



Responsible Sourcing Policy

NUDURA Inc. is part of the Tremco CPG group, under RPM's leadership, and in this context adheres to the group's policies highlighted below that go hand in hand with Responsible Sourcing principles.

This policy applies to all NUDURA Inc. employees engaged in purchasing and sourcing activities that impacts the Granby, QC site. It applies also to consultants, contractors, and agency staff in relation to their work for, or on behalf of, NUDURA Inc. The purpose of this policy is to set out the key elements and principles of global sourcing. The key principles governing all NUDURA Inc. purchasing activities, in particular sourcing of finished goods and raw materials, in a compliant and responsible way, and in a way that is consistent with [RPM's Code of Conduct and values](#).

NUDURA Inc. sources components, materials, and services locally. We therefore recognise that our supply chain activities have a limited impact, with our responsibilities extending beyond our own operations, and into those of our suppliers. We also recognise that there are local and national differences in standards in relation to many aspects of a supplier's business, however there are several minimum standards that must be achieved by all and are set out in this policy.

This policy sets out how we address risk and opportunities associated with procurement and responsible sourcing and how we expect our stakeholders to act in a socially and environmentally responsible manner. NUDURA Inc. respects and values the dignity, well being and rights of employees, their families, and the wider community. The Company actively works and collaborates with employees, elected employee representatives, communities, non-governmental and other appropriate stakeholders to uphold and promote these rights.

We have a clear site-level mechanism for internal and external Stakeholders to raise issues related to our operations. All grievances are investigated and responded to.

We must encourage our key suppliers, including manufacturing contractors, to follow ISO 9001, ISO 14001 like principles. We must work with these suppliers to ensure that they continuously improve their product packaging in terms of weight, recyclable content and use of plastics. All hazardous waste and hazardous substances used within the manufacturing process should be communicated to NUDURA Inc. The risk assessment related to new and current suppliers should consider how old the machinery is, and investment in greener technologies. All in accordance or our [EHS policy](#).

We are committed to use energy efficiently in the production of materials and products and minimise the emission of greenhouse gases associated with these processes. We endeavour to reduce fossil fuel consumption and utilise renewable sources of energy.

This policy demonstrates our approach to set targets appropriate to the nature and scale of our operations. Monitor and measure performance of our transport and logistics operation. We review, engage, and communicate with all interested parties where applicable. We are committed to establishing, monitoring, and measuring continual improvement initiatives in relation to our transport impacts. Raw materials are locally sourced where possible to maximise efficiency, encourage local economies and reduce our environmental footprint. Plus, with [DURAFOLD Technology](#)[®] Our Patented Hinged Web allows NUDURA ICF Products to be shipped flat, allowing for 40% more product on a truck compared to other ICF Form products. Simply unfold and stack.

We recognise water is a precious resource and the way it is consumed and treated can impact directly on the natural environment. We take our responsibility regarding water management very seriously to ensure that the use and consumption of water is controlled and minimised. We do this through monthly key metrics & daily operating standards.

NUDURA Inc. endeavours to recover or reuse any waste generated where practicable. All wastes are appropriately segregated.

To that effect we are committed to achieve an Environmental Product Declaration that will provide Life Cycle Assessment indicators (including GHG emissions, indicating our carbon footprint) in the next 12 months.

NUDURA Inc. 's insulated concrete forms contain recycled material and enables the buildings made with them to use up to 70% less energy than traditional wood building methods—offering a greener solution for sustainable construction.

For key suppliers and manufacturing contractors, we must be satisfied that the supplier has implemented adequate procedures to maintain a safe and secure environment, and that there is a clear, publicly available health and safety policy statement in place.

NUDURA Inc. complies with [RPM's Suppliers Code of Conduct](#), as it relates to all material & service provider

NUDURA Inc. together with its suppliers must adhere to the United Nation's 10 Principles of the Global Compact covering: Human Rights, Labour and rights at work, Environment, Anti-corruption, and commitment to drive out any modern slavery practices.

Key suppliers and manufacturing contractors must be reviewed to validate their compliance with UN guidance on human rights. Suppliers are expected to treat their workers equally and with respect and dignity.

NUDURA Inc. must be satisfied that there is adequate supporting evidence that forced labour and child labour are prohibited; wages are at least above minimum legal standards; working hours comply with local directives and no employees work more than 60 hours in any given week. Appropriate HR policies are in place.

As per RPM's policies, we consider the IT security of any new supplier relationship.

All employees and agents involved in managing suppliers should be vigilant to the risk of tax evasion. We may not be complicit with any activities which help to facilitate the avoidance of tax evasion, for example a supplier requiring to be paid through an offshore tax location. Again, sourcing locally prevents from lawful events.

We support local economic regeneration through our procurement activities and encourage local procurement of materials and services where feasible. We use local agencies, labour, and workforce where possible, creating a positive impact on local communities and encourage our supply chain to do so too.

Anti-bribery and corruption

As stated in the [Suppliers Code of Conduct](#), policies are in place to insure good business practice

Selection of new suppliers

Ethical and environmental considerations must form part of the selection criteria for any new key supplier and manufacturing contractors. Standard questionnaires have been developed by procurement; the nature and extent of procedures will depend on the risks involved, for example additional procedures would be performed in respect of the Environmental process for a supplier of batteries. For a payroll provider, specific procedures must be designed in relation to data management. For key new suppliers and manufacturing contractors, a detailed site inspection may be carried out as part of the selection process, the results and conclusions must be documented and retained.

The nature and extent of review activities is commensurate to each supplier's risk. All manufacturing subcontractors and major suppliers are audited annually. The coverage of the audit must include the key operational matters in addition to the dimensions of responsible supply.

It may be possible to rely to an extent on third party sustainability reports such as ISO14001 and equivalent forms of accreditation, however the coverage, scope and methodology must be carefully verified.

NUDURA Inc. is committed to equality of opportunity and our managers develop means of assessing how effective staff development undertaken in each particular year has been in improving job performance. Annual reviews take place, and the goal is to align the person's performance objectives with the business. The following are at the core of our performance review:

- hold a formal review face to face with each employee at least once every twelve months to help the person improve their contribution.
- confirm the scope of the job description and any changes planned.
- review performance over the past period.
- set personal objectives, priorities, and competence goals for the coming period

NUDURA Inc. 's Responsible Sourcing Policy was developed in January of 2022 to reinforce our commitment of working together with our suppliers towards a long-term, sustainable and successful future for all parties. Some elements of this policy have been in place for several years and are formally documented for the first time.

Effective on February 1st, 2022, to be revised annually.



David Raymer

Director, Dryvit/Nudura Sourcing and Distribution

NUDURA Inc., January 2022

APPENDIX

RPM, CPG, NUDURA Inc. Policies that applies to the principles of Responsible Sourcing:

<https://policies.rpminc.com/>

<https://policies.rpminc.com/business-partner-management/>

<https://policies.rpminc.com/data-privacy-policies/>

<https://policies.rpminc.com/legal-compliance-policies/>

<https://www.rpminc.com/esg/environmental-sustainability/products/>

<https://www.rpminc.com/esg/environmental-sustainability/operations-waste-reduction-recycling/>

<https://www.rpminc.com/esg/environmental-health-safety/>

<https://policies.rpminc.com/legal-compliance-policies/environmental-health-and-safety-statement/>

<https://www.tremcocpg.com/ehs/>

<https://nudura.com/resources/policies-certifications/>

<https://www.rpminc.com/esg/human-rights/>

<https://policies.rpminc.com/legal-compliance-policies/human-rights-statement/>

<https://www.rpminc.com/privacy-policy/>

<https://policies.rpminc.com/data-privacy-policies/data-processing-contracts/third-parties-with-own-dp-terms-policy/>

<https://policies.rpminc.com/data-privacy-policies/global-data-protection-policy/>

<https://policies.rpminc.com/legal-compliance-policies/acceptable-use-policy/>

<https://policies.rpminc.com/business-partner-management/third-party-due-diligence-policy/third-party-due-diligence-policy/>

<https://www.nudura.com/why-nudura/>