

# **ENVIRONMENTAL POLICY**

Prepared by: Environmental & Sustainability Specialist, Jordan Bullock Reviewed & Approved by: Sr. Director, Domestic Operations Maria Alves Approved by: President & CEO Carmine Cinerari Date: May 14<sup>th</sup>, 2025

# **POLICY**

Sharp Electronics of Canada Ltd. ("SECL") is dedicated to conducting our business operations with a strong focus on safeguarding human health and the environment. We uphold high standards of environmental awareness and compliance for ourselves and our partners. Our commitment ensures that we consistently produce high-quality products while prioritizing environmental protection, innovation, and sustainability.

# RESPONSIBILITY

In alignment with the Canadian Environmental Protection Act ("CEPA") and various provincial and federal regulations pertaining to the circular economy and environmental protection, this policy outlines the responsibilities assigned to all SECL employees. These responsibilities include:

- 1. Adherence to Environmental Regulations: Ensuring compliance with all relevant environmental laws and regulations at both provincial and federal levels.
- 2. **Sustainable Practices:** Implementing sustainable practices in daily operations to minimize environmental impact.
- 3. **Environmental Awareness**: Staying informed about environmental issues and participating in ongoing training related to environmental protection.
- 4. **Waste Reduction**: Actively participating in waste reduction and recycling programs to support the circular economy.
- 5. **Reporting and Accountability**: Promptly reporting any environmental hazards or non-compliance issues to the appropriate authorities and taking corrective action when necessary.

By embracing these responsibilities, we aim to foster a culture of environmental stewardship and sustainability within SECL.

#### **PROCEDURE**

SECL has established a comprehensive Environmental Management System (EMS) designed to fulfill the following key commitments:

- **Policy and Developments Communication:** Ensure all team members and partners are informed about our environmental policy and program initiatives. Provide timely and relevant updates on environmental developments to affected business units and partners to assess impacts and implement appropriate controls.
- **Environmental Responsibility:** Conduct our operations with a strong commitment to environmental stewardship, continuously seeking ways to minimize the environmental

impact of our practices and products, particularly through responsible recycling and recovery of end-of-life materials.

- Regulatory Compliance: Adhere strictly to all Canadian federal and provincial laws and regulations related to sustainability and environmental protection.
- Continuous improvement: Strive for ongoing enhancement of our internal systems and business practices to eliminate waste and reduce environmental stress.
- Stakeholder Engagement: Proactively engage with partners and customers on current and future environmental issues that could impact SECL.
- Education and Empowerment: Educate and empower our team members to operate in an environmentally responsible manner.
- Collaboration with PROs: Work closely with Producer Responsibility Organizations (PROs) to ensure compliance with all obligations under Extended Producer Responsibility (EPR).

By following these procedures, SECL aims to demonstrate responsible environmental management, continually improving our sustainability efforts and setting a solid example within our industry.

# **DEFINITIONS**

**Circular Economy:** An economic system based on the reuse and regeneration of materials or products, especially as a means of continuing production in a sustainable or environmentally friendly way.

Environmental Management System (EMS): A framework which enables an organization to identify, monitor, and control its environmental aspects. It involves following a cycle of planning, implementing, reviewing, maintaining, and improving processes and actions to meet the organization's business and environmental goals.

**Extended Producer Responsibility (EPR):** A policy approach in which a producer's responsibility, physical and/or financial, for a product is extended to the post-consumer stage of a product's life cycle. EPR shifts responsibility upstream in the product life cycle to the producer (i.e. brand owners, first importers or manufacturers) and away from municipalities and general taxpayers.

**Producer:** Refers to brand owners, first importers and manufacturers of products and packaging. "Producers" are referred to as "industry stewards" when they are legally obligated to recover and recycle their products and/or packaging at end-of-life.

Producer Responsibility Organization (PRO): The entity designated by a producer to act on their behalf to administer an extended producer responsibility or product stewardship program. In Canada, a PRO may also be referred to as a "stewardship organization," an "industry funding organization" or a "delegated administrative organization".

Stakeholder: Any party that has an interest in a company and can either affect or be affected by the business. This includes, but is not limited to, employees, investors, customers, and distributors.

#### RECORDS RETENTION

Sharp Electronics of Canada Ltd. ("SECL") has a lawful duty to keep and maintain records pursuant to provincial legislative requirements.

Current employee records are retained in the Human Resources Department. Terminated employee records are stored on-site in a locked Human Resources area for a period of seven (7) years from termination date. Thereafter, with the permission of the Human Resources Director, a Human Resources Representative will arrange to have the files shredded.

Sharp Electronics of Canada Ltd. ("SECL") Reserves the right to review and amend this policy as required to reach the business objectives of the company and to meet legislative requirements.

This Policy is available in an alternate format upon request.