



## **Policy Statement Regarding Modern Slavery, 2024**

Modern slavery – including but not limited to forced labour and child labour, and human trafficking are contrary to Zeton’s values and mission. We do not tolerate slavery nor human trafficking in our organization nor within those of our suppliers and subcontractors. We hold ourselves, and those we do with business with, to the highest standards and our employees, contract workers, subsidiaries, customers and suppliers are to act with integrity and comply at all times with the letter and spirit of the laws, regulations and rules that apply to Zeton Inc., an Ontario corporation. If an instance were to arise whereby such expectations were not met, Zeton Inc. will review and respond.

### **About Zeton**

Zeton is an employee- owned, multidisciplinary engineering and manufacturing company with in-house manufacturing that delivers a comprehensive array of products for our clients.

Zeton’s mission is quite simple. It is to create and develop an organization whose focus is to achieve the highest quality of service and product in its market, resulting in satisfied clients.

Zeton’s basic market is the sale of pilot or small production scale systems which apply and simulate petroleum, chemical processing or polymers technology, or related technologies, which are generally developed or licensed by others.

Zeton’s mission is being followed by application of a suitable business strategy. This strategy includes a number of parts:

- To assemble a staff of engineering, manufacturing and business people who are trained and skilled in their responsibilities, and who are motivated and dedicated to quality in every aspect of the company’s operations.
- To upgrade skills and expertise in the staff at each opportunity, and to reward staff for superior performance in an appropriate way.
- To promote a positive safety culture among all employees at all facilities.
- To market or sell our products and services to achieve a preeminent position in our worldwide market.



- To price our products and services in such a way that Zeton earns an acceptable rate of profit on its operation, for the benefit of shareholders and employees, and allowing in turn scope for upgrading systems and training for higher levels of performance.
- To expand our products and services into related technical areas, providing greater stability through diversity of operations, and acquiring in the process top people in their fields of technology.

### **Our supply chain**

For our employees and contractors that Zeton directly employs or engages, Zeton has assessed the risks of modern slavery as very low.

Goods and services that support our operations such as office equipment, utilities, IT hardware and software, office equipment, marketing material, stationary supplies, catering and cleaning services and PPE are locally sourced within North America and typically within Ontario.

A significant amount of the goods and materials that are incorporated into our completed products for our clients are also sourced within North America from qualified vendors. The bulk of our vendors are local to the area and our vendor assessment process identifies location, capability, safety, values, and quality as part of the acceptance criteria.

### **Policy Statement and Actions to Modern Slavery**

Our employees are expected to understand and comply with this Policy Statement and our Code of Conduct. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or even suggest, a breach of this Policy Statement. Employees must notify management as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any level at the earliest possible stage. If an employee believes or suspects a breach of this Policy Statement has occurred or that it may occur, they must notify management as soon as possible.



Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains. Where a supplier will not engage in an improvement process to address modern slavery or Zeton considers that it is not appropriate to continue business dealings with the supplier, Zeton will end the business relationship.

#### **Policy Statement Awareness**

Training on this Policy Statement and on the risk our business faces from modern slavery in its supply chains forms part of the on-boarding process for all who work for us and is provided as necessary. Zeton is committed to addressing the issue of modern slavery in our business and it is to be communicated to all suppliers and contractors at the beginning of our business relationship with them and will be reinforced as appropriate thereafter.

#### **Policy Statement Enforcement**

Any employee who breaches this Policy Statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this Policy Statement.

A handwritten signature in blue ink, reading 'Leisl Dukhedin-Lalla'.

Leisl Dukhedin-Lalla, Zeton Inc., President

May 27, 2024