accounting of all payments (including any gifts, meals, entertainment, or anything else of value) made in connection with work done for CSG and must provide a copy of this accounting to CSG upon request.

## **Competition Laws**

Suppliers must conduct their business in accordance with all applicable competition and antitrust laws.

## **Conflicts of Interest**

CSG associates are expected to act in the best interest of CSG. Accordingly, suppliers must avoid any relationship with a CSG associate that might conflict, or appear to conflict, with the associate's obligation to act in the best interest of CSG. For example, suppliers must not employ or otherwise retain CSG associates, and must ensure that any gifts and entertainment provided to CSG associates comply with CSG requirements. If a supplier employee or contractor is a family relation (spouse/partner, parent, sibling, child, grandchild) or shares a household with a CSG associate, the supplier must disclose this fact to CSG.

## **Reporting and protection against retaliation**

Suppliers must provide a complaint reporting mechanism, including for anonymous reporting, for supplier workers to report workplace grievances or other compliance concerns, in accordance with local laws and regulations. Suppliers must maintain reporter confidentiality and prohibit retaliation against workers who report matters in good faith.

## **7. Privacy and data protection**

Suppliers must maintain the confidentiality of information entrusted to them by CSG. Suppliers must comply with applicable privacy and information security laws and CSG policies and must implement appropriate measures to protect confidential information and personal data against loss and unauthorized access or use.

## **COMPLIANCE VERIFICATION**

CSG may, from time to time, request information or access for purposes of verifying suppliers' compliance with this Code. In the event CSG provides such a request and is not reasonably satisfied with a supplier's response, CSG may, take the actions described under "Violations" below.

## **APPLICATION TO EMPLOYEES, AGENTS, SUBCONTRACTORS AND OTHERS**

Suppliers must ensure that any person who performs services for them or on their behalf in any capacity, including employees, agents and representatives, complies with this Code. This Code also applies to each supplier's subcontractors and sub suppliers for work that is directly related to CSG, and each supplier must ensure such subcontractors and sub suppliers comply with the provisions of this Code as if they were the supplier itself.

## **VIOLATIONS**

Suppliers must promptly take necessary corrective actions to remedy any noncompliance with this Code. In the event of any noncompliance, or in the event a supplier is unwilling or unable to comply with this Code, CSG reserves the right, in its sole discretion, to decline to make further purchases under any agreement between CSG and the supplier, terminate any such agreements and/or terminate its business relationship with the supplier, in addition to exercising any other available remedies.

## **NON-COMPLIANCE REPORTING**

### **Who at CSG would be the contact?**

Violations of this Code and/or other questions or concerns regarding compliance and ethics issues may be confidentially reported, including anonymously, through The Carlstar Ethics Point Hotline at [www.carlstar.ethicspoint.com](http://www.carlstar.ethicspoint.com). In the United States and Canada, you can call toll-free: 1-844-286-0067.

China: 400-888-0764

Europe: 068-002-1136

Effective Date – 07/26/2023

POC:

Teena Mathis. LCB, CCS

Global Trade Compliance Manager

The Carlstar Group, Franklin TN

Email: [TCD@carlstargroup.com](mailto:TCD@carlstargroup.com)

	<b>SECTION:</b> <b>SUBJECT:</b> <b>ISSUE DATE:</b>	<b>GLOBAL POLICIES</b> <b>LABOR MANAGEMENT POLICY</b> <b>MARCH 2, 2021</b>
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**TITAN INTERNATIONAL, INC.**

**Labor Management Policy**

Titan International, Inc. (Titan) is a company with over a century of history. Our firm is being so successful and resilient due to our respect to our employees’ rights and thoughts. Titan operates in 16 countries, in five continents, with complete wheel and tire assemblies for off-highway vehicles marketed and sold worldwide.

Titan understands that our lasting success is inherently tied to our values of providing dependable products to our consumers, treating every employee with respect and dignity and investing in our workforce to maintain the quality of our products and services. Titan is committed to respecting global labor rights and supports labor practices as outlined by the United Nations Global Compact and the International Labor Organization (ILO) Core Labor Standards.

**Freedom of Association and Collective Bargaining**

We respect our employees’ right and freedom to associate and no Titan employee will be subject to discrimination, harassment, intimidation, or retaliation due to a membership in a lawful workers’ association or union. To promote and enforce these rights, Titan relies on the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights.

**Forced Labor**

The use of forced labor is prohibited in all our sites and contracts and Titan is committed to cease involvement with any party that allows such practice. We believe that every employee has the right to move freely, should not have to pay for a job or become indebted to their employer. Titan does not tolerate the practice of withholding workers’ passports, original identification documents or other valuables unless explicitly required by law. Moreover, we expect that fees and costs associated with recruitment and employment should be paid by the employer, not the employee. Titan will not work with any supplier or contractor known to operate with forced labor.

**Child Labor**

Titan will not, under any circumstance, hire, engage professionally or knowingly employ anyone younger than sixteen (16) years of age. The Company will not work with any supplier or contractors known as a child labor abuser and will notify the relevant authorities if this practice is identified anywhere in the Company’s operations. The Company will establish procedures to monitor and identify abuses among supplier or contractors in the future, with the goal of terminating professional relationship if abuses are identified.

**Health & Safety**

Our employees’ health, safety and wellbeing are priorities in our operations. Titan will comply with all occupational health and safety regulations and will establish procedures to monitor and encourage compliance among partners and suppliers in the future, in line with our health and safety standards consistent with ours. More information is available in our [website](#).

**Harassment & Discrimination**

 The logo for Titan, featuring a stylized 'T' inside a circle with a red-to-blue gradient, followed by the word 'TITAN' in a bold, blue, serif font.	<b>SECTION:</b> <b>SUBJECT:</b> <b>ISSUE DATE:</b>	<b>GLOBAL POLICIES</b> <b>LABOR MANAGEMENT POLICY</b> <b>MARCH 2, 2021</b>
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Titan prohibits sexual harassment or any form of harassment of our employees by any person in the workplace or while conducting company business. Titan also prohibits discrimination based on race, ethnicity, color, gender, pregnancy, sexual orientation, gender identity, age, religion, creed, national origin, disability, legally protected leave or veteran status, political opinion, and other categories protected by applicable law.