






# RCSS-ESG-02PL001 R01

## SUSTAINABILITY POLICY

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Review and Approval			
Title	Name (Printed)	Signature	Date
Chief Human Resource Officer	Rindi St. John		April 1, 2024
General Counsel	Fiona Sutherland		April 1, 2024
Chief Executive Officer	Talman Pizzey		April 1, 2024

**Notes:**



<b>Revision Summary</b>		
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## 1.0 OBJECTIVE

To establish an Environmental, Social and Corporate Governance program focused on continuous improvement and improved sustainability. We are focused on becoming more sustainable resulting in decreased environmental impact, increased social interaction across diverse groups in society, and the highest level of corporate governance and ethical conduct.

## 2.0 SCOPE

This policy applies to all Rockwood businesses, including all Acuren entities, and all owned subsidiaries and affiliates ("Rockwood" or the "Company").

## 3.0 COMMITMENT

Rockwood is committed to operating our business sustainably. This means meeting the needs of our shareholders as well as the needs and concerns of our employees, customers, communities in which we operate, and regulators.

Rockwood is committed to working with our employees, customers, regulators, suppliers, and investors to secure a sustainable future and improve the social, economic, and environmental well-being of the communities in which we operate, thereby creating a competitive advantage for the betterment of all, including bottom-line growth and shareholder confidence.

## 4.0 APPROACH

At Rockwood, we believe sustainability is an evolution, and we continuously work toward greater sustainability as a company. We believe in the importance of transparency, and we remain focused on expanding our sustainability efforts.

Our approach to sustainability is integrated across our business activities and takes into consideration the United Nations Sustainable Development Goals (SDGs).

<https://sdgs.un.org/goals>



## 5.0 ENVIRONMENT

We recognize environmental protection as one of our guiding principles and a key component of sound business performance. We are committed to delivering first in class services to our customers in a manner that ensures a safe and healthy workplace for our employees and minimizes our potential impact on the environment. We operate our business in compliance with all relevant regulatory requirements, and we strive to use environmental best practices in all that we do.

We are committed to addressing the environmental implications of our activities through:

- Implementation of our management systems and procedures specifically designed to minimize hazardous materials, use of energy and other natural resources, to minimize the generation of waste, and to enable recycling and reuse of materials
- Promoting environmental awareness with our employees and encouraging them to work in an environmentally responsible manner

- Communicating to all personnel that compliance with environmental regulation is a minimum expectation
- First-in-class Radiation Safety compliance and controls
- Promoting responsible use of resources, including energy and water, while minimizing emissions from our operations
- Encouraging the purchase and use of environmentally responsible products and monitoring our supply chain practices
- Continually seeking opportunities to improve our environmental performance
- Supporting a responsible energy transition towards a low carbon footprint

### 5.1.1 **Our Environmental Strategy**

We minimize our environmental impact through:

- Reducing fuel consumption and increasing efficiency
- Reducing our office footprint by downsizing and reducing office space and offering alternative work arrangements
- Developing green technologies
- Reducing waste through re-use and recycling
- Purchasing environmentally friendly products
- Responsibly disposing of heavy metals
- Responsibly using water and electricity
- Reducing paper usage
- Establishing environmental objectives and targets, measuring progress, and reporting our results

## 6.0 **SOCIAL RESPONSIBILITY**

Rockwood is committed to providing a safe, respectful, and inclusive workplace. This commitment applies to each of our employees and includes our efforts to develop inclusive opportunities for all members of society, including creating meaningful employment and business opportunities for all.

We do this by:

- Increasing the diversity of our workforce
- Increasing the diversity of our supply base
- Continuing to ensure a best-in-class safety culture and work environment
- Fostering the economic and social development in the communities in which we operate
- Measuring and improving employee engagement via surveys and follow-up actions
- Committing to the communities in which we operate as demonstrated through our sponsorships, our presence at community events, and our volunteer activities



### 6.1.1 **Our Social Responsibility Strategy**

We will meet our social responsibility commitments through:

- Creating strategies to improve diversity
- Maintaining best-in-class in radiation safety targets
- Fostering an environment of engaged motivated employees
- Encouraging employees to volunteer through programs organized internally or externally
- Conducting annual employment engagement surveys and addressing opportunities for improvement with action
- Improving our leadership effectiveness through surveys, incentives, and development programs

### 6.2 **Indigenous Inclusion**

Rockwood is committed to Indigenous inclusion through trust-based, respectful relationships that are mutually beneficial. Our focus is to work collaboratively with our customers and Indigenous communities on a path to reconciliation. We understand that relationship building, and reconciliation are a journey that must be approached with humility.

We will do this by:

- Committing to ongoing cultural learning and understanding
- Communicating respectfully, transparently and in a culturally sensitive manner
- Identifying meaningful economic benefit opportunities
  - Engaging Indigenous business capacity
  - Including Indigenous Peoples in our workforce
- Building sustainable relationships through community involvement

#### 6.2.1 **Our Indigenous Strategy**

Our strategy focuses on providing training, mentorship, and meaningful employment to Indigenous people through:

- Enhancing and understanding Indigenous cultures and rights
- Actively engaging and partnering with Indigenous communities
- Developing specific training and mentoring programs
- Establishing an appropriate workplace environment that allows our company to attract and retain Indigenous employees
- Investing in projects and initiatives that create both short-term and long-term economic benefits



## 7.0 GOVERNANCE

Core to our business is unwavering corporate governance requirements and a robust risk and compliance framework. Our policies and procedures establish the standards that guide our actions and ensure the highest levels of responsibility, integrity, and legal compliance in all that we do. We believe they are the foundation for delivering on our commitments. We expect our directors and our employees to conduct themselves with high levels of personal and professional integrity at all times.

We do this through:

- Code of Conduct Training
- Cyber Security awareness training
- ESG Board Committee
- Audit Committee
- Board governance

We foster an environment of direct communication to resolve issues in a timely and professional manner. Our Ethics Hotline is an anonymous alternative to report any suspected compliance violations, unethical behaviour, or fraud.

### 7.1 Reporting

As a part of our commitment to sustainability, we will annually conduct an analysis and report on the results on in our *Annual Sustainability Report*, with the inaugural report being released in 2023. Our annual sustainability report will be made public and available on the Acuren website:

<https://www.acuren.com/about/sustainability/>

## 8.0 ACTION PLAN

Our “Roadmap to Sustainability” identifies specific actions targeting improvements in our pillars and will ensure that our goals are achieved and that they are meaningful and support a sustainable, safe, and healthy planet.



9.0 REFERENCES – COMPANY POLICIES AND RESOURCES

The following policies/procedures support our Sustainability program. For more detailed information, refer to the full document.

<b>Governance</b>	<i>Rockwood Code of Conduct</i>	
	<i>Annual Sustainability Report</i>	
	<i>Anti-Bribery Policy</i>	RCSS-HR-02PL002
	<i>Sustainable Procurement Policy</i>	RCSS-PUR-02PL001
	<i>Security Training &amp; Awareness Policy</i>	ACU-ITTA-22PL01
<b>Social Responsibility</b>	<i>Respectful Workplace Policy</i>	RCSS-HR-02PL004
	<i>Accessibility Policy (CA)</i>	CAN-HR-02PL004
	<i>Progressive Discipline Policy</i>	ACU-HR-PL001
	<i>Social Media Policy</i>	ACU-HR-02PL002
<b>Indigenous Relations</b>	<i>Indigenous Relations Policy</i>	RCSS-HR-02PL001
<b>QHSE &amp; Environment</b>	<i>Integrated Management System</i>	ACU-IMS-22M001
	<i>QHSE Policy (CA)</i>	CAN-SMS-22M002
	<i>Safety Management System (US)</i>	US-SWP-01
	<i>Radiation Safety Management System</i>	CAN-RSMS-RS-1004
	<i>Environmental Policy</i>	RCSS-SMS-M003
	<i>Environmental Compliance Safe Work Practice (US)</i>	US-SWP-02
	<i>Waste Management Procedure (CA)</i>	CAN-SMS-10P061
	<i>Drug &amp; Alcohol Policy (CA)</i>	CAN-SMS-10M004
	<i>Drug &amp; Alcohol Program (US)</i>	US-SWP-05





<b>EthicPoint</b>	<p>Reports can be submitted <b>anonymously</b> at the Rockwood/Acuren Ethics Hotline. Upon receiving a complaint or report, the Corporation will promptly (and to the extent practicable, confidentially) investigate and take appropriate action.</p> <p>Under no circumstances will any employee be subject to any disciplinary or retaliatory action for making a good faith report of suspected improper conduct and/or for cooperating in a Corporate investigation.</p> <p>The Rockwood/Acuren Ethics Hotline:  <a href="http://acuren.ethicspoint.com/">http://acuren.ethicspoint.com/</a>  1-833-706-0061 (USA and Canada)  0800-048-8581 (UK)</p>
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**10.0 RESPONSIBILITIES**

- 10.1 The **General Counsel** is accountable for the development and maintenance of programs that achieve the requirements of this policy.
- 10.2 **Senior leaders** are accountable for ensuring that this policy is effectively implemented within their respective functions.
- 10.3 **All employees and contractors** are expected to comply with this policy and support others in doing so.

**11.0 CONTACT**

For questions related to this policy, contact the General Counsel.