

Human Rights Policy

Context & Scope

Context: Sustana produces sustainable, premium recycled fiber and paper. We work with leading brands, corporations, and customers to create environmentally friendly, sustainable solutions for their packaging and printed material needs and utilize post-consumer material to create high-quality, low carbon products. Our facilities, operations, and personnel, as well as the majority of our customers and suppliers, are located in the United States and Canada.

Scope: This policy applies to Sustana and all its subsidiaries, brands, and employees. It applies to all suppliers – hereinafter “Suppliers” – with whom we have a contractual agreement.

Approach and Commitment

Promoting and protecting labor and human rights are critical for achieving the [Sustainable Development Goals \(SDGs\)](#). Sustana aims to support SDG progress and our business is guided by a set of principles focused on human rights. We recognize our responsibility and ability to influence positive social impact through our product design, operations, and procurement and sales decisions, as well as through meaningfully engaging and supporting our employees, suppliers, and customers.

Sustana is signatory to the [United Nations Global Compact](#) (UNGC) and supports its Ten Principles, including those on protecting human rights, eliminating all forms of forced and compulsory labor, abolishing child labor, upholding the freedom of association, recognizing the right to collective bargaining, and eliminating discrimination in respect of employment and occupation. Through a materiality assessment, Sustana engaged a wide range of stakeholders and identified labor as an important area of focus.

Sustana recognizes, and its policies and actions are informed by, the following:

- United Nations (UN) Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights (UNGP)
- UN Declaration on the Rights of Indigenous Peoples
- International Labor Organization (ILO) Declaration of Fundamental Principles and Rights at Work
- ILO Forced Labor Convention, 1930 (No. 29)
- ILO Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)
- ILO Right to Organize and Collective Bargaining Convention, 1949 (No. 98)
- ILO Equal Remuneration Convention, 1951 (No. 100)
- ILO Abolition of Forced Labor Convention, 1957 (No. 105)
- ILO Discrimination (Occupation and Employment) Convention, 1958 (No. 111)
- ILO Minimum Age Convention, 1973 (No. 138)
- ILO Occupational Safety and Health Convention, 1981 (No. 155)
- ILO Indigenous and Tribal Peoples Convention, 1989 (No. 169),
- ILO Worst Forms of Child Labor Convention, 1999 (No. 182)
- ILO Indicators of Forced Labor

- Organization for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises and Due Diligence Guidance on Responsible Business Conduct
- Impact Operational Procedures for Remediation of Child Labor in Industrial Contexts
- UN Convention (1951) and Protocol (1967) relating to the Status of Refugees
- UN Transforming Our World: the 2030 Agenda for Sustainable Development and its 17 Sustainable Development Goals (SDGs) and related targets

Sustana's organizational values with respect to human rights are espoused in the following documents:

- Sustainability Strategy
- CEO's Commitment Statement to the United Nations Global Compact (UNGC)
- Modern Slavery Statement
- Sustainable Procurement Policy
- Anti-Corruption and Whistleblower Policy
- Diversity, Equity, and Inclusion Policy
- Employee Health and Safety Policy
- Employee Code of Conduct
- Supplier Code of Conduct

Policy Elements

Adherence to Laws: Sustana's owned operations commit to, at a minimum, follow local legal requirements in the jurisdictions in which they operate. The same requirement applies for Sustana Suppliers.

Child Labor: Sustana will not tolerate the exploitation of children or the use of child labor in any of Sustana's facilities or Suppliers worldwide. Effective age verification systems must be in place to prevent the employment of children, and effective remediation is required if children are inadvertently employed, with this remediation always keeping in mind the best interests of the child.

Forced Labor: Sustana is committed to preventing, and reducing the risk of, forced labor being utilized in our facilities or by our Suppliers. This prohibition on forced labor is with reference to all forms of forced labor, including but not limited to: indebted labor, coerced labor, and prison labor. No worker in Sustana's employment or in the employment of our Suppliers should be required to pay any fees associated with recruitment, and all other methods used to force labor, including the lodging of deeds or personal documentation with the employer, as well as the threat of denunciation to authorities in retaliation for tendering resignation, are prohibited. Sustana shall publish an annual Modern Slavery Statement summarizing our actions to prevent forced labor and child labor in its supply chain.

Freedom of Association and Right to Collective Bargaining: Sustana respects the rights of our employees and the employees of our Suppliers to freedom of association and collective bargaining. Sustana prohibits acts of anti-union discrimination and interference in trade unions. Workers shall have the right to form, or not form, any trade association / group for workers' representation. For owned operations, Sustana is committed to engaging in social dialogue with key stakeholders, including collective bargaining in good faith with trade union representatives. In keeping with the principles of

transparency and fairness, for owned operations, we shall provide relevant information to trade union representatives to facilitate meaningful negotiations on topics that impact workers' well-being.

Freedom of Expression

Sustana believes that freedom of expression is a fundamental human right. As such, Sustana aims to create a safe space in which both Sustana's management and all staff engaged at Sustana's owned sites can express their opinions freely in line with local law.

Anti-Harassment / Anti-Abuse:

Sustana does not tolerate any form of harassment or abuse in its operations or at Supplier worksites. This includes all forms of harassment and abuse including, but not limited to: corporal punishment, mental or physical coercion, bullying, and sexual harassment.

Diversity and Inclusion / Non-Discrimination:

Sustana supports diversity and inclusion in both owned facilities and the worksites of our Suppliers. Discrimination is prohibited in both our owned sites and in the sites of our Suppliers related to: recruitment, hiring, training, promotion, compensation, separation, or any other aspect of employment. This includes any form of discrimination based on personal characteristics that do not interfere with a worker's ability to do a specific job, including, but not limited to: age, disability, medical or genetic information, ethnicity, race / color, national origin, religion, gender, gender identity, sexual orientation, marital status, pregnancy, parental status, affiliation or non-affiliation with a trade organization, or political beliefs. Sustana supports workplace diversity to solicit a variety of perspectives and foster creativity to better inform business decisions, including support for equality in all aspects, of note the aspect of gender, in the promotion of employees to managerial positions. This commitment is further detailed in our Diversity, Equity, and Inclusion Policy.

Remuneration and Benefits: Sustana and its Suppliers will pay wages and provide benefits in line with local legal requirements. If there are no legal requirements setting a minimum wage, then the expectation is that the employing unit pay wages in line with the industry prevailing wage. In all cases, employing units must also provide wages and benefits in line with the stipulations of applicable collective bargaining agreements (CBAs).

Working Hours: For Sustana's own employees, the company supports flexible working hours and locations as agreed upon by management. For both Sustana's own operations and Suppliers, working hours must respect the requirements of the law, as well as the stipulation of all applicable CBAs.

Health and Safety: Sustana is committed to fostering a safe and healthy work environment whereby operating standards meet or exceed all applicable laws, regulations, and standards to ensure the safety of our employees and workers who are not employees but whose work is controlled by Sustana. Sustana strives to maintain an environment that supports zero injuries, accidents, and unsafe behaviors. Furthermore, we are committed to promoting and ensuring these standards are upheld by our Suppliers and have integrated these principles and requirements in our Supplier Code of Conduct. This commitment is further detailed in our Health & Safety Policy.

Rights of Indigenous Peoples: Sustana respects legal and treaty rights of indigenous peoples. We acknowledge the cultural and socio-economic significance of water, land, forests, and biodiversity to the indigenous peoples of the United States and Canada, as well as from other regions from which we source products and services. We are committed to engaging in meaningful social dialogue and

collaborating with indigenous peoples to sustainably manage these valuable resources and mitigate as well as adapt to the adverse impacts of climate change.

Rights of Refugees and Migrants: Conflict, natural resource scarcity, climate change, natural disasters, and lack of economic opportunities are leading to increased numbers of refugees, migrants, and internally displaced persons (IDPs). We respect and are committed to promoting the protection of rights of refugees, migrants, and IDPs and support employment of refugees with appropriate right to work status at Sustana's owned sites.

Digital Security / Privacy / Personal Data Protection: In owned sites, Sustana will take measures to safeguard the security and privacy of personal data in line with all applicable legal requirements. Sustana also requires that Suppliers do the same for staff engaged at their sites.

Access to Water and Sanitation: Sustana recognizes access to clean water and sanitation as a human right and is committed to advancing progress against SDG 6 to ensure availability of clean water and sanitation for all. In its operations, Sustana strives to improve water efficiency, to recycle water in its operational processes, to monitor and reduce its water use intensity, to ensure quality wastewater treatment, and to avoid water withdrawal from high-stress areas.

Incident Reporting and Whistleblower Protection: Sustana employees or third parties working with Sustana have the right to submit a confidential report concerning any labor or human rights-related concerns, in line with the recommendations of Guiding Principle 31 of the UNGP. Sustana is committed to carrying out a timely investigation of any reports and ensuring the confidentiality and protection of the employee or third-party. Sustana has zero tolerance for any retribution within the company, recognizes the right of whistleblowers to raise concerns, and will work with them to ensure there is no retaliation for having brought forward a concern in good faith. Sustana employees or third parties can use the Ethics Reporting Hotline (3rd party hosted platform) to make an anonymous or non-anonymous report online or by phone: <http://sustana.ethicspoint.com/>

Risk Assessment and Management: Sustana shall assess human rights risks in its operations and supply chain and responsibly manage those risks that are likely to significantly affect its employees, relevant stakeholders, and communities in which it operates. Sustana shall maintain grievance mechanisms and an incident management system for confidentially reporting potential human rights issues and concerns. Sustana shall investigate and respond to reported incidents in a timely manner. Confirmed incidents and responses shall be analyzed, including in the aspect of root cause where risks are deemed material, and lessons learned shall be captured. Policies and Codes of Conduct shall be reviewed by the Environmental, Social, and Governance (ESG) and Enterprise Risk Management (ERM) Committees on an annual basis and revised to reflect lessons learned where appropriate.

Governance, Internal Accountability, and Policy Implementation

This policy is supported and has been approved by Sustana's Chief Executive Officer (CEO), Chief Human Resources Officer (CHRO), and Vice President of Sustainability.

Sustana is committed to integrating labor and human rights considerations throughout our governance structures, policies, operations, and risk management frameworks. Responsibility for oversight of risks and actions pertaining to labor and human rights primarily rests with the Board of Directors (BoD) and Senior Management level ESG Committees. The BoD Audit and the internal Senior Management

Enterprise Risk Management (ERM) Committees also have oversight of risks, opportunities, and external disclosures deemed financially material. Furthermore, individual risk oversight may be delegated to representatives of various business units and functions within the ESG Technical Working Group, including Human Resources, Operations, and Procurement and Supply Chain Management.

The Senior Management ESG Committee shall review this policy annually to make continuous improvements to our labor and human rights risk management systems in order to better prevent adverse social impacts. Sustana shall also, in future, seek to have the company’s implementation of this policy verified by a non-biased third-party institution.

Communication and Transparency

This policy shall be made publicly available on Sustana’s website and shared with all employees. It shall be referenced in Sustana’s Employee Handbooks, Employee Code of Conduct, and Supplier Code of Conduct. Individuals in Sustana operations that are key in implementation of this policy shall be trained on its content as appropriate for their roles.

Sustana shall measure its human rights risks and report externally on an annual basis in support of SDG12 Target 12.6. This reporting may take the form of an annual ESG or sustainability report.

Legal Disclaimers

Sustana reserves the right to modify this policy at its discretion. Updated policies will be shared in a timely manner.

Effective: June 27, 2023

Document Control

This policy must be reviewed and approved by the ESG Committee on an annual basis.

Action	Major Revisions and Comments (if any)	Version and Date
Executed	First version drafted by the Vice President of Sustainability, and reviewed by the CEO, CHRO, and COO.	Version 1 June 27, 2023
Executed	Ethics Reporting Hotline added	Version 1.1 August 11, 2023



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