

### **UNGC COP 2021**

### UPDATED STATEMENT FROM THE CEO

To our stakeholders:

I am pleased to confirm that Array Marketing reaffirms the support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

This is our second annual Communication of Progress, within which we describe our actions to continually improve the integration of the Global Compact and its principles based on our business strategy, culture, and daily operations. We also commit to sharing this information with stakeholders using our primary channels of communication.

Sincerely yours,

Steve Kremser

**CEO** 



# **Table of Contents**

| 1.0 About this Document  | 3  |
|--|----|
| 2.0 Our Company  | 4  |
| 2.1 Governance   | 6  |
| 2.2. Risk Assessments  | 7  |
| 2.3 Investigations   | 7  |
| 3.0 Value Chain Members  | 8  |
| 4.0 Human Rights   | 9  |
| 4.1. Commitment to Human Rights                                      | 10 |
| 4.2 Human Rights Management System                                   | 10 |
| 4.3 Human Rights Monitoring and Evaluation                           | 11 |
| 5.0 Labour Management  | 11 |
| 5.1 Labour   | 12 |
| 5.2 Labour Management System   | 14 |
| 5.2.1 Employee Training  | 14 |
| 5.2.2 Health and Safety  | 15 |
| 6.0 Environmental Management   | 18 |
| 6.1 Environmental Practices  | 19 |
| 6.2 Environmental Management System                                  | 20 |
| 6.3 Environmental Monitoring and Evaluation                          | 22 |
| 7.0 Anti-Corruption  | 24 |
| 7.1 Anti-Corruption Practices  | 24 |
| 7.2 Anti-Corruption Management System                                | 25 |
| 7.3 Anti-Corruption Monitoring and Evaluation                        | 26 |
| 8.0 Empowering Responsibility at Array Measures of Success           | 27 |
| 8.1 EcoVadis   | 27 |
| 8.2 Carbon Disclosure Project  | 28 |
| TAKING ACTION IN SUPPORT OF BROADER UNITED NATIONAS GOALS AND ISSUES | 28 |
| APPENDIX A: GRI REQUIREMENTS   | 30 |



### COMMUNICATION OF PROGRESS

## 1.0 About this Document

This Communication of Progress (COP) is a stand-alone document covering the operations at Array Marketing Canada Inc., inclusive of all direct or indirect subsidiaries and controlled affiliates ("Array" or "The Company"). This is COP covers our activities from January 2021 to December 2021, which aligns with our annual reporting cycle. This time period is also consistent with the calendar year and our fiscal year.

This document is reflective of our actions and policies related to Human Rights, Labour, Environment and Anti-Corruption. Our progress and commitment to each of these focus areas is measured in both qualitative and quantitative measurements to assess the degree to which each of our targets and or performance indicators have been met. This report has been developed in accordance with the GRI G4 Guidelines and GC Advance COP Self-Assessment Submission Guide. Information regarding the adherence to these guides can be found in Appendix A. A third party has not verified this COP. This COP will be shared with stakeholders through the UN Global Compact (UNGC) website and made available to all interested parties. Due to the current circumstances regarding COVID19, Array's plan for 2022 is to maintain all current programs.

For questions regarding the content in this document please contact Dana Michaud, Director - Sustainability & Risk Management.

#### What SDGs our activities are addressing.

Array has been a member of the UNGC since 2019. We have made this commitment to show our support towards the Sustainable Development Goals (SDGs). Figure 1 below highlights the SDGs with which we have aligned our operations. Throughout the remainder of this COP, activities, actions, programs, procedures and policies to address these SDGs will be discussed. In addition, we will address how we have developed and implemented initiatives to align our core business strategies with the SDGs and how our products and services are designed to contribute to them.





Figure 1: Array Operations Aligned with Sustainable Development Goals

## 2.0 Our Company

Array provides high-end merchandising solutions for the world's leading brands and retailers, primarily within beauty industry. Our products and services include all aspects from design and development through to the manufacturing and installation of customized point of purchase displays. Array is a private-equity owned company, by the Carlyle Group, headquartered in Toronto, Ontario and employs approximately 2000 individuals throughout our global operations. Our operations consist of manufacturing and sales offices throughout the Americas, Europe (EMEA) and Asia Pacific (APAC). Globally in 2021, our headcount was 1846.

Empowering Responsibility at Array (ERA) encompasses all initiatives, actions, programs and policies that make up Array's Corporate Social Responsibility (CSR) Program. Additional information and specifics of these elements will be discussed throughout the remainder of this COP, as aspects of this program are related to Array's practices on Human Rights, Labour, Environmental, and Anti-Corruption. We will also highlight how our practices are influenced by the SDGs.

The ERA program helps to ensure that our operations throughout the Company are developing sustainably by striving to achieve an equilibrium between our three distinct lenses, which we refer to as our three pillars. Theses pillars ensure that during the decision-making process, consideration is given to environmental, social and economic factors. Figure 2 below highlights the distinction between



these three pillars. Consideration of all three pillars is applied during the decision-making process. The distribution of our efforts across the pillars may vary depending on the circumstances of the desired outcome, but the goal is to achieve equilibrium as often as possible.

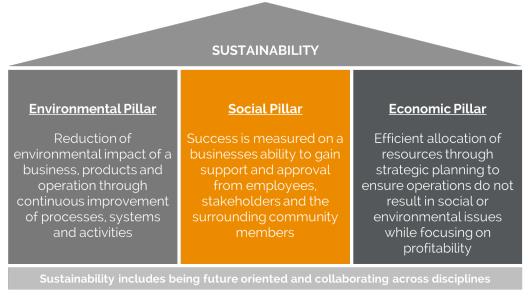


Figure 2: Array's three pillars of sustainable development

To further highlight our commitment to sustainable development, Array has implemented an overarching Safety and Sustainability policy that states "Everyone shares equally in the responsibility of promoting a safe and healthy work environment and ensuring the sustainable operation of our business". This policy is reinforced by our corporate objectives and goals related to both safety and sustainability (Figure 3 below). Progress towards these goals and objectives will be discussed in the remainder of this COP.

OBJECTIVE: Improve the Environmental, Health and Safety Risk Profile of Array's business – ensure compliance and standardize risk tolerance throughout the company and provide training to all levels of the of the organization to support a strong safety culture at all Array locations

GOAL: Total recordable incident rate – 10% reduction (Compared to previous year's results)

OBJECTIVE: Achieve a level of sustainability performance above industry average and make sustainability part of Array's Value Proposition.

GOAL: Integrating our Sustainability plant with business to ensure that Array's CSR provides measured in Carbon Disclosure Project and value to clients

EcoVadis

Figure 3: Safety and sustainability goals and objectives



Array's CSR objectives and goals are carried by everyone at the organization from the executive team to the front line employees. The executive team and selected management members received monetary incentives based on the achievement of these CSR goals. Other employees from the Commercial Group, Operations, Human Resources, Strategic Purchasing, and Quality Assurance also received either monetary incentives or recognition for their contributions towards the achievement of these objectives and goals.

### 2.1 Governance

Ultimate responsibility for Array lies with the Board of Directors (Board). Array's Board is comprised of managing directors and associates from Oaktree, the Carlyle Group and members of Array's executive leadership team. The Board is very active and engaged in Array's operations and activities and formally meets on a quarterly basis to review Array performance inclusive of sustainability and CSR initiatives. During these meetings, the Board will provide direction and discusses current and future deliverables and expectations. In addition, Array provides them with financial updates on a monthly basis. Further to these formal meetings, the Board will meet as required given the current circumstances and conditions that have the ability or have an impact on our organization.

Throughout 2021, an executive team consisting of our Chief Executive Officer (CEO), Chief Operating Officer (COO), Chief Financial Officer (CFO) and Senior Vice President, Human Resources (SVPHR), oversaw Array's operational control. The CEO has ultimate responsibility for Array's operations and provides the board with updates on a regular basis. The COO is responsible for the operations side of the business including production, engineering, procurement, materials management and logistics. The CFO is responsible the financial aspects of the business including the allocation of funds for capital expenditure for CSR projects. The VPHR is responsible for the human capital aspects of the organization and oversees the Sustainability and Risk Management Team.

The Sustainability and Risk Management (SRM) team is responsible to support the implementation of Array's CSR program and strategy. Guidance is provided by the executive team, but the SRM department is responsible for the overall governance of the ERA program. Requests related to CSR are funneled through their office and directed to the appropriate business divisions and sites to maximize performance and avoid unintended negative impacts. In addition, they are responsible for global development of the ERA program and risk management assessments. Array has adopted this structure to ensure coordination amongst the business divisions globally, and consistency throughout Array's operations. Finally, this team holds responsibility for leveraging synergies to achieve global corporate CSR commitments and objectives.



### 2.2. Risk Assessments

Array believes that it is important to understand the risks that our business faces and their potential impact. During the risk assessment process, all disciplines within Array are considered and included in the evaluation and associated discussions, so that a full picture of risks can be obtained and considered. The types of risk we evaluate are Current and Emerging Regulations, Technology, Legal, Market Conditions, Reputation, Physical, Upstream and Downstream.

The process for identifying risks includes routine tracking of performance indicators (at least monthly) and analyzing trends and anomalies, regular evaluation of industry insights and trends (both internal evaluations and participation in networking groups/events). Monthly meetings are held between our organization and client groups. We further receive input from our private equity owners and third-party insurance representatives.

Once risks have been identified, an evaluation of the nature and the severity of the risks is assessed using risk matrices, populated by inter-disciplinary teams. Evaluated risks are then assessed in terms of time horizons and risk classification at both the asset and Company level. Time horizons are considered on a short (zero to one year), medium (one to three years) or long (three to ten years) term horizon and risk classified on an A-B-C rating scale (A = severe/catastrophic, B = major/significant, C = minor). Priority is given to risk that affect our organization and private equity ownership reputation and business action and continuity plans are developed accordingly.

Identified risk are monitored at least quarterly, through Array's Risk Registry. This process involves evaluating the register's OSGM process (Objectives, Goals, Strategies and Measures). This process involves developing detailed action plans including setting objectives, determining relevant goals, developing strategies to achieve the goals and measures to monitor and track performance against these goals. Action plans are reviewed and adjusted as appropriate.

Risks related to health and safety are identified and addressed through our Hazard Identification and Risk Assessment tool. Information on this process can be found in section 5.2.2, Health and Safety of this COP. For the purpose of this COP, we will be focusing on risks related Human Rights, Labour Practices, Environmental Management and Anti-Corruption for the remainder of this document.

# 2.3 Investigations

Array has developed a standard investigation process that can be used for any incident that is reported, whether it be related to Human Rights, Labour Practices, Environmental Management or Anti-Corruption. Array has engaged with an independent third-party to allow employees an opportunity to confidentially (whistle-blowing) report an allegation related to the Code of Conduct. The process begins with placing a confidential call into a toll-free Integrity Help-line. The third-party will initiate an



investigation prior reporting the incident to Array for further actioning. When a concern or issue is raised internally, the Human Resources (HR) Department will work with the reporting individual to understand the nature of the concern or complaint, so that an investigation can be carried out. All complaints will be investigated promptly, confidentially and impartially by an appropriate manager and/or member of the Human Resource Department. If the incident or complaint involves a senior executive of Array, an external person qualified to investigate will be retained. A final decision and recommendations will be made following the investigation, and all parties will be advised of the decision and if any corrective action has been or will be taken. It is important to note that an employee cannot and will not to be penalized for reporting an incident or participating in an investigation under the reprisal section of Array's Code of Conduct and Business Ethics (the Code).

### 3.0 Value Chain Members

At Array, sourcing with integrity is a key component to the way we do business. We expect members of our value chain to uphold the same values and principles of business conduct that we do. Under our ERA program we have engaged our upstream and downstream value chain partners through the implementation of our Sustainable Procurement and Contractor Safety Management Programs. These partners include but are not limited to suppliers, subcontractors, contractors, and consultants. To ensure the effective implementation of these programs, we have trained all key buyers on when they are required to have stakeholders participate in these programs.

Our Sustainable Procurement Program aims at integrating our three pillars and the SDGs into our value chain and procurement practices to ensure that business decisions are not solely made based on cost. Under this program we have developed a Supplier Code of Conduct and Supplier Survey. The Supplier Code of Conduct highlights the importance that Array places on value chain members to adhere to strong social, environmental and safety standards in all aspects of their operations. The Supplier Code of Conduct also defines our minimum expectations and standards that must be met for Array to do business with these partners. The main topics covered in the Supplier Code of Conduct include: Legal & Ethical Expectations, Human Rights & Labour Standards, Environment, Health & Safety, Bribery & Corruption, Conflict of Interest and Supplier Accountability. Under the Supplier Code of Conduct, Array reserves the right to audit compliance against our expectations outlined in the code. Audits carried out by Array are aligned with SA8000, SMETA 4-pillar and/or ISO 14001 standards. In 2021, 100% of our key factory partners in China had current audits. Corrective actions from these audits are documented and verified upon completion. The Supplier Survey is a supporting document to the Supplier Code of Conduct. The Supplier Survey helps to evaluate the strength of our value partners CSR programs. Measures of success are based on the percentage partners who have signed the Supplier Code of



Conduct. To date we have had 100% of our value chain partners based on 75% of Array's total spend complete the Supplier Survey.

Value chain partners who perform work at Array facilities are required to also adhere to our Contractor Safety Management Program. Array's Contactor Safety Management Program states our commitment to ensuring the health and safety of all workers who preform work on company property, including contractors. The expectation is that all value chain partners who are performing work onsite have reviewed the Contactor Safety Program and signed the Acknowledgement Form prior to arriving to conduct work onsite. The overarching Safety Management Program outlines all safety requirements imposed on contractors working at Array and how it is communicated to them. When a purchase order issued, Array's Purchasing Department is responsible for ensuring that the value chain partner has received a copy of the Contactor Safety Program and has a signed copy of the Acknowledgement Form. Value chain partners are required to review the program annually or when a change has been made that is deemed significant. Signed copies of the Acknowledgement Form are maintained by the Purchasing Department. The Acknowledgement Form ensures that every contactor preforming work onsite has reviewed the Contactor Safety Program, completed the Contractor Safety Orientation, understands the consequences of not conforming to the Contractor Safety Program and that all questions have been answered by an Array employee. Success is measured by the number of value chain partners who have completed the contractor safety training and signed the Acknowledgement Form prior to commencing work onsite. This project was rolled out in late 2019, and our goal for 2022 is to have 100% of value chain members conducting work onsite sign this form. This is audited when they arrive at the facility. Upon arrival, the facilities manager or a designated project coordinator, greets them and ensures that the proper documentation has been completed.

# 4.0 Human Rights

This section of our COP addresses the following UNGC principles & SDGs:

<u>Principles 1</u>: Business should support and respect the protection of internationally proclaimed human rights

<u>Principle 2:</u> Make sure that they are not complicit in human rights abuses

<u>SDG 5:</u> Gender Equality

SDG 17: Peace, Justice and Strong Institutions



## 4.1. Commitment to Human Rights

Array is committed to creating and sustaining a workplace where all employees, value chain partners, contactors and visitors are treated with dignity and respect. This includes an environment that is free from discrimination and workplace harassment and violence, whether based on legislatively "Prohibited Grounds" (e.g. race, colour, ethnic origin, religion or creed, age, marital or family status, sex, sexual orientation, disability, etc.) or otherwise. By working together and giving the utmost attention to the safety and well-being of each other, we can meet our shared objective of a Respectful Work Environment for All. This commitment is clearly highlighted in our Respect in the Workplace Policy and Program and under the Human Rights section "Code", both of which are approved by the CEO. These policies and programs are designed to reflect Human Rights, Labour and Employment and Occupational Health and Safety Regulations, and have been developed in accordance with all applicable laws globally. The Respect in the Workplace Policy and Program and the Code applies to employees, visitors, contactors, value chain business partners, at all Array business locations, and Array endorsed activities, whether conducted on or off company premises. Workplace harassment or related issues will not be tolerated from any person in the workplace, including co-workers, customers, suppliers, supervisors, independent contractors, or members of the public. This information is shared with employee at time or hire and other stakeholders as required.

Array places the highest value on human rights and has had a zero tolerance for child, illegal, abusive and all forms of forced or compulsory labour and human trafficking anywhere in our operations or supply chains. As a company we do not employee anyone under the age of 15. We follow all applicable employment laws and pay competitive wages and benefits to those who work for the company. Additional information on this these topics can be found in the labour management section of this COP.

# 4.2 Human Rights Management System

Everyone has a role when it comes to the implementation and maintenance of the of the Human Rights Management System. The Human Resources (HR) Department is responsible for promoting awareness of the Respect in the Workplace Policy through ensuring all employees receive training. They also support leaders by providing consulting and advice to ensure the consistent application of this policy. Finally, when complainants are received, the HR Department is responsible for ensuring appropriate action is taken and investigations are conducted as required in accordance with section 2.3 of this report.



Employees are responsible for maintaining a respectful workplace environment and abiding to the Respect in the Workplace Policy & the Code. Part of this responsibility includes their participation in training and full cooperation in any investigation into alleged violations of these programs. The training provided on this policy outlines expectations for employees to conduct themselves in a respectful and appropriate manner through accepting responsibility for their actions, reactions and behavior and their impact to others. They are also expected to take every reasonable precaution to ensure the workplace remains free from violence and all forms of harassment.

Array's leaders have additional responsibility and training requirements beyond those of other employees. Leaders are responsible for creating and sustaining a respectful workplace environment through demonstrating appropriate behavior, as well as recognizing and immediately addressing any actions that offend, embarrass or humiliate others, whether deliberate or unintentional and take every reasonable precaution to protect employees. Through their training they are taught to take appropriate action in a prompt, impartial and confidential manner when issues are brought to their attention. They are trained that once the issue has been raised, they are required to engage the assistance of HR and fully cooperate in any investigation that takes place. Finally, in conjunction with the HR Department they are required to ensure that workplace violence and harassment assessments are conducted and procedures to address risks are developed where appropriate.

# 4.3 Human Rights Monitoring and Evaluation

At Array we are all responsible for promoting, monitoring and implementing our Respect in the Workplace Program and the Code. At Array, all employees have the right to report, in good faith, incidents of discrimination, harassment, violence or damage to property without fear of retaliation or reprisal. If an employee believes that they are in subject of an issue, the individual is urged to speak up, document and seek guidance from their manager. If they do not feel comfortable, they can contact the HR Department or anonymously report it to the Integrity Helpline.

Success of our program is measured by the number of complaints we receive and, upon investigation, how many were determined to have been violation of employee rights (human rights). In 2021, our investigations determined that there were zero violations of human rights at our facilities.

# 5.0 Labour Management

#### **ROBUST LABOUR MANAGEMENT POLICIES & PROCEDURES**

This section of our COP addresses the following UNGC Principles & SDGs:



<u>Principle 3:</u> Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

<u>Principle 4:</u> The elimination of all forms of forced and compulsory labour

Principle 5: The effective abolition of child labour

<u>Principle 6:</u> The elimination of discrimination in respect of employment and occupation

SDG 3: Good health and well-being

SDG 4: Quality Education

SDG 5: Gender Equality

SGD 8: Decent work and economic growth

SGD 16: Peace, Justice and Strong Institutions

<u>SDG 17</u>: Partnerships for the Goals

## 5.1 Labour

At Array employment is based on one's talent, ability and qualifications without discrimination based on race, national or ethnic origin, colour, religion, sex, age or marital status. To help employees understand our commitment to fair labour practices and relevant HR policies and programs we developed an Employee Handbook (Handbook). New hires are given a copy of this Handbook at the beginning on the onboarding process so they can familiarize themselves with information about the Company, Human Rights & Relations, Employment Guidelines, Fair & Competitive Wage, Salary Information, Vacation Time, Absence from Work, Workplace Harassment Policy, Business Conduct Policy, Benefit Program and reference to other relevant policies such as the Code, Respect in the Workplace Policy and the Health and Safety Program. It is important to note that all policies, procedures and activities comply with all applicable municipal, provincial and federal legislation and regulations and are developed in accordance with other relevant international labour standards. This commitment is highlighted in our Handbook as well as the Code.

Under the ERA Program, Array has developed a social inclusion initiative program known as DInA (Diversity and Inclusion at Array). This program focuses on providing employment to those facing social or economic hardships based on the identified groups. Figures 4a & 4b below highlights the six groups Array has identified and Figure 4c highlights the results. This program has currently been rolled out throughout our organization globally.



Figure 4a: Designated Groups targeted with the Diversity & Inclusion at Array program (DInA)

| Visible<br>Minorities  | Disclosed<br>Disabilities   | Women's<br>Empowerment   | Temporary<br>Work<br>Permit  | Vulnerable<br>Communities  | Maturing<br>Workforce   | Veterans  |
|--|---|--|--|--|---|---|
| Array provides work to individuals identified under all minorities as defined and recognized by Federal Governments or Government organizations for the countries in which we operate. | Array has disabilities management program. Through this program Array accommodates those with disclosed disabilities. | Array recognizes that at our facilities there is a low representation of women in technical positions. Through career planning and our Technical Skills Development Program, we hope to empower women to move into more technical roles. | Array provides work to those who are not Canadian Citizens or permanent residents. | Array aims to provide employment opportunities to those in communities that face economic or social disparities. | Array provides equal opportunity to employees of any age. Employees over 50 are considered to have a more difficult time finding meaningful employment. | Array aims to provide work to those who have designated veterans status with their government |

Figure 4a: Designated Groups targeted with the Diversity & Inclusion at Array program (DInA)

| DESIGNATED<br>GROUPS BY<br>LOCATION | DlnA                    | Visible<br>Minorities | Disclosed<br>Disabilities | Women<br>Empowerment | Temporary<br>Work Permit | Vulnerable<br>Communities | Maturing<br>Workforce |
|-------------------------------------|-------------------------|-----------------------|---------------------------|----------------------|--------------------------|---------------------------|-----------------------|
| Canada                              |                         | V                     |                           |                      | $\overline{\checkmark}$  |                           |                       |
| United<br>States                    | V                       |                       | V                         |                      |                          |                           | <b>V</b>              |
| Mexico                              | $\overline{\checkmark}$ |                       |                           |                      |                          |                           |                       |
| China                               | V                       |                       |                           |                      |                          |                           |                       |
| Europe                              | V                       | V                     | V                         |                      |                          | V                         | V                     |

Figure 4b: DInA projects by site.

NOTE: Checkmark means program has been fully implemented, open box means implementation is planned.

| КРІ   | 2021 RESULTS |
|---|--------------|
| Percentage of workers from minority groups and/or vulnerable workers employed in relation to the whole organization (if applicable) | 81%          |



| Percentage of workers from minority groups and/or vulnerable workers in top executive positions (excluding boards of directors) (if applicable) | 17% |
|---|-----|
| Percentage of women employed in relation to the whole organization  | 45% |
| Percentage of women in top executive positions (excluding board of directors)   | 13% |

Figure 4c: Workplace Diversity

## 5.2 Labour Management System

The HR Department maintains the Management System for Labour Principles and Practices. Annually, the VPHR works with the executive team to reaffirm Array's commitment to fair labour practices and adjusts current strategies to align with the HR objectives and goals for the upcoming year. They also participate in the risk assessment in section 2.2 focused on labour practices highlighted COP. This information is then shared with the HR Department where broader strategies are developed and then cascaded throughout the rest of the organization. The HR department is also responsible for reviewing all policies and programs on an annual basis and updating them accordingly while maintaining all tools required for an effective management system. Critical tools to their success include our payroll and employee information systems ADP and Industrios. In addition, personnel files are used to maintain records of facts and events associated with employees and their time at Array.

### 5.2.1 Employee Training

As an organization, Array is committed to training our team members at all levels to accomplish our objectives and for our overall success. We believe that our employees' productivity, potential and growth can only be achieved and maximized though effective training. We hope that all team members maintain the desire to learn, which will enable us to nurture continued growth for the organization and our employees.

Employee training begins as soon as they have been offered and accepted a position with Array. During the intake phase employees are provided with a copy of the Code and information about other essential HR programs and policies. They are also provided with a copy of their job description which



highlights the responsibilities for which they will be held accountable. When a new employee arrives at Array for their first day of work, they begin to receive job specific training from their manager and others within organization who have been identified as important to their success in their new role. During their probation period, employees will be required to attend orientation training where they will gain a more in-depth understanding on who Array is, our management team, the work we do and our vision, mission and values. This full day session also covers specific HR and employee programs and policies related to payroll & benefits, health and safety, sustainability, ethics and other mandatory training sessions they will need to participate in such as Respect in The Workplace.

We offer leadership development training; Agile training; technical training – e.g. AutoCAD, SolidWorks, excel, project management tools, sustainability; etc. We have also created intranet learning tools for continuous learning under "Array University', "Tools" and "Array Way" tabs.

All formal training provided by Array is tracked in our training database and all records and certificates of achievement are maintained in personnel files. In 2021, Array recorded 2577 training hours which is equivalent to 1.4 formal training hours per employee.

To further Array's commitment to supporting learning and development we provide an educational assistance program to employees who pursue continuous work-related knowledge or skills improvement. This also includes courses and workshops for employees who are maintaining relevant professional certifications, such as a Project Management Professional. Eligible employees include those who maintain a good overall standing and have completed their probationary period. Shall an employee choose to enroll in a program they must provide details to the HR Department for approval and will be reimbursed upon the completion of their course.

## 5.2.2 Health and Safety

#### **Health and Safety**

Starting in 2019, Array implemented an improved tool for assessing the risks correlated to one's position. This tool is referred to as our Hazard Identification and Risk Assessment (HIRA). The HIRA began at our facilities in Canada and the United States, and has since been extended to our facility in Mexico. There are plans to further extend the use of the tool in Europe starting in 2022. Array uses this tool to quantify the occupational hazards associated with each position. The implementation of this program creates a foundation for due diligence and methodology for ensuring we have taken all reasonable steps to identify and mitigate risks that our employees may

encounter in the course of their work. The HIRA allows us to identified risks in the following six hazard categories (not in order of importance): Biological, Chemical, Musculoskeletal Disorders, Physical,



Psychosocial, and Safety. Once activities in these categories have been identified, risk values are calculated based on the probability and severity of an incident if it were to occur. Each activity is evaluated based on its intrinsic risk (risk with no controls) and controlled risk (current controls). The risk values will fall into one of the four risk impacts categories: Low, Medium, High and Extreme. This information is used to develop our annual safety goals.

Beginning on the first day of work, and throughout their time at Array, employees are provided with information about Array's Health and Safety program. This global program has been developed in accordance with all applicable legislative requirements and provides critical information such as job hazards, Personal Protective Equipment (PPE) Policy and how to report an incident or injury.

Array has developed global safety incident definitions that are used to standardize reporting across all facilities. The definitions and results can be found in Figures 5a & 5b. When an employee has witnessed or experienced a Potential Failure or Injury, they are trained to notify their direct supervisor as soon as reasonably possible. Employees who have been injured are treated by a certified first aider, who will rely on their training to determine if external medical attention is required and respond accordingly. In this case, they are responsible for ensuring someone notifies the SRM department immediately. Once the employee has been treated, an Injury Report is completed. If an incident occurred where an employee was not hurt but had the potential to be injured, a Potential Failures Report is completed. Potential Failures and Injury reports are analyzed on a weekly basis and communications are provided accordingly. This information is shared with the site's health and safety committee.

Array's Safety Management System is aligned with the principles of ISO 45000 and based on the concept of an Internal Responsibility System (IRS). It is a system where everyone's job has direct responsibility for health and safety as an essential part of their job. This management system is guided by site specific safety committees. The safety committee is made up of a team of employees and management representatives who hold positions within each of the different production departments and shifts of the facility. These committees have been established in accordance with all applicable legislation and are responsible for conducting monthly workplace inspections of the facility. Issues raised during the inspection are recorded in the Action Item tracker and addressed immediately. All Action Items and outcomes from inspections are reviewed with the committee at the next safety meeting, which take place bi- monthly. During the meetings, serious incidents are reviewed along with department action items from the tracker, capital expenditures for safety upgrades, legal and compliance issues and any new business. Committee members are also safety resources for their

departments and involved with accident investigations, industrial hygiene testing, external inspections from regulating bodies and other activities related to the health and safety of workers at Array.



|                       | Definition  |  |
|-----------------------|---|--|
| Lost Time<br>Accident | Employee missed one or more shifts after the date of a workplace injury   |  |
| Recordable            | External professional medical care was sough for a workplace injury   |  |
| First Aid             | Aid Internal 1 <sup>st</sup> Aid was given for a workplace injury   |  |
| Potential Failures    | All incidents that did not result in an injury but had the potential to cause injury. Includes: near miss, property damage, and substandard acts and conditions |  |

Figure 5a: Incident Classification

| KPI                                      | FORMULA   | 2021<br>RESULTS |
|--|---|-----------------|
| Total Recordable Incident Rate (TRIR)    | [(Total number of recordable injuries) x 200,000 ]/ total hours worked                  | 2.29            |
| Lost Time Injury –<br>Frequency Rate for | (total number of lost time injury events) x 1,000,000 / total hours worked company-wide | 6.75            |
| direct workers                           | (number of days lost due to injuries) x 1,000,000 / total hours worked                  | 67.8            |

Figure 5b: Injury Frequency Rates

### 5.2 Labour Management Monitoring and Evaluation

The success of Array depends greatly upon the talent and performance of our team members. Employee appraisal is a valuable tool to recognize individual contributions to the company and to



discuss areas of growth and development. Performance reviews are completed by the employee's direct supervisor and rating are reviewed by the executive team.

When an employee joins Array, they are subjected to a three-month probationary period. At the end of this period an employee's performance is reviewed by their manager. This allows for the employee to receive feedback on their performance and clarify any questions concerning their position, company policies, practices and the benefits program. In addition to the probationary performance review, employees receive performance reviews on an annual basis during the Performance Review Cycle.

Employees receive a formal Performance Evaluation Appraisal during the annual Performance Review Cycle. This performance evaluation is delivered to an employee by their manager and is based on a fair and just assessment of an employee's job performance dependent upon their responsibilities and accountability. During this assessment process employees will receive one of the following ratings: Needs Improvement, Meets Expectations or Exceeds Expectations. Formal reviews are documented on a Performance Appraisal form and become a part of an employee's personal file. Employees also receive a copy of their performance review.

Another key measure of our labour management system is employee engagement and loyalty. Employee engagement and loyalty is evaluated based on the results from our Employee Net Promoter Score survey (eNPS). Bi-annually employees from all business divisions and facilities are encouraged to share their opinion on the likelihood of them recommending Array to a friend or colleague as a place to work and one thing the company could do to make it a better place to work. The results from this survey are used to develop key projects and strategies for the year. For the 2021 survey, which was completed in early 2021, Array received a score of -5, which is considered a good result. The feedback received during this survey is used by the HR department when building action plans to improve the employee experience. A global engagement pulse survey was issued in November 2021, and the global engagement factor had increased by 3.1% to 75.6%, demonstrating that the short-term actions to improve the employee experience were effective. Longer term actions continue to be implemented. The next survey is scheduled to be conducted in 2022. To further enhance our employee engagement, employee training plans are being developed and employee training hours will be tracked.

# 6.0 Environmental Management

#### **ROBUST ENVIRONMENTAL MANAGEMENT POLICIES & PROCEDURES**

This section of our COP addresses the following UNGC Principles and SDGs:



<u>Principle 7:</u> Businesses should support a precautionary approach to environmental challenges

<u>Principle 8:</u> Undertake initiatives to promote greater environmental responsibility

<u>Principle 9:</u> Encourage the development and diffusion of environmentally friendly technologies

SDG 12: Responsible consumption and production

SDG 13: Climate action

SDG 15: Life on land

### 6.1 Environmental Practices

The environment is one of Array's three key pillars of the ERA Program. This pillar reinforces our belief that we have a responsibility to protect the environment in which we operate, not only on a local scale but a global one as well. This commitment is also reinforced in our Safety and Sustainability Policy where Array has expressed our commitment to meeting and, where appropriate, exceeding all regulatory requirements related to the environment.

To truly understand our environmental impact, Array believes that we need to consider our operations and the impact associated with our products and services. To manage the impact of our onsite operations, we have implemented programs such as Environmental Impact and Aspect Listing, Hazardous Materials, Chemical Management, Spill Response, Waste Management and Energy Management. We have also addressed our value chain members by requiring them to comply with Array's Sustainable Procurement program. This program sets out the minimum environmental standards that they must follow. To address the impact associated with our products we have developed a Life Cycle Assessment (LCA). The LCA can be used to evaluate the environmental performance and impact of our products from the selection of raw materials to the displays end of life disposal practices. Along the pathway various decisions can be made to reduce the overall impact of the product. These decisions are guided by our ERA EcoDesign Principles which align with each of the LCA stages (Figure 6). Adherence to these principles is measured based on our ERA Scorecard, a tool used to assign an overall sustainability score and identify areas for environmental improvement. This information is communicated to clients on the Array Value Add document and brief documents.



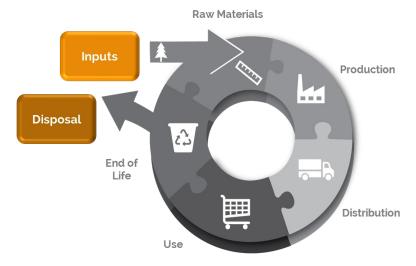


Figure 6: Array Product Life Cycle Assessment

# 6.2 Environmental Management System

Array's SRM department is responsible for the development, implementation and continuous improvement of the Environmental Management System (EMS). As our EMS evolves, we are working towards global consolidation across all Array sites and striving to align the system with the principles of ISO 14001. The foundation of this EMS is based on the identification of our Environmental Impacts and Aspects and the LCA discussed above. The Environmental Impact and Aspects listings allows us to identify risks associated with the environmental impact of our operations. This information recorded on department specific listing and determines a significance rating for each activity performed at Array. The significance rating is calculated by evaluating the total environmental impact, duration, scale, severity, and mitigation measures for each activity. Impacts are then addressed based on significance and risk level. As improvements are made to the system, they tracked in our Carbon Reduction Projects Tracker. The carbon footprint associated with each of these changes also calculated for our annual reporting.

Waste management is an integral component of minimizing the impact of our operations. Array focuses on the LCA and the Waste Minimization Hierarchy to move our operations towards a circular supply chain. The first principles in the Waste Hierarchy is reduce. We have reduced the overall waste from our operations though value engineering and ensuring that our products have been designed for manufacturing. Where possible Array strives to develop programs to reuse and recycle the waste produced from our manufacturing processes. In 2021, Array partnered with various members of our value chain to implement three new initiatives to shift towards a more circular economy with the materials used to make our Point of Sales (POS) systems. These projects focused on reusing the offcuts from our Machine Shop, Injection Molding and Vacforming departments and reworking them into new



raw materials. Another advantage of these programs is that they help to increase the recycled content in the materials we are using. Array has also developed other recycling streams for paper, cardboard, wood, plastic, containers, lighting and electronic waste. In 2022, we plan on carrying out a detailed waste audit to continue to identify opportunities and improve upon our recycling streams and decrease the amount of waste we are generating. We have also begun to partner with our clients and retailers to address the end of life of the units we produce for them. While evaluating the ERA EcoDesign Principles for a project, we include information about which pieces can be recycled and how, as well as information about specialized recycling programs.

In 2021, our European division introduced a new specialized recycling program in effort to further our contribution to circular production and create a closed loop system for our products. Through this program Array can recover our products at end of life from the retail environment and segregate them into their respective waste streams. Once parts have been properly sorted, they are reground and used as raw materials for new products. An example of the impact this program can be realized in a case study where Array collected 1000 mixed-material cosmetic bars with illuminated parts from retail locations located in the Netherlands and Belgium. Previously these displays would have been sent to landfill, but due to the implementation of this program Array was able to reuse and/or recycle 99.85% of the material used for these units.

Energy efficiencies and carbon reduction is another key area of focus. For our operations we are constantly looking for new ways to reduce our energy consumption, therefore generating less carbon emissions. Progress towards this goal included a capital expenditure project at Array Toronto to upgrade the existing lighting system in the manufacturing plant to LED. Additional energy efficiencies and carbon reduction efforts across our production facilities consist of building consolidations, heat recovery projects, solar panels, sustainable packaging solutions, transportation impacts and participation in Energy Demand Response programs. To track projects, we have developed a Carbon Reduction Projects Tracker. In this tracker we can highlight projects that are under investigation, to be implemented, in progress, implemented and not to be implemented. This tracker also allows us to calculate and include the carbon footprint associated with each initiative. Projects that have been implemented will also be reflected on our Impact and Aspects Tracker and related department listings.

Array also considers how we can improve the energy efficiency and reduce carbon emissions of our displays. When designing POS Systems Array follows our ERA EcoDesign principle Minimize Energy Consumption and Reduce Transportation Impacts. Minimizing Energy Consumption focuses on using the minimum number of electrical components to satisfy client requirements and proposing options



to eliminate all electrical elements. When electrical components are required, we ensure that we only use LEDs with a high lumen/watt ratio, utilize high power factor drivers and consider ways to control the electrical supply including tying the unit into the retailer's energy management systems. To further reduce carbon emissions, we have focused on the impacts associated with transportation. This looks at providing clients with options for local manufacturing and procuring raw materials from local vendors when possible. We also ensure that the optimize the weight of the display, we flat pack as many parts as possible and create custom packaging where applicable. Clients are provided with information related to these principles on the Array Value document.

Training is another fundamental part of our EMS. During the onboarding process, as discussed above, employees are provided with job specific training and notified of how to contact the SRM Department if they have any concerns or are seeking advice regarding Array's environmental impact. For operations employees, training includes information on where and how to properly dispose of materials, chemical management, when and how to properly turn off equipment, and the fundamentals of our ERA Program. The Commercial group is also trained on the fundamentals of ERA system and program specifics such as the ERA EcoDesign Principles & Scorecard. Employees receive ERA related training on an annual basis or when significant changes have been made. Array believes that as a part of our value proposition we have a duty to educate our clients on upcoming trends and how to improve the overall sustainability of their POS systems. This training is client specific and focuses on their ongoing or upcoming projects. In addition, this training gives us the opportunity to work closely with our clients to improve their overall sustainability performance and management systems.

# 6.3 Environmental Monitoring and Evaluation

Array has developed multiple methods for monitoring and evaluating our environmental performance. The overall effectiveness is measured by our scores for EcoVadis and Carbon Disclosure Project (CDP). Information about these KPI's can be found in Appendix B titled Empowering Responsibility at Array - Measures of Success. In addition to these third-party assessments, we have developed a variety of tools to track and analyze our environmental performance. All information including any incidents and updates on current and upcoming projects is shared at minimum on a quarterly basis with the executive team. This information is also communicated to the remainder of the organization at townhall meetings and through the Array Intranet.

The first tool that Array has developed is our Sustainability Compliance Calendar to effectively monitor and evaluate compliance to environmental regulations and expectations from our client. This program applies to all facilities and requires designated employees to maintain a site-specific list of their legal and reporting requirements for regulating bodies or clients. A corporate list is also maintained with



global KPI's and reporting deadlines. As new legislation is identified during our risk evaluations the calendar is updated accordingly. In 2021, Array reported zero incidents of local or accidental pollution and did not receive any fines.

Array has also developed a Sustainability Metrics Dashboard. This dashboard tracks our monthly electricity, natural gas, transportation, steam, water and fuel usage for all sites. Information for from this dashboard along with the Carbon Reduction Projects Tracker is used to feed our Greenhouse Gas Emissions Inventory and compile the footprint associated with our Scope 1, 2 and 3 emissions. This information is

then verified by an independent third party and used to complete our CDP reporting based on the Greenhouse Gas Protocol.

Waste is monitored through Array's Waste Management Program. Under this program Array has developed a tracker that identifies all waste vendors and streams. We believe it is important to work closely with our waste vendors to properly monitor and track the materials we dispose of and their associated streams. All information is compiled in our Waste Management Tracker and Array is able identify new initiatives that can be implemented to minimize, reuse and/or recycle the waste generated from our operations.

Finally, Array can assess the value that we provide to our clients by continually monitoring our relationships with them. This is done through regular check-in and during business reviews. Any feedback that they provide to us is considered and incorporated into our systems as applicable. We also provide our clients with updates on our sustainability performance through sharing our annual scores for EcoVadis and CDP. See section 8.0 Empowering Responsibility at Array Measures of Success below for additional details.

Information on the monitoring and improvement of the environmental performance of partners in our supply chain can be found in Section 3, Value Chain Members.

| Scope 1<br>(tCO2eq.) | Scope 2<br>(Location)<br>(tCO2eq.) | Scope 2<br>(Market)<br>(tCO2eq.) | Scope 3<br>(Business Travel)<br>(tCO2eq.) |
|----------------------|------------------------------------|----------------------------------|---|
| 2,265.53             | 3,762.68                           | 0                                | 236.61                                    |

Figure 7: GHG Emissions Tracker



# 7.0 Anti-Corruption

#### **ROBUST ANTI-CORRUPTION MANAGEMENT POLICIES & PROCEDURES**

This section of our COP addresses the following UNGC Principle and SDGs:

<u>Principle 10:</u> Businesses should work against corruption in all its forms, including extortion and bribery

SDG 12: Responsible consumption and production

SDG 16: Peace, justice and strong institutions

SDG 17: Partnerships for the goals

### 7.1 Anti-Corruption Practices

Array believes we need to be a responsible global citizen in the way we conduct our business. For over 35 years, Array has demonstrated an unwavering commitment to performance and integrity, through each of us taking the right actions and making the right decisions every day. Array is also committed to maintaining compliance with all relevant anti-corruption laws. To maintain these commitments Array has developed the Code, which provides a foundation for how we conduct ourselves as a company and as individuals representing the company. The Code applies to Array and its direct or indirect subsidiaries and controlled affiliates and their directors, officers, and full and temporary employees worldwide. In addition, the Code acts as a guide for ensuring that Array conducts business with sound business practices and fostering relationships and trust with its employees, commercial partners, shareholders and government authorities. Our conduct impacts our reputation, public confidence in our business decisions and our financial strength. At Array we understand that every action we take reflects on us, our value and our character. At our core, we are in business to earn a fair return for our shareholder, but we will not compromise on integrity. We must use our company's assets wisely and we must deliver on our promises to our customers, our partners and our people. These are the ethics that guide our conduct and decisions.

Array has zero-tolerance for corruption within our business and value chain. The Code we have developed and implemented demonstrates our commitment to the prevention of anti-corruption and provides practical guidance and strategies for employees in many situations that may occur in the business context. Employees are trained to never offer, promise, authorize, make, solicit or accept bribes, kickbacks or any other improper payment regardless of local practice or perceived custom. They can also find information about the types of corruption that exist, how to avoid conflicts of interest,



honor business obligations, treat people with dignity and respect and protect company information, assets and interests.

The Code also highlights Array's practices for conducting business in areas that are high-risk for corruption and the partners we choose to do business with. It is for these reasons that prior to engaging in business or relationships with new customers, suppliers or external parties, employees are responsible for ensuring that their planned activities do not involve a restricted country or party. A list of restricted countries and parties is maintained by the CFO based on the guidance the Global

Canadian Affairs and US Department of the Treasury. The CFO is also responsible for maintaining the list of restricted parties. This list is updated according to the U.S Department of Commerce, U.S. Department of State, U.S. Department of Treasury, Canadian Government and the European Union. The list of restricted parties includes economic sanctions laws that restrict the dealings with various individuals and entities located around the world, such as certain government officials, government agencies, state-owned entities, terrorists and drug traffickers. If employees have questions or concerns about whether a customer, supplier or External Intermediary should be screened they are to contact the CFO.

## 7.2 Anti-Corruption Management System

The Code is maintained and implemented by the HR Department. On an annual basis they work with the Executive team to review and reaffirm the Code. The Executive team is also responsible for participating in the Risk Assessment Process discussed Section 2 of this COP to determine potential areas of corruption. The CFO has an additional responsibility of maintaining the list of restricted countries or parties and organizing and participating in external 3<sup>rd</sup> party audits of our financial practices to ensure the prevention of anti-corruption.

Leaders, managers and supervisors are responsible for creating a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation; encourage ethical conduct and compliance with the law by personal leading compliance efforts; consider compliance efforts when evaluating and rewarding employees and ensure that employees understand that business results are never more important that ethical conduct and compliance with Array policies. Employees are expected to contribute to Array's culture of compliance by understanding Array's policies, embracing Array's commitment to integrity, acting to enforce compliance and avoiding violations. Employees are also expected to prevent, detect and respond to compliance issues and raise concerns.



Employees at Array are responsible for reporting in good faith any and all potential violations of laws, regulations, policies or procedures including and especially complaints as to accounting or auditing irregularities or fraud and corruption. Employees are given multiple avenues for reporting violations to the Code such as discussing the issue with the manager, contacting human resources or reporting it anonymously through Array's Integrity Helpline, which is available 24 hours a day, 7 days a week. Every report of a violation to Array's Code is taken seriously and investigated promptly in a discreet and professional manner. Array will not retaliate against any person who in good faith raises and ethics or compliance issue through the proper channels. Individuals who raise concerns or helps us resolve

reported matters are protected against retaliation. Discouraging other employees from reporting or getting the help they need is prohibited and could result in disciplinary action. Violations of laws, regulations, the Code or our policies and procedures can have severe consequences for employees and the company. Some violations may be criminal in nature and punishable by fine or imprisonment. Violations can jeopardize our relationships with our customers and suppliers and could result in loss of the privilege to do business in countries where we operate.

### 7.3 Anti-Corruption Monitoring and Evaluation

At Array, everyone is responsible for promoting, monitoring and implementing the Code. As part of the onboarding process employees are required to review the Code and confirm that they understand it. This is part of the onboarding checklist and copies of signed documents are maintained in employee files.

The Integrity Helpline is monitored by a third-party service provider. All reports to the Integrity Helpline are reported to the VPHR or to General Counsel if it is not appropriate to involve the VPHR. Every report to the Integrity Helpline is handled promptly, discretely and professionally. All reports made in good faith will be treated seriously and following investigation will be resolved appropriately. The VPHR or General Counsel determine who will conduct the investigation. All cases involving criminal activity are reported to the appropriate authorities.

The effectiveness of our Anti-Corruption and Whistle Blowing practices are measured through our, internal audit process and validated by our EcoVadis score. In 2021, we did not have any confirmed violations of our Code of Conduct and Business Ethics. Further information on these measures can be found in the section below titled "Empowering Responsibility at Array Measures of Success.



# 8.0 Empowering Responsibility at Array Measures of Success

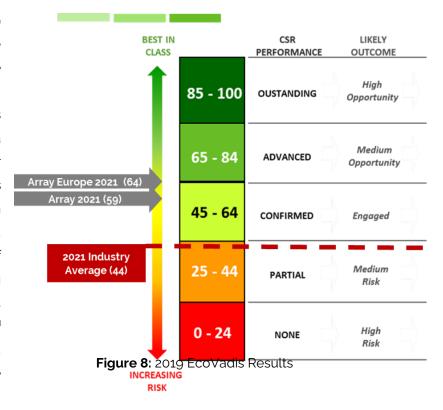
Array has adopted measures to evaluate the success of the policies, programs and practices we have implemented. These measures of success include our scores for EcoVadis and CDP, both of which are external evaluations of our systems in place.

### 8.1 EcoVadis

EcoVadis is an objective third party assessment that Array uses to evaluate our CSR management system. Performance is assessed based on size of the organization/division, industry, sector and countries of operations and proof of polices, actions and reporting on the following four categories: Environment, Labour & Human Rights, Ethics and Sustainable Procurement. Organizations are required to upload evidence that supports the quality of their management system into an online portal. After all documentation has been uploaded, EcoVadis analysts evaluate the organizations performance based on their methodology. Once evaluation is completed organizations receive a score that is valid for one year. In addition, organizations will receive a list of strengths and areas for improvement to ensure continuous improvement of the systems in place.

Array has actively been reporting to EcoVadis since 2015. Results are summarized in Figure 8 below.

In 2021, Array received a score of 59 earning a Sliver Sustainability Rating badge based on our industry and size. The average for this group is a score of 44, placing Array in the 83rd percentile. It is important to note that Array is scored as a large size enterprise based on our headcount and revenue. This score covers all Array locations, except Europe; Willson and Brown reports independently. In 2021, Willson & Brown was awarded a score of 64, earning a silver Sustainability Rating badge based on their size and industry. Their results placed them in the 93rd percentile of companies audited around the world and have earned a score more than 20 points above their sector average.



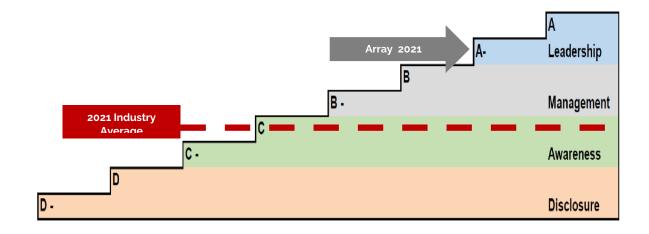


### 8.2 Carbon Disclosure Project

In addition to EcoVadis, Array also uses CDP to evaluate our CSR Management System, for all of our business divisions globally. CDP is a third party assessment aimed at evaluating a company's effective management of carbon and climate change risk. Companies respond to CDP by answering a series of questions related the following categories: Governance, Business & Financial Planning, Risk Management Process, Opportunity & Risk Disclosure, Value Chain Engagement, Targets, Scope 1, 2, & 3 Emissions, Energy and Emissions Reduction Initiatives. Reponses are assessed and company will be assigned a score in the Disclosure, Awareness, Management or Leadership band.

Array has been an active participant of CDP since 2016. For the last few years, we have maintained an awareness level rating. Through 2021, Array maintained our score of "A-" in the Leadership band (see **Figure 9** below). This places Array in the top 12% of companies globally, and far exceeds the 2021 industry average of "C". These results

Figure 9: 2021 CDP Results



## TAKING ACTION IN SUPPORT OF BROADER UNITED NATIONS GOALS AND ISSUES

Array has a long history of supporting the communities in which we operate. For over 10 years we have made contributions to non-profits including the American Cancer Society, Canadian Cancer Society, the Breast Cancer Research Foundation, Make a Wish Foundation, UNICEF, Look Good Feel Better and DKMS. In lieu of gifts for clients we also donate money on their behalf to these groups.

array

Every year Array employees are also engaged in charity event called Noble Gift, a nationwide project that in 2021 provided material and emotional support to more than 17 000 families that were experiencing difficulties. Array is involved in collecting and wrapping gifts that support the direct needs of families. We provide food, home appliances, furniture, toys, clothes and many more so that every member of the family can enjoy Christmas equally.

Additionally, Array has built strong partnerships with various Educational Care Centers that take young adults from vulnerable communities and orphanages and provide services including guidance for career building, future opportunities, and talent exploration. These are achieved through a variety of events, internships and workshops with numerous departments.

In order to increase the number of beneficiaries in our Senior Workers designated group under our DinA program, Array has partnered with a regional labour office in Poland. Through our partnership with this local labour office, Array has hired additional workers over the age of 50 and provided them with meaningful employment.

Our Poland facility also supports the employment of Ukrainians by providing them with meaningful work and covers all the expenses associated with permits required for them to stay in Poland. This is done with support of Array HR and Legal departments. Without this assistance from Array, many of these individuals would not be able to obtain work within Poland.

To reinforce these community connections and improve upon our ERA Programs, we have recently established a Community Committee. This employee-driven committee is tasked with assisting in the creation, implementation and continuous improvement of our social responsibility strategy. The committee is a cross-function group with representation from all business units within the organization who is focused on aligning our social responsibility strategy with our business strategy. They work together to create recommendations for the adoption of sustainable programs, policies and strategies to reduce Array's environmental impact (inclusive of carbon emissions). They can make a positive impact on Array's overall CSR performance though increasing employee awareness and education, creating a culture of CSR, and understanding external trends related to our three pillars. They are also



charged with encouraging and involving colleagues to make meaningful contributions to our environment and/or community.

Array's SRM team also has 2 positions as board members on the Canadian Society of Safety Engineers (CSSE) – Sustainability Committee. This trade association is comprised of safety professionals, and the

Sustainability Committee is a subset of the organization whose mandate is specifically focused on engaging corporations, promoting research and influencing policy related to sustainability practices. Specifically, the collective position is that Human Capital and Sustainability should go hand-in hand. This committee meets monthly and has further connections to other trade groups globally; including the Center for Safety & Health Sustainability, and the Institution for Safety and Health. We partner with large organizations globally to influence the policies and actions taken to reduce the impact of climate change on the future success of organizations. The Array SRM team represents 14% of the committee composition. We also have a significant impact on the groups position, as we represent the only organization that has merged Human Capital with other sustainability initiatives, helping to ensure a holistic approach to sustainability. Through sharing our best practices, we can influence the committee's ability to provide value to other members of the CSSE professional association.

### APPENDIX A: GRI REQUIREMENTS

| GRI<br>Requirement                                      | Details of Requirement   | Array's Commitment                         |  |  |  |  |
|---|--|--|--|--|--|--|
| G4 Profile Disc   | G4 Profile Disclosures: Strategy and Analysis  |  |  |  |  |  |
| G4-1  | Provide a statement from the most senior decision-maker of the organization about the relevancy of sustainability to the organization and the organizations strategy for addressing sustainability | Statement from Chief<br>Executive Officers |  |  |  |  |
| G4-2  | Provide description of key impacts, risks and opportunities.   | Not disclosed in this report.              |  |  |  |  |
| G4 General Standard Disclosures: Organizational Profile |  |  |  |  |  |  |
| G4-3  | Report name of Organization  | Section 1: About this<br>Document          |  |  |  |  |



|       | T  |                               |
|-------|--|-------------------------------|
| G4-4  | Report primary brands, products and services   | Section 2: Our Company        |
| G4-5  | Report the location of the organizations headquarters  | Section 2: Our Company        |
| G4-6  | Report the number of countries where the organization operates, names of counties where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report  | Section 2: Our Company        |
| G4-7  | Report the nature of ownership and legal form  | Section 2: Our Company        |
| G4-8  | Report the markets served (including geographic breakdown, sectors served, and types of customers and beneficiaries  | Section 2: Our Company        |
| G4-9  | Report the scale of the operations   | Section 2: Our Company        |
| G4-10 | <ul> <li>A) Report the total number of employees by employment contract and gender</li> <li>B) Report the total number of permanent employees by type and gender</li> <li>C) Report the total workforce by employees and supervised workers by gender</li> <li>D) Report the total workforce by region and gender</li> <li>E) Report whether a substantial portion of the organization's work is performed by workers who are legally recognized as self-employed, or by individuals other than employees or supervised workers, including employees and who are supervised employees of contactors</li> <li>F) Report any significant variations in employment numbers (such as seasonal variations)</li> </ul> | Not disclosed in this report. |
| G4-11 | Report the percentage of total employees covered by collective bargaining agreements   | Not disclosed in this report. |
| G4-12 | Describe the organizations supply chain  | Not disclosed in this report. |
| G-13  | Report any significant changes during the reporting period regarding the organizations size, structure, ownership or its supply chain  | Section 2.1: Governance       |



| G4-28          | Reporting period (such as fiscal or calendar year) for information provide  | Section 1: About this<br>Document |
|----------------|---|-----------------------------------|
| G4-29          | Date of most recent previous report (if any)  | Section 1: About this<br>Document |
| G4-30          | Reporting cycle (such as annual, biennial)  | Section 1: About this<br>Document |
| G4-31          | Provide the contact point for questions regarding the report or its contents  | Section 1: About this<br>Document |
| G4-32          | A) Report the 'in accordance' option the organization has chosen     B) Report the GRI Content Index for the chosen option (See tables in G4)     C) Report the reference to External Assurance Report, if the report has been externally assured. GRI recommends the use of external assurance but it is not a required to be 'in accordance' with Guidelines  | Section 1: About this<br>Document |
| G4 General Sta | ndard Disclosures: Assurance  |                                   |
| G4-33          | A) Report the organizations policy and current practices with regard to seeking external assurance for the report  B) If not included the assurance report accompanying the sustainability report, report the score and the basis of any external assurance provided  C) Report the relationship between the organization and the assurance providers  D) Report whether the highest governance body or senior executives are involved in seeking assurance providers | Section 2.1: Governance           |
| G4 General Sta | ndard Disclosures: Governance   |                                   |
| G4-34          | Report the governance structure of the organization, including committees of the highest governance body. Identify any committees responsible for the decision-making on economic, environmental or social impacts  | Section 2.1 Governance            |
| G4-35          | Report the process for delegating authority for economic, environmental and social topics from the highest governance body to the senior executives and other employees   | Section 2.1: Governance           |



| G4-36 | Report whether the organization has appointed<br>an executive level position or positions with<br>responsibility for economic, environmental, or<br>social topics, and whether post holder report<br>directly to the highest governance body   | Section 2.1: Governance       |
|-------|--|-------------------------------|
| G4-37 | Report Processes for consultation between<br>stakeholders and the highest governance<br>body on economic, environmental and social<br>topics. If consultation is delegated, describe to<br>whom and any feedback processes to the<br>highest governance body   | Section 2.1: Governance       |
| G4-38 | Report the composition of the highest governance body and its committees   | Section 2.1: Governance       |
| G4-39 | Report whether the Chair of the highest<br>governance body is also an executive officer<br>(and if so, his or her function within the<br>organizations management and the reasons of<br>this arrangement)  | Section 2.1: Governance       |
| G4-40 | Report the nomination and selection process<br>for the highest governance body and its<br>committees, and the criteria used for<br>nominating and selecting highest governance<br>body members   | Not disclosed in this report. |
| G4-41 | Report processes for the highest governance<br>body to ensure conflicts of interest are avoided<br>and managed. Report whether conflicts of<br>interest are disclosed to stakeholders  | Not disclosed in this report. |
| G4-42 | Reporting the highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental and social impacts  | Not disclosed in this report. |
| G4-43 | Report the measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental and social topics   | Not disclosed in this report. |
| G4-44 | A) Report the processes for evaluation of the highest governance body's performance with respect to governance of economic, environmental and social topics. Report whether such evaluation is independent or not, and its frequency. Report whether such evaluation is a self-assessment      B) Report actions taken in response to evaluation of the highest governance | Not disclosed in this report. |

|       | body's performance with respect to governance of economic, environmental and social topics, including, as a minimum, changes in membership and organizational practice  |                               |
|-------|---|-------------------------------|
| G4-45 | A) Report the highest governance body's role in the identification and management of economic, environmental and social impacts, risks, and opportunities. Include the highest governance body's role in the implementation of due diligence processes  B) Report whether stakeholder consultation is used to support the highest governance body's identification and management of economic, environmental and social impacts, risks, and opportunities | Section 2.1: Governance       |
| G4-46 | Report the highest governance body's role in reviewing the effectiveness of the organization's risk management processes for economic, environmental and social topics  | Section 2.1: Governance       |
| G4-47 | Report the frequency of the highest governance body's review of economic, environmental and social impacts, risks, and opportunities  | Section 2.1: Governance       |
| G4-48 | Report the highest committee or position that formally reviews and approves the organization's sustainability report and ensures that all material Aspects are covered  | Not disclosed in this report. |
| G4-49 | Report the process for communicating critical concerns to the highest governance body   | Section 2.1: Governance       |
| G4-50 | Report the nature and total number of critical concerns that were communicated to the highest governance body and the mechanism(s) used to address and resolve them   | Section 2.1: Governance       |
| G4-51 | A) Report the remuneration policies for the highest governance body and senior executives     B) Report how performance criteria in the remuneration policy relate to the highest governance body's and senior  | Not disclosed in this report. |



|                |   | T                                 |
|----------------|---|-----------------------------------|
|                | executives' economic, environmental and social objectives   |                                   |
| G4-52          | Report the process for determining remuneration. Report whether remuneration consultants are involved in determining remuneration and whether they are independent of management. Report any other relationships which the remuneration consultants have with the organization                              | Not disclosed in this report.     |
| G4-53          | Report how stakeholders' views are sought<br>and taken into account regarding<br>remuneration, including the results of votes on<br>remuneration policies and proposals, if<br>applicable   | Not disclosed in this report.     |
| G4-54          | Report the ratio of the annual total compensation for the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country  | Not disclosed in this report.     |
| G4-55          | Report the ratio of percentage increase in annual total compensation for the organization's highest- paid individual in each country of significant operations to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual) in the same country | Not disclosed in this report.     |
| G4 General Sta | andard Disclosures: Stakeholder Engagement  |                                   |
| G4-24          | Provide a list of stakeholder groups engaged by the organization  | Section 3: Value Chain<br>Members |
| G4-25          | Report the basis for identification and selection of stakeholders with whom to engage   | Section 3: Value Chain<br>Members |
| G4-26          | Report the organization's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process  | Section 3: Value Chain<br>Members |
| G4-27          | Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns, including through its reporting  | Section 3: Value Chain<br>Members |



| Principle 1: Human Rights Businesses should support and respect the protection of internationally proclaimed human rights                          |  |                                   |  |
|--|--|-----------------------------------|--|
| G4-HR2   | Total hours of employees training on human rights policies or procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained | Section 4: Human Rights           |  |
| G4-HR7   | Percentage of security personnel trained in<br>the organizations human rights policies or<br>procedures that are relevant to the<br>organization   | Not applicable.                   |  |
| G4-HR8   | Total number of incidents of violations involving rights of indigenous peoples and actions taken   | Section 4: Human Rights           |  |
| G4-HR9   | Total number and percentage of operations that have been subject to human rights reviews or impact assessments   | Section 4: Human Rights           |  |
| G4-HR12  | Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms   | Section 4: Human Rights           |  |
| G4-S01   | Percentage of operations with implemented local community engagement, impact assessments and development programs  | Section 4: Human Rights           |  |
| G4-S02   | Operations with significant actual or potential negative impacts on local communities  | Section 4: Human Rights           |  |
| -  | Principle 2: Human Rights Business should make sure that they are not complicit in human rights abuses   |                                   |  |
| G4-HR1   | Total number and percentage of significant investment and agreements and contacts that include human rights clauses or that underwent human rights screenings                              |                                   |  |
| G4-HR10  | Percentage of new suppliers that were screening using human rights criteria  | Section 3: Value Chain<br>Members |  |
| G4-HR11  | Significant actual and potential negative human rights impacts in the supply chain and actions taken   | Section 4: Human Rights           |  |
| Principle 3: Labour<br>Businesses should uphold the freedom of association and the effective recognition of<br>the rights to collective bargaining |  |                                   |  |
| G4-11  | Report the percentage of total employees covered by collective bargaining agreements   | Not disclosed in this report.     |  |



| G4-HR4  | Operations and suppliers identified in which<br>the right to exercise freedom of association<br>and collective bargaining may be violated or<br>at significant risk and measures taken to<br>support these rights  | Not disclosed in this report.   |  |
|---|--|---------------------------------|--|
| G4-LA4:   | Minimum notice periods regarding operational changes, including whether they are specified in collective agreements  | Not disclosed in this report.   |  |
| Principle 4: Lak<br>Business should   | oour<br>d uphold the elimination of all forms of forced ar   | nd compulsory labour            |  |
| G4-HR6  | Operations and suppliers identified as having significant risk for incidents of forced and compulsory labour, and measures to continue to the elimination of all forms of forced or compulsory labour  | Section 5: Labour<br>Management |  |
| Principle 5: Lab<br>Businesses sho  | uld uphold the effective abolition of child labour   |                                 |  |
| G4-HR5  | Operations and suppliers identified as having significant risk for incidents of child labour and measures taken to contribute to the effective abolition of child labour   | Section 5: Labour<br>Management |  |
| Principle 6: Labour  Business should uphold the elimination of discrimination in respect of employment and occupation |  |                                 |  |
| G4-10   | <ul> <li>A) Report the total number of employees by employment contract and gender</li> <li>B) Report the total number of permanent employees by type and gender</li> <li>C) Report the total workforce by employees and supervised workers by gender</li> <li>D) Report the total workforce by region and gender</li> <li>E) Report whether a substantial portion of the organization's work is performed by workers who are legally recognized as self-employed, or by individuals other than employees or supervised workers, including employees and who are supervised employees of contactors</li> <li>F) Report any significant variations in employment numbers (such as seasonal variations)</li> </ul> | Section 5: Labour<br>Management |  |
| G4-EC5  | Rations of standard entry level wages by gender compared to local minimum wage as significant locations of operation   | Not disclosed in this report.   |  |



| G4-EC6  | Proportion of senior management hired from<br>the local community at significant locations of<br>operations   | Not disclosed in this report.             |  |
|---------|---|---|--|
| G4-LA1  | Total number rates of new employee hired and employee turnover by age group, gender and region  | Not disclosed in this report.             |  |
| G4-LA3  | Return to work and retention rates after parental leave, by gender  | Not disclosed in this report.             |  |
| GA-LA9  | Average hours of training per year per employee by gender and employee category   | Not disclosed in this report.             |  |
| GA-LA11 | Percentage of employees receiving regular performance and career development reviews by gender and by employee category   | Not disclosed in this report.             |  |
| GA-LA12 | Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership and other indicators of diversity | Not disclosed in this report.             |  |
| GA-LA13 | Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operations   | Not disclosed in this report.             |  |
| G4-HR3: | Total number of incidents of discrimination and corrective actions taken  | Section 5: Labour<br>Management           |  |
| -       | Principle 7: Environment  Businesses should support a precautionary approach with environmental challenges  |   |  |
| G4-EN2  | Financial implications and other risks and opportunities for the organizations activities due to climate change   | Not disclosed in this report.             |  |
| G4-EN1  | Materials used by weight or volume  | Currently not tracked.                    |  |
| G4-EN3  | Energy consumption within the organization  | Section 6:<br>Environmental<br>Management |  |
| G4-EN8  | Total water withdrawal by source  | Not disclosed in this report.             |  |
| G4-EN15 | Direct Greenhouse Gas Emissions (Scope 1)   | Section 6:<br>Environmental<br>Management |  |
| G4-EN16 | Energy indirect Greenhouse Gas Emissions (Scope 2)  | Section 6:<br>Environmental<br>Management |  |
| G4-EN17 | Other indirect Greenhouse Gas Emissions (Scope 3)   | Section 6:<br>Environmental<br>Management |  |



| G4-EN20                            | Emissions of ozone depleting substances  | Not disclosed in this report.             |
|------------------------------------|--|---|
| G4-EN21                            | NOX, SOX and other significant air emissions   | Not disclosed in this report.             |
| G4-EN27                            | Extent of impact mitigation of environmental impacts of products and services  | Not disclosed in this report.             |
| G4-EN31                            | Total environmental protection expenditures and investments by type  | Not disclosed in this report.             |
| Principle 8: Env<br>Businesses sho | vironment<br>uld undertake initiatives to promote greater envi   | ironmental responsibility                 |
| G4-EN1                             | Materials used by weight or volume   | Not disclosed in this report.             |
| G4-EN2                             | Financial implications and other risks and opportunities for the organizations activities due to climate change  | Not disclosed in this report.             |
| G4-EN3                             | Energy consumption within the organization   | Section 6:<br>Environmental<br>Management |
| G4-EN5                             | Energy Intensity   | Not disclosed in this report.             |
| G4-EN6                             | Reduction of energy consumption  | Section 6:<br>Environmental<br>Management |
| G4-EN7                             | Reductions in energy requirements of products and services   | Section 6:<br>Environmental<br>Management |
| G4-EN8                             | Total water withdrawal by source   | Not disclosed in this report.             |
| G4-EN9                             | Water sources significantly affected by withdrawal of water  | Not disclosed in this report.             |
| G4-EN10                            | Percentage of total volume of water recycled and reused  | Not disclosed in this report.             |
| G4-EN11                            | Operational sites owned, leased, managed in or adjacent to protected areas and areas of high biodiversity value outside of protected areas                                 | Not applicable.                           |
| G4-EN12                            | Description of significant impact of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside of protected areas | Not applicable.                           |
| G4-EN13                            | Habitats protected of restored   | Not applicable.                           |
| G4-EN14                            | Total number of IUCN Red List Species and national conservation list species with habitats   | Not applicable.                           |



|          | in areas affected by operations, by level of extinction risk   |   |
|----------|--|---|
| G4-EN15  | Direct Greenhouse Gas Emissions (Scope 1)  | Section 6:<br>Environmental<br>Management |
| G4-EN16  | Energy indirect Greenhouse Gas Emissions (Scope 2)   | Section 6:<br>Environmental<br>Management |
| G4-EN 17 | Other indirect Greenhouse Gas Emissions (Scope 3)  | Section 6:<br>Environmental<br>Management |
| G4-EN18  | Greenhouse gas emissions intensity   | Section 6:<br>Environmental<br>Management |
| G4-EN19  | Reduction of greenhouse gas emissions  | Section 6:<br>Environmental<br>Management |
| G4-EN20  | Emissions of ozone depleting substances  | Not disclosed in this report.             |
| G4-EN21  | NOX, SOX and other significant air emissions   | Not disclosed in this report.             |
| G4-EN22  | Total water discharge by quality and destination   | Not disclosed in this report.             |
| G4-EN23  | Total weight of waste by type and disposal method  | Not disclosed in this report.             |
| G4-EN24  | Total number and volume of significant spills  | Section 6:<br>Environmental<br>Management |
| G4-EN25  | Weight of transported, imported, exported or treated waste deemed hazardous under the terms of the Basel Convention2, Annex I, II, III and VII and percentage of transported waste shipped internationally | Not disclosed in this report.             |
| G4-EN26  | Identify, size, protected status and biodiversity value of water bodies and related habitats significantly affected by the organizations discharges of water and runoff                                    | Not disclosed in this report.             |
| G4-EN27  | Extent of impact mitigation of environmental impacts of products and services  | Not disclosed in this report.             |
| G4-EN28  | Percentage of products sold and their packaging materials that are reclaimed by category   | Not disclosed in this report.             |
| G4-EN29  | Monetary value of significant fines and total<br>number of non-monetary sanctions for non-<br>compliance with environmental laws and<br>regulations  | Section 6:<br>Environmental<br>Management |



| G4-EN30   | Significant environmental impacts of transporting products and other goods and materials from organization's operations and transporting members of the workforce  | Not disclosed in this report.             |  |
|---|--|---|--|
| G4-EN31   | Total environmental protection expenditures and investments by type  | Not disclosed in this report.             |  |
| G4-EN32   | Percentage of new suppliers that were screened using environmental criteria  | Section 3: Value Chain<br>Members         |  |
| G4-EN33   | Significant actual and potential negative environmental impacts in the supply chain and actions taken  | Not disclosed in this report.             |  |
| G4-EN34   | Number of grievances about environmental impacts filed, addressed and resolved through formal grievance mechanisms   | Section 6:<br>Environmental<br>Management |  |
|   | Principle 9: Environment Businesses should encourage the development and diffusion of environmentally friendly   |   |  |
| G4-EN6  | Reduction of energy consumption  | Section 6:<br>Environmental<br>Management |  |
| G4-EN7  | Reduction in energy requirements of products and services  | Section 6:<br>Environmental<br>Management |  |
| G4-EN19   | Reduction of greenhouse gas emissions  | Section 6:<br>Environmental<br>Management |  |
| G4-EN27   | Extent of impact mitigation of environmental impacts of products and services  | Section 6:<br>Environmental<br>Management |  |
| G4-EN31   | Total environmental protection expenditures and investments by type  | Not disclosed in this report.             |  |
| Principle 10: Anti-corruption Businesses should work against corruption in all its forms, including extortion and bribery |  |   |  |
| G4-56   | Describe the organization's values, principle, standards and norms of behavior such as code of conduct and codes of ethics   | Section 7: Anti-<br>Corruption            |  |
| G4-57   | Report the internal and external mechanisms for seeking advice on ethical and lawful behavior and matters related to organizational integrity such as helplines or advice lines  | Section 7: Anti-<br>Corruption            |  |
| G4-58   | Report the internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and matters related to organizational integrity, such as escalation throughout line management, whistleblowing mechanisms or hotlines | Section 7: Anti-<br>Corruption            |  |



| G4-S03 | Total number and percentage of operations assessed for risks related to corruption and the significant risks identified | Section 7: Anti-<br>Corruption |
|--------|---|--------------------------------|
| G4-S04 | Communication and training on anti-corruption policies and procedures   | Section 7: Anti-<br>Corruption |
| G4-S05 | Confirmed incidents of corruption and action taken  | Section 7: Anti-<br>Corruption |
| G4-S06 | Total value of political contributions by country and recipient/beneficiary   | Not disclosed in this report.  |