

Simko North America LLC 2 N. Cascade, Suite 800 Colorado Springs, CO 80903

Quality Management Policy

Simko North America (SNA) has embraced the philosophy of "Closing the Gap." We aim to be the premier logistics provider, bridging the gap to deliver customers access to essential materials from across the world; demystifying and streamlining the worldwide supply chain, and securing domestic supplies. Our approach is grounded in our core values (appendix A) including transparency, honesty, sustainability, and integrity. We are committed to legal compliance, progressive management practices, dynamic human resources, a secure working environment, exceptional product value in terms of price and quality, continuous improvement, and a steadfast pursuit of business excellence.

Environmental Management Policy

Simko North America is committed to minimizing environmental impacts by adhering to environmental legislation, preventing pollution, reducing waste, and conserving resources. We strive to minimize energy and water usage, promote environmentally responsible procurement, and continuously improve our practices to reduce environmental impacts. Through education, training, and engagement, we empower employees and partners to uphold environmental sustainability standards. We support and encourage sustainable practices among suppliers, align with customer sustainability policies, and review our environmental policy annually to ensure ongoing relevance and effectiveness.

Policy Commitments

Customer Focus

- Actively engage with customers to understand their needs and provide tailored supply chain solutions.
- Maintain open communication and ensure customer satisfaction through timely delivery and consistent quality.

Compliance and Standards

- Adhere to all applicable legal, regulatory, and industry requirements.
- Align operations with the Science Based Targets Initiative (SBTi).
- Uphold the principles of the Global Platform for Sustainable Natural Rubber (GPSNR) framework in all business activities.
- Operate in alignment with UN Sustainability Development Goals.

Continuous Improvement

• Use performance metrics to monitor and enhance the quality of our services.



- Foster innovation and invest in training and development to ensure a skilled and motivated workforce.
- Periodically review and update processes, aligning with ISO 9001 standards for quality management.

Partnership and Collaboration

- Work closely with suppliers to promote sustainable practices and ensure the reliability of our supply chain.
- Encourage suppliers to implement quality management systems and contribute to shared sustainability goals.

Compliance and Legal Requirements

- Adhere to all applicable environmental laws, regulations, and standards.
- Promote supplier compliance with environmental policies, including responsible sourcing and conservation of ecosystems.

Pollution Prevention and Resource Efficiency

- Reduce greenhouse gas emissions, energy consumption, and waste throughout our operations and supply chain.
- Encourage the use of renewable and recycled materials.
- Promote sustainable waste management and sever relationships with stakeholders employing open burning practices.
- Steward water, soil nutrient, and peat conservation and protection throughout our supply chain.
- Manage operations to minimize rate of energy usage.
- Manage operations to maximize natural resource efficiency.
- Minimize and mitigate carbon emissions.

Healthy, Functioning Ecosystems

- Source in a way that does not contribute to deforestation or degrade high conservation values.
- Work solely with producers Identifying and managing areas for development and conservation follow the methodology and guidance consistent with the HCV Approach and with the High Carbon Stock Approach (HCSA) avoiding deforestation and degradation of environments.
- Refuse to deal with suppliers utilizing lands degraded since 2019.



- Require supplier protection of forests and ecosystems. Simko and its suppliers must not engage in open burning.
- Protect water quantity and quality, preventing water contamination from agricultural and industrial chemicals, and preventing erosion and sedimentation.
- Protect soil quality, preventing erosion, nutrient degradation, subsidence and contamination.
- Prevent the development of or sourcing from natural rubber plantations on peat, regardless of depth, extent, or status (wet, drained or dry).
- Promote traceability and transparency to ensure materials are sourced responsibly.

Respecting All Human Rights

- Avoid causing or contributing to adverse human rights impacts and preventing or mitigating any harm linked to company operations.
- Establish and maintain a company grievance mechanism (consistent with UNGP effectiveness criteria) to receive complaints and remedy adverse impacts they have caused due to production and sourcing.
- Recognize and protect the customary, traditional and communal land tenure rights of indigenous peoples (IP) and local communities (LC). Establish ongoing, effective, culturally appropriate channels of dialogue with IP and LC.
- Ensure prior to any activities that might affect IP/LC rights, free, prior, and informed consent (FPIC) will be secured. The FPIC process must be done in a culturally appropriate manner and follows credible accepted methodologies and associated GPSNR guidance. IP/LC have the right to give or withhold their consent to any activity that is subject to the FPIC process.
- Where operations impinge on IP/LC rights, compensate or accommodate IP/LC through appropriate, mutually agreed measures reflecting and described in the negotiated outcomes of the FPIC process.
- Adopt measures to provide remedy through mutually agreed procedures in cases where the
 company previously has caused or contributed to the appropriation of or harm to the lands,
 territories, or resources of IP/LC without securing FPIC. Implementation is jointly monitored by
 the community and the GPSNR member and/or by mutually agreed third party(ies).
 - The accepted methodologies to be followed for the FPIC process are:
 - UN-REDD (2012) Guidelines on Free, Prior and Informed Consent
 - RSPO (2015) Free, Prior and Informed Consent for RSPO Members
 - FAO (2015) Free, Prior and Informed Consent Manual



- Uphold applicable labor rights and labor laws in the jurisdictions where operating, the UN
 Guiding Principles on Business and Human Rights, and the intent of the International Labor
 Organization's eight core conventions. This includes:
 - Freedom of association and collective bargaining (1LO Convention No. 87 and No. 98)
 - No forced labour (LO Convention No. 29 and its 2014 Protocol)
 - No child labour (ILO Convention No. 138 and No. 182)
 - Decent living wages
 - No discrimination (ILO Convention No. 111 and No. 100)
 - Legal working hours
 - Safe and healthy workplaces
 - No abusive practices (ILO Convention No. 105)
 - Gender equity
 - o Safeguards apply to all workers, including contract, temporary and migrant workers.

Ongoing Advancement and Monitoring

- Set measurable environmental objectives and regularly assess progress.
- Review and update environmental management practices in line with evolving standards and stakeholder feedback.
- Trace environmental impact throughout supply chain and communicate findings with stakeholders.
- Educate employees and suppliers on sustainable practices and environmental stewardship.
- Offer or support training for natural rubber producers, including smallholders, to improve yield and quality.
- Use performance metrics to regularly monitor progress towards company commitments and enhance the quality of our services
- Apply monitoring systems and practices to incorporate crowd-sourced information from local stakeholders and affected parties regarding non-conformance with commitments. Information sources may be informal or formal.
- Report publicly on progress and outcomes related to the implementation of policy-related commitments at least annually.

Systems and Processes to Drive Effective Implementation of Policy Components

• Set public, timebound and geographic-specific targets and milestones with their associated



indicators/metrics for applying its commitments.

- Embed commitments into decision-making processes, systems, and performance metrics of corporate management, relevant business units, joint ventures, and company affiliates and subsidiaries
- Maintain an active, regular stakeholder dialogue to provide relevant information, and to afford Opportunities for feedback and suggestions related to fulfillment of the company's commitments.
- Participate in/supporting multi-stakeholder planning and policy efforts that uphold the GPSNR principles at a landscape, jurisdictional or other spatial level.

Supply Chain Assessment, Traceability, and Management Applicability

- Conduct supply chain mapping and assessing suppliers for social and environmental risk to prioritize risk mitigation actions.
- Support traceability of natural rubber, at a minimum to an appropriate jurisdictional level, to know or control the conformance of purchased materials with GPSNR Policy Components.
- The level of traceability will differ for each ""node"" of the supply chain and will be
 documented, with justification for why the desired level of traceability may not be reached for
 all supply chains and plans to achieve this level. The appropriate jurisdictional level will be
 defined in the implementation guidance.
- Communicate to all suppliers of natural rubber that material produced and processed in accordance and conformance with the GPSNR Policy Components will be preferred.
 Providing time bound requirements for meeting the policy requirements, and ensuring that supplier codes and contracts, engagement activities, and other mechanisms reflect these supplier expectations.
- Regularly engage the supply chain (both direct and indirect suppliers) to support their conformance with company commitments through effective incentives, support mechanisms, and purchase monitoring systems.
- In instances of supplier non-conformance with GPSNR Policy Components, develop timebound implementation plans to move towards conformance and/or remediation or past or ongoing harms.

Community and Stakeholder Engagement

- Partner with stakeholders to support community development and conservation initiatives.
- Encourage suppliers to adopt environmental management practices that benefit local communities and ecosystems.



- Uphold and advocate for human rights throughout our supply chain, ensuring fair treatment, safe working conditions, and freedom from exploitation.
- Support local communities involved in natural rubber production by fostering inclusive economic opportunities and ethical practices.
- Ensure respect for land rights and engage in fair consultation with communities impacted by rubber production activities.
- Support decent living conditions of local communities (e.g, drinking water, adequate housing sanitation).
- Support the right to food and food security of individuals, households and local communities.
- Support the economic, social and cultural rights of local people, including through access to education and employment.

Maxine Luckett – General Manager Simko North America, February 2025



Rev.	Nature of changes	Approval	Date
0	Original release	DSR, ML, WHL	04/18/22
1	Updated Environmental Policy	ML, WHL	10/04/23
2	Major update. Added core values (appendix A), aligned with GPSNR framework, added policy commitments section. updated logo.	ML, IV	12/04/24
3	Amended for full alignment with GPSNR Framework after presented with Audit results.	ML, IV	12/18/24
4	Amended for full alignment with GPSNR Framework after presented with Round 2 Audit results.	ML, IV	2/11/2025



Appendix A: Core Values

Trustworthy Partner

Trustworthy partner
Our accountability
is our cornerstone

We hold ourselves accountable because we genuinely care about our business. Internally & externally, we are transparent, communicative & conscientious.

Innovative Solutions

Proactive answers Innovative solutions Simko supply chain

There is no one-size fits all supply chain solution. We listen to our customers' goals and responsibly craft individualized supply chain solutions. We proactively monitor & manage risk. We seek purposeful improvement and adapt when necessary. Customer satisfaction is our ultimate goal. We aim to exceed expectations, solve problems and earn our customers' trust.

Holistic Sustainability

Holistic approach to sustainability our philosophy

"Holistic Sustainability" represents the heart and soul of our core values. We are committed to a broader definition of sustainability, one that balances financial returns with environmental responsibility, social impact, and business longevity.

Humbly Confident

We learn from the past then look to the future Humbly Confident

We act & speak in our areas of expertise, and we listen & learn from our trusted partners. We value our generations of industry insight and our incredible global network. This is how we fit into the world, creating value, and building a legacy of excellence, humility, and impactful change.

Confidential Cooperation

Positivity, Cooperative spirit Simko at its heart

If you want to go fast go alone, if you want to go far, go together. We are champions of collaboration & teamwork. Positivity and mutual respect are essential to our success.