	PURCHASING POLICY		
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1.0 SCOPE

Essex Weld Solutions unconditionally prohibits and condemns all forms of forced labour or modern slavery including trafficking in persons, slavery, servitude, forced marriage, debt bondage, forced labour, deceptive recruiting for labour or services and child labour. Essex Weld Solutions has a zero-tolerance approach to all forms of forced labour or modern slavery within its operations and supply chains. Essex Weld Solutions is committed to acting ethically and with integrity in all its business interactions and relationships.

This policy outlines Essex Weld Solution’s commitment to complying with ethical business practices by ensuring all individuals working on behalf of Essex Weld Solutions are aware of Essex Weld Solutions’ commitment to the prevention, detection and reporting of modern slavery in any part of Essex Weld Solutions operations and supply chains.

2.0 RESPONSIBILITIES

Management – All management members are responsible for the review, communication and training related to this policy for all internal team members.


Purchasing Department – All members of the procurement department are responsible to communicate Essex Weld Solutions commitment to this policy to their current and future supply chain.

Employees- All employees have the responsibility to report any concerns regarding modern slavery or forced labour with the Human Resource team and participate in any investigation as required.

3.0 PROCEDURE

Essex Weld Solutions has a zero-tolerance attitude and approach to modern slavery and will make every effort to promote awareness within our workforce and our supply chain of the risks relating to modern slavery. We are committed to acting ethically and with integrity in all business dealings and relationships. We expect that our employees will comply with this policy and uphold our values at all times and any breaches of our policy will be subject to investigation and potential disciplinary action.

We expect that our customers, suppliers and contractors match and reflect our dedication to preventing the existence of modern slavery within our supply chain and that they comply with all applicable legislation and regulations in relation to workplace rights and labour laws. Any breaches of our supplier agreements arising under this policy will be referred to Senior Management for investigation.

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All suppliers shall:

- Comply with applicable Canadian, US and international laws that prohibit forced labour.
- Uphold the human rights of workers and treat them with dignity and respect.
- Ensure all work is voluntary and workers are free to terminate their employment.
- Ensure that workers are not required to pay any recruitment fees or other fees for their employment.
- Employ workers on the basis of their ability to do the job.
- Ensure all workers meet the applicable minimum legal age requirement.
- Set work hours, wages and overtime pay in compliance with all applicable legislation.
- Pay workers at least the minimum legal wage and comply with legally mandated benefits.

All Suppliers shall not:

- Unreasonably restrict workers' freedom of movement in the company facilities.
- Hold or otherwise destroy, conceal, confiscate, or deny access by workers to their identity or immigration documents such as government-issued identification, passports or work permits.
- Use recruiters or staffing agencies that do not comply with applicable labour laws, or charge workers any recruitment fees.
- Engage in or permit corporal punishment, threats of violence, mental or physical coercion, verbal abuse of workers or other forms of harassment whether based on gender, race, color, religion, ethnicity, age, sexual orientation, national origin, disability or any other legally protected characteristic.
- Use child labour. A child means any person under the age of 15, or under the age for completing compulsory education.
- Discriminate on the basis of any and all protected grounds under the human rights.

All employees, managers and directors of the company will be expected to provide their full cooperation in any investigation related to this policy.

Should an issue be identified at a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period. We reserve the right to terminate our relationship with individuals and organizations in our supply chain if they breach this policy.

4.0 Communication

To ensure all employees are aware of the modern slavery and forced labour policy it will be made available in the Human Resource policy drive for review at any time.

All suppliers will be made aware of this policy through our supplier code of conduct being highlighted on our website and referenced on our purchase orders offering a link to the supplier code of conduct found on our website. As highlighted above, this provides all suppliers of Essex Weld Solutions LTD and our company stand against forced labour and modern slavery practices.

All members of the Procurement Team will review and sign the policy stating their understanding of the expectation.

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AMENDMENTS

AMENDMENT	AREA SPECIFIC	Approval and Date
1.0	Initial Release	D. Krahn 02/21/23
1.1	Removal of Internal disciplinary actions in Sec. 3 Addition of paragraph 2 in Sec. 4.0	R. Vermeulen 05/24/24