

FORCED LABOR AND HUMAN TRAFFICKING POLICY

Bolshaw Industrial Powders strictly prohibits the use of forced labor and human trafficking in all company operations and in our supply chain.

According to the ILO Forced Labor Convention, 1930 (No. 29), forced or compulsory labor is all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

Principles:

- Bolshaw Industrial Powders strictly prohibits the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.
- 2. Bolshaw Industrial Powders does not impose unreasonable restrictions on workers' freedom of movement. All workers are allowed to leave company premises at the end of their shifts.
- 3. As part of the hiring process, Bolshaw Industrial Powders provides workers with a written employment contract that contains a description of terms and conditions of employment. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment after reasonable notice.
- 4. Bolshaw Industrial Powders does not hold or conceal, confiscate or deny access by employees to employees' identity documents, such as government issued identification, passports, immigration or work permits, unless the holding of work permits is required by law.
- 5. Workers shall not be required to pay employers or agent's recruitment fees or other aggregate fees.

Implementation

All actions to avoid forced labor and human trafficking shall be implemented by taking the employees' best interests into account. Bolshaw Industrial Powders complies with all applicable national and international laws, regulations and provisions, and takes all appropriate measures to ensure that no forced labor and human trafficking occurs at our places of production and in our supply chain.

Date and Signature of the CEO Mr Jonathan Bolshaw | 3.1.24