

Human Rights Policy

Purpose

SECURE is committed to providing an environment that upholds the protection of human rights for all employees and stakeholders of SECURE and is consistent with international human rights standards. This Human Rights Policy (the “Policy”) outlines the fundamental principles embedded into our business operations and culture to ensure we take measures to eliminate, control, or avoid activities that may result in any direct or indirect complicity in human rights violations.

SECURE is committed to working with our employees, suppliers, vendors, and other stakeholders to strive for the detection and elimination of human rights violations within our operations and supply chain.

Scope

This Policy applies to human rights on any matter or circumstance arising at a workplace, whether it occurs on SECURE premises or in another location where business or work-related activities are conducted, regardless of geographic location. This expectation extends to suppliers, who we expect to share our values and commitment to human rights. These principles are not replacements or substitutes for applicable laws.

Any action by an employee or supplier that violates or might reasonably be expected to lead to or result in a violation of the provisions set forth in this Policy is strictly prohibited and will not be tolerated. Any violations of this Policy will be subject to disciplinary action up to and including termination of employment or employment contracts, termination of supply contracts, and if warranted, further legal action at the sole discretion of SECURE.

SECURE’s approach to human rights is based on:

- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Universal Declaration of Human Rights
- The International Labor Organization’s (“ILO”) 1998 Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises

1. Ethical Business Conduct

- 1.1 As detailed in SECURE’s [Code of Business Conduct](#) and [Supplier Code of Conduct](#) we are committed to promoting high ethical standards in all of our business activities. All business conducted on behalf of SECURE must be compliant with the **Code of Business Conduct**, **Supplier Code of Conduct**, and all applicable laws and regulations.

2. Fair Employment Practices

- 2.1 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.
- 2.2 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. Modern Slavery

- 3.1 No employee, supplier, vendor, contractor, or any other persons that perform work on behalf of SECURE will participate or permit human trafficking or use any form of slave, 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.

4. Child Labour

- 4.1 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. 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, work involving 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 (“**the Worst Forms of Child Labour**”), or work which by its nature or the circumstances in which is it carried out, is likely to harm the health, safety, or morals of children (“**Hazardous Child Labour**”) be permitted.
- 4.2 **Child Labour** as used in this Policy refers to 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:
- (a) Is mentally, physically, socially, or morally dangerous and harmful to children; and/or
 - (b) 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.

5. Forced Labour

- 5.1 All labour, whether it is done by a supplier or contractor, must be done voluntarily and without the threat of punishment or consequences. Labour that is forced, coercive, or unpaid in any form is illegal, including prison labour.
- 5.2 Employees will not be asked or required to make deposits or provide financial guarantees. Furthermore, employee’s identifying credentials (i.e., passports, ID cards, etc.) will not be confiscated by SECURE.
- 5.3 Employees have the right to terminate their employment in accordance with legal notice or employment contracts. There will be no delays in payment of wages. Additionally, SECURE promotes a safe working environment where employees are encouraged and have the right to refuse unsafe work.

6. Freedom of Association and Collective Bargaining

- 6.1 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 \(No. 98\)](#).

7. Training

- 7.1 Employees, vendors, contractors, and suppliers have an obligation to familiarize themselves with this Policy and abide by the principles set out herein.

8. Policy Compliance

- 8.1 Any person with reason to believe that this Policy is not being followed by a SECURE employee or stakeholder is asked to report violations in accordance with the procedures described in SECURE’s [Whistleblower Policy](#).

9. Policy Review

- 9.1 SECURE will review this Policy periodically to ensure it aligns with SECURE’s strategy and supports industry practices, laws, and regulations.

10. Policy Owner/Contact

- 10.1 This Policy is owned by the Environment, Social and Governance (ESG) Committee. 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.

11. Reference Material

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

- (a) [Supplier Code of Conduct](#)
- (b) [Indigenous Relations Policy](#)
- (c) [Code of Business Conduct](#)
- (d) [Workplace Non-Discrimination, Violence, Harassment and Bullying Policy](#)
- (e) [Diversity and Inclusion Policy](#)
- (f) [Whistleblower Policy](#)

Adopted by the Board of Directors on June 12, 2023. Last reviewed and/or amended on May 5, 2023.