



Dempsey Corporation

Human Rights Policy

Effective Date: December 18, 2024

Prepared by: VP - ESG

Version: Public Web Version

Our Commitment

Dempsey Corporation is committed to upholding the dignity, freedom, and equality of all individuals affected by our operations and supply chain. We respect internationally recognized human rights and labor standards and are committed to preventing any form of abuse, exploitation, or discrimination in the workplace.

Scope

This policy applies to all employees, contractors, and third-party partners globally. It also guides our interactions with suppliers, service providers, and community stakeholders. It aligns with Dempsey's obligations under Canada's Bill S-211 (Fighting Against Forced Labour and Child Labour in Supply Chains Act).

Guiding Standards

We align our human rights commitments with the following international frameworks:

- The Universal Declaration of Human Rights
- The International Labour Organization (ILO) Core Conventions
- The UN Global Compact (Principles 1–6)
- The OECD Guidelines for Multinational Enterprises

Key Policy Commitments

Prohibition of Forced and Child Labor

We maintain zero tolerance for:

- Child labor
- Forced, bonded, or involuntary labor
- Human trafficking and exploitative recruitment practices

All employment at Dempsey must be freely chosen, and all workers must be of legal working age as defined by local law.



Dempsey Corporation

Human Rights Policy

Equality and Non-Discrimination

We do not discriminate in hiring, compensation, promotion, or termination based on gender, age, race, disability, religion, sexual orientation, or any protected ground. Equal opportunity is a principle embedded in our recruitment and performance systems.

Fair Working Conditions

We commit to:

- Fair wages aligned with local law
- Reasonable working hours and rest periods
- Workplace safety and mental health support
- Written terms of employment, accessible in a language understood by employees

Freedom of Expression and Association

All employees have the right to express concerns, participate in decision-making, and access fair grievance mechanisms without fear of retaliation. We also respect the right to freedom of association, even though we are a non-unionized employer.

Grievance Mechanism

A confidential whistleblower reporting mechanism is in place for internal or supply chain-related human rights concerns. Reports may be submitted via redflag@dempseycorporation.com and are reviewed independently.

Supply Chain Expectations

Our Supplier Code of Conduct explicitly prohibits forced labor, child labor, and unsafe working conditions.

We:

- Require suppliers to certify adherence to human rights standards
- Conduct risk-based assessments and documentation reviews
- Support supplier improvement through corrective action plans and training

Suppliers identified as operating in high-risk regions or sectors are prioritized for audits and engagement.



Dempsey Corporation

Human Rights Policy

Due Diligence and Transparency

Dempsey maintains a human rights due diligence process to:

- Identify and assess risks
- Monitor compliance with internal and supplier-level controls
- Publish summaries of progress in our ESG Annual Report

We track human rights indicators as part of our EcoVadis and legislative reporting.

Training and Accountability

All managers and HR professionals receive training on labor rights, ethical recruitment, and non-discriminatory practices. Our ESG team oversees policy implementation, conducts monitoring, and drives continuous improvement.

Note: Metrics related to our human rights performance, due diligence activities, and supply chain assessments are published annually in the Dempsey ESG Report, available on our website.