

Human Rights Policy

1. Purpose

SECURE Waste Infrastructure Corp. ("SECURE") affirms its commitment to conducting business in a manner that upholds and promotes the protection of human rights. Our approach is guided by internationally recognized human rights principles, including those set forth in the *Universal Declaration of Human Rights*, the *International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work*, and the *United Nations Guiding Principles on Business and Human Rights*, and the *Organization for Economic Cooperation and Development ("OECD") Guidelines for Multinational Enterprises*.

This Policy establishes the overarching principles and expectations that form an integral part of SECURE's governance framework, business operations, and corporate culture. It reflects our responsibility to take all reasonable measures to prevent, mitigate, and address any actual or potential direct or indirect involvement in human rights abuses in supply chains.

SECURE is committed to engaging proactively with employees, suppliers, vendors, and other stakeholders to identify, assess, and eliminate human rights risks and abuses within our operations and throughout our supply chain. This commitment extends to implementing due diligence processes, monitoring compliance, and fostering continuous improvement to ensure the highest standards of ethical conduct.

2. Definitions

Child Labour: Work that deprives children of their childhood, their potential, their dignity, and that is harmful to physical and mental development. It refers to work that:

- Is mentally, physically, socially, or morally dangerous and harmful to children;
- Is provided or offered to be provided by children under circumstances that are contrary to Canadian or local law;
- Interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work; or
- Constitutes the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999.

Forced Labour: All work or services which:

- Is forced from any person under the threat of penalty and for which the person has not offered themselves voluntarily; or
- Is provided or offered to be provided by a person under circumstances that could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide work or services.

Hazardous Child Labour: Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children. This includes the worst forms of Child Labour, which includes children being enslaved, separated from their families, exposed to serious hazards and illnesses, and/or left to fend for themselves on the streets of large cities – often at a very early age.

Human Trafficking: The recruitment, transportation, transfer, harbouring, or receipt of people by means of threat, force, coercion, abduction, fraud, deception, abuse of power, or giving/receiving payments to control a person for the purpose of exploitation. Exploitation can include (but is not limited to):

- Sexual exploitation ;

- **Forced labor** (in factories, agriculture, domestic work, etc.); and
- **Slavery or practices similar to slavery.**

Indentured Labor: Is a system in which a person is bound by a contract (called an *indenture*) to work for a specific employer for a fixed period of time—often several years—without salary but to repay a debt, sometimes incurred through fees charged for passage to another country (common in colonial migration) and/or food, shelter, and basic necessities. Unlike slavery indentured labour typically has a set end date.

Modern Slavery: Situations where workers are being exploited and cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power. It is an umbrella term that includes various forms of serious exploitation of people for personal or commercial gain.

3. Commitments

The commitments included in this Policy provide a framework for ensuring that SECURE's operations and business decisions align with the Policy.

3.1 Ethical Business Conduct

As outlined in SECURE's [Code of Business Conduct](#) and [Supplier Code of Conduct](#), we are committed to upholding the highest ethical standards in all aspects of our business. All business conducted on behalf of SECURE must be compliant with these Codes as well as to all applicable laws, regulations and strive to achieve industry best practices.

3.2 Modern Slavery

No employee, supplier, vendor, contractor, or any other person that performs work on behalf of SECURE will participate or permit human trafficking or use any form of slave, child, forced, bonded, indentured, or prison labour. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

3.3 Child Labour

All employees, suppliers, vendors, contractors, or any other persons that perform work on behalf of SECURE must ensure child labor does not occur at or in SECURE operations or be utilized in goods or services provided to SECURE. All child labour, youth employment or equivalent laws and regulations will be followed in the regions which they operate. If there are no applicable laws or regulations within a jurisdiction, the principles set forth by the [ILO Standards](#) will be followed. Under no circumstances will Child Labour, including Hazardous Child Labour and/or the worst forms of child labour, be permitted.

3.4 Forced Labour

All labor performed for SECURE – whether by employees, suppliers or contractors – must be freely chosen and undertaken without coercion, threat or penalty. In accordance with International Labor Organization conventions and applicable laws, SECURE strictly prohibits all forms of forced, bonded, indentured, or unpaid labor, including prison labor that is not performed voluntarily and with fair compensation.

SECURE will never require deposits, financial guarantees, or the surrender of personal identification documents such as passports or government-issued identification.

All workers have the right to terminate their employment in accordance with legal notice requirements or contractual obligations and wages will be paid in full, accurately and on time.

3.5 Fair Employment Practices

SECURE adheres to all required minimum employment or wage standards within the jurisdictions which it operates, in accordance with relevant laws, regulations, or equivalent.

3.6 Safe Work Places

SECURE supports and encourages diversity and inclusion within our business by maintaining workplaces that are safe, secure, healthy, and free from discrimination, violence, harassment, and bullying. Refer to SECURE's [Workplace Non-Discrimination, Violence, Harassment and Bullying Policy](#) and [Diversity and Inclusion Policy](#) for more specific details. Additionally, SECURE is committed to providing a safe and healthy work environment where employees are both encouraged and entitled to refuse unsafe work without fear of reprisal.

3.7 Freedom of Association and Collective Bargaining

SECURE respects the principles of freedom of association and collective bargaining and is aligned with the ILO and its conventions: [Freedom of Association and Protection of the Right to Organise Convention \(No. 87\)](#) and [Right to Organise and Collective Bargaining Convention \(No. 98\)](#).

4. Supply Chain Diligence & Risk Assessment

SECURE will conduct ongoing risk assessments of its operations and supply chains to identify, assess and mitigate risks related to human rights abuses, particularly in jurisdictions identified as high-risk for modern slavery, forced labour, child labour and human trafficking. This includes engaging with suppliers to verify compliance and requiring corrective action plans where risks are identified.

4.1 Supplier and Contractor Accountability

SECURE expects its suppliers and contractors to be compliant with this Policy and SECURE will periodically conduct audits, inspections or interviews and/or request documentation to assess supplier and contractor compliance. Where human rights violations are identified in SECURE's operations or supply chains, SECURE will take steps to mitigate harm, including working with relevant stakeholders to provide remedy to affected individuals. Where appropriate, SECURE will support suppliers in implementing corrective measures before considering termination of the contract.

5. Transparency and Reporting

In addition to SECURE's reporting requirement under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)*, SECURE will report annually its activities with respect to human rights including risks identified, due diligence activities undertaken and actions taken to address human rights risks in its operations and supply chain. Reports will be posted on SECURE's website (www.secure.ca).

6. Training

SECURE provides human rights training to employees in procurement, supply chain management, and leadership. Training will be completed upon hire or when transitioning into one of these roles. Refresher and update training will be provided as required.

7. Policy Compliance

SECURE maintains an accessible, confidential reporting channel for employees, suppliers, and external stakeholders to report human rights concerns without the fear of retaliation. Reports can be made anonymously and will be investigated promptly as appropriate. Additional details are included in SECURE's [Whistleblower Policy](#).

8. Policy Review

SECURE will review and update this Policy on a regular basis, and at least every two years, to ensure it continues to align with SECURE's strategy and reflects evolving industry practices, laws, and regulations.

9. Policy Owner/Contact

This Policy is owned by the Environment, Social and Governance (ESG) Team. Questions regarding this Policy and requests for exemptions to this Policy should be directed to the Vice President of ESG. The VP ESG is responsible for the periodic review of this Policy and to approve any variances related to this Policy.

10. Reference Material

This Policy references the SECURE Code of Conduct and other related policies. Here is a list of those documents:

[Supplier Code of Conduct](#)

[Code of Business Conduct](#)

[Workplace Non-Discrimination, Violence, Harassment and Bullying Policy](#)

[Diversity and Inclusion Policy](#)

[Whistleblower Policy](#)

Adopted by the Board of Directors on June 12, 2023. Last reviewed and/or amended on October 29, 2025.