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| Title: | Forced Labor Policy | | |
| Department: | HR/Corporate | Document No: | ECC-POL-COR-007 Rev 0 |
| Author: | Santosh Prabha | Approval Date: | May 03 rd , 2024 |
| Approved by: | Zulf Karim | Effective Date: | May 17 th , 2024 |

1.0 Purpose

Eccomelt recognizes that forced labor or modern slavery, in all its forms, is a violation of fundamental human rights. Eccomelt is committed to preventing modern slavery within its operations and supply chain. This policy outlines the steps Eccomelt takes to identify, mitigate, and prevent modern slavery.

2.0 Scope

This policy applies to all employees, contractors, suppliers, and business partners of Eccomelt.

3.0 Framework & Policies

Eccomelt has a governance framework in place that provides the management team with mechanisms to review and report on forced labor. The policies & procedures below cover the framework Eccomelt uses to reducing its risks associated with forced labor or modern slavery.

- 3.1 Code of Conduct** – Governance framework that sets expectations for how we conduct business, treat coworkers, employees, and business partners.
- 3.2 Equal Opportunity and Human Rights** – Commitment towards abiding with international human rights principles, ensuring that fair treatment is given to everyone irrespective of race, gender, ethnicity, and other characteristics.
- 3.3 Bribery, Fraud and Corruption** – Commitment to conduct business in accordance with all applicable laws, rules and regulations including those relating to bribery, fraud, and corruption.
- 3.4 Responsible Sourcing** – Ensuring suppliers meet our expectations in helping us achieve our environmental, social and governance targets.
- 3.5 Grievance Mechanism** – Ensuring that concerns or complaints that may arise are promptly addressed and solutions are effective.

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4.0 Risk Assessment

At Eccomelt, we understand that the various types of risks we face in our operations could inadvertently cause, contribute to or be directly linked to modern slavery. As part of our efforts to address this issue, we have identified the following risk areas to monitor and assess regularly.

| Risk | Source | Description | Risk Rating |
|------|-----------------------------------|---|-------------|
| 1 | Contract workers directly engaged | Eccomelt employees are 100% permanent. | Low |
| 2 | Workers under the age of 18 | Eccomelt does not have any workforce under the age of 18 nor do we hire workers under the age of 18. | Low |
| 3 | Temporary Workers | Eccomelt has a number of temporary workers legally employed under temporary work visas through agencies. Eccomelt commits to auditing and reviewing these agencies to be consistent with our fair treatment and human rights policies. | Medium |
| 4 | Seasonal Workers | Eccomelt has no seasonal workers working at its locations. Eccomelt employment processes do not require any form of deposit, Recruitment Fees, Costs or Charges from Workers, either directly employed or employed through recruitment agencies. | Low |
| 5 | Freedom of Association | Eccomelt recognizes the principle of freedom of association and the right to join employee organizations. Our policies and procedures do not restrict our employees from forming an association or joining an organization. | Low |
| 6 | Wheel Suppliers | Eccomelt's suppliers are evaluated and monitored for their performance including any environmental, social and governance impacts they may have that could inadvertently cause, contribute to or be directly linked to modern slavery. | Low |
| 7 | Certifications | Eccomelt is audited to Quality standard ISO 9001, but is not currently audited by a third party for ISO 14001 or ISO 45001. | Medium |
| 8 | Other services directly engaged | Eccomelt relies on external services for recruitment, legal, cleaning services, equipment maintenance and waste disposal. All these services are sourced from agencies based in the United States and Canada where they operate as per local and federal regulations, but require our regular evaluation. | Medium |

5.0 Supply Chain

At Eccomelt, we are dedicated to the principles of sustainable development and minimizing our impact on the environment in all our business activities. Our commitment towards sustainability means showing responsibility towards Environmental, Social and Governance impacts in all aspects of our operations, including our supply chain. When evaluating a supplier, criteria such

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as ‘Reputation’ and ‘Location’ are considered. Suppliers with poor reputation and located in areas or regions that carry environmental and social risks shall be deemed as high-risk suppliers for Eccomelt.

6.0 Reporting and Whistleblowing

Eccomelt has a grievance mechanism to handle requests from all our stakeholders.

For further information refer to “**ECC-POL-COR-006 Rev 0 Complaints Resolution Procedure**”.

7.0 Review and Monitoring

This policy shall be periodically reviewed to meet minimum ASI minimum requirements and identify opportunities for improvement.

8.0 References

- 8.1 ECC-POL-COR-001 Eccomelt Code of Conduct
- 8.2 ECC-POL-COR-002 Eccomelt Sustainability and Environmental Policy
- 8.3 ECC-POL-COR-003 Eccomelt Bribery, Fraud and Corruption Response Plan
- 8.4 ECC-POL-COR-004 Eccomelt Supplier Sustainability Policy
- 8.5 ECC-POL-COR-006 Complaints Resolution Procedure
- 8.6 QMF-00-10-009 Recommendation Form

9.0 Revision & Approval

| Rev Level | Change | Date | Initiator |
|-----------|--|------------|----------------|
| 0 | Initial Release titled as ‘ Forced Labor Policy ’ with Document number ECC-POL-COR-007 | 05/03/2024 | Santosh Prabha |
| 0 | Reviewed and approved | 05/03/2024 | Zulf Karim |