



March 2025

Responsible Recruitment Policy

Larsen & Shaw is Committed to Fair and Responsible Recruitment Principles.

Scope

Our Company takes responsibility to uphold fair and responsible recruitment principles and practices that respect, protect and fulfil internationally recognized human rights, including those expressed in international labor standards, particularly the right to freedom, non employment of child labour, forced labour, modern slavery and human trafficking, and are dedicated to the prevention and elimination of forced labor, child labor and discrimination, in all steps of the recruitment and employment processes.

Larsen & Shaw recognizes that recruitment responds to labor market needs. Recruitment is qualifications-based and does not displace an existing work force, lower labor standards, wages or working conditions; or undermine decent work. This policy applies to all employment, whether through direct employment, contracted employment services or agencies, contractors or suppliers.

All employees and stakeholders require compliance to employment standards, applicable laws and regulations. The company has an obligation to protect workers throughout the recruitment and employment process. Larsen & Shaw will be transparent to all stakeholders throughout the recruitment and employment process of all employees.

The company will use adequate and verifiable mechanisms for age and eligibility verification upon recruitment and will maintain accurate and up-to-date records of all employees.

Employee Rights

Employees own and control their personal documents and contracts. Employees will own original documents, the employer upon request will obtain copies but will not keep original documents. Direct employees of the company will enter into an employment agreement which will be electronic or written and signed by a representative of the company and by the employee.

The company has established decent working hours for all employees allowing for a balance of work and home life. Larsen & Shaw follows the Ontario Employment Standards Act. No employee will work more than 60 hours in 1 week, including overtime. Employees will receive 11 consecutive hours off work each day and must receive at least eight hours off between shifts. An employee must not work for more than five hours in a row without receiving a 30-minute unpaid, eating period (meal break) free from work.

Employees have the right to the grievance and dispute resolution processes as well as appropriate remediation. Our Company considers this Policy critical to preventing labor issues that tend to originate in the recruitment process. Workers, including migrant workers are exposed to risks of exploitation from their country of origin, prior to employment in our factory. Migrant workers may be vulnerable to deceptive or fraudulent recruitment practices that may not always be visible to the Company; however it is the Company who stands to lose the most from the impacts on our brands, reputation, customers, and business viability, of irresponsible and illegal recruitment practices by any stakeholder in our supply chain. Therefore, through this Policy and its implementation, our Company is committed to conducting due diligence to encourage continuous improvement of the responsible recruitment practices.

It is our belief that through Responsible Recruitment strategies, our Company could help reduce, mitigate, and/or eliminate the risks of exploitation and abuse for job-seekers and hired workers during the recruitment process, thus enabling all persons access to decent work and income, in a protective and supportive environment, that could allow them to achieve their full potential.

Larsen & Shaw believes that employment is a basic right and nobody of any kind should have to pay money to be employed. We ensure that that all employment opportunities with Larsen & Shaw are available freely and based on the merit of candidates. Larsen & Shaw does not accept payment or benefits either in cash or in any kind for employment opportunities and will endure all costs associated with recruitment of an employee. In any situation where there may be an exception to the policy, the company will reimburse the cost to the employee within 30 days of receipt.

Zero Tolerance

Our Company takes a strong stand against all forms, manifestations, indications and evidence of corruption, extortion and embezzlement, inhumane treatment related to child labour, human trafficking; forced, bonded, slave, indentured, involuntary compulsory labor; discrimination on the basis of gender, race, religion, ethnicity, sexual orientation, disability and others; the right to freedom of association and collective bargaining as well as any practices that could compromise the lives, health, safety and dignity of job-seekers and workers.

Our Company consider such acts as non-negotiable, unethical and illegal and will take action against perpetrators.

Applicability

Employees of Larsen & Shaw will not engage in, encourage, support or excuse directly or indirectly any violations of the fundamental human rights and rights of workers as defined in the above mentioned paragraphs and the International Labour Organization.

Our Company Will NOT:

- 1) Do business with any individual or organization, especially labor recruiters and recruitment agencies, which have been implicated, suspected, charged or proven beyond doubt to have violated fundamental human rights and rights of workers; in its operations or supply chain.
- 2) Purchase material or services from suppliers, subcontractors, service providers, brokers, agents, including recruiters, that may be/have been involved with the above mentioned unethical and illegal acts.

- 3) Use force as punishment or disciplinary measure for workers expressing their views or associating with other workers, nor as a means of gender, racial, religious or other discrimination.
- 4) Engage in and support any violation of our recruitment policies at anytime, at work or during personal non-work hours.

Compliance

Larsen & Shaw expects all stakeholders, owners, shareholders, managers and employees to abide by the strictest standards. Similarly, our Company expects all external stakeholders-suppliers, subcontractors, brokers, agents, especially recruitment agencies; institutional or community enterprises to comply with our Company Policy and position on fair and responsible Recruitment. The company will ensure that all stakeholders, owners, shareholders, managers and employees receive training and are required to sign off and accept the companies Responsible Recruitment policy and Supplier Code of Conduct.

Stakeholders will maintain high standards of transparency and accountability in their actions. Responsibilities to comply and address potential inequalities in recognition of the vulnerability of certain groups of stakeholders, such as migrant workers, women and their children, pregnant women, disabled persons, and other groups subject to potential discrimination and unequal treatment.

If the company becomes aware of a violation of the policy of child labour, forced labour, modern slavery and trafficked employees, immediate action will be taken against the company and individual in violation. Larsen & Shaw will contact the authorities, NGO and regulatory agency and will also take measures to ensure that children who are victims of child labour are reunited with their guardians in their country of origin and sponsor the minor to receive education until the completion of school. The Company will ensure that victims of forced labour, modern slavery and trafficked employees are supported through rehabilitation and the company will remain in contact with the NGO to monitor the wellbeing of the individual. The company may also provide support to the worker until they receive a viable job.

The Company will maintain legal requirements under Canadian and International Standards and Legislation to legally operate a business in Walkerton Ontario. Larsen and Shaw is a member in good standing of the Province of Ontario and has been in operation since 1919. The company maintains Federal, Provincial and Municipal laws, licences and permits. Larsen & Shaw follows Employment Standards and the Occupational Health and Safety Act and is committed to creating a safe and healthy work environment.

Compliance of this Policy will be guided by our Company Values, Guiding Principles, Supplier Code of Conduct, and Employee Handbook. Larsen & Shaw is committed to helping to raise awareness, increase prevention, enable recognition, confidential reporting and whistleblower protection, provide grievance channels and remediation options, monitor and verify that all of these strategies are systematically addressing potential inequalities as well as facilitating efforts to implement a Responsible Recruitment Policy that can reduce, minimize, prevent labor risks to all stakeholders, including vulnerable workers.

This policy takes effect from the date of signing.

Regards,



Jenn Spitzig
Human Resources Manager
Larsen & Shaw Limited
575 Durham Street West
Walkerton, Ontario
N0G 2V0
www.larsenhinge.com

Name

Date