



Modern Slavery Policy

POLICY STATEMENT

Employment should be freely chosen. Modern slavery is not only violative of individuals' fundamental human rights but morally repugnant and utterly abhorrent. In its various forms, it includes compulsory labour including slavery, servitude, and forced and human trafficking (e.g., forcing individuals into sex trades), all of which have in common the deprivation of one (or more) person's liberty by another to exploit them for personal or commercial gain. Altair Global maintains a **ZERO-TOLERANCE** approach to modern slavery, regardless of the specific form. We act ethically and with integrity in all our business dealings and relationships and will **swiftly, decisively, and resolutely** enforce systems and controls to ensure modern slavery does not occur anywhere in our own business or supply chain at any tier.

Altair Global, a US-based limited liability company with global offices, is dedicated to ensuring transparency in our business and approach to tackling modern slavery throughout our entire network of supplier partners. Altair Global insists – at a minimum – on the same high standards from all our supplier partners. As part of our contracting processes, Altair Global includes specific prohibitions against the use of forced, compulsory, or trafficked labour, or anyone held in slavery or servitude, and requires our supplier partners to hold their suppliers to the same high standards regardless of the tier.

This policy applies to everyone working for us or on our behalf, in any capacity, including employees at all levels, directors and officers (each a "Team Member"), agency workers, seconded workers, volunteers, agents, contractors and subcontractors, external consultants, third-party representatives and supplier partners ("Partners").

This policy does not form part of any Team Member or Partner's contract of employment and Altair Global reserves the right to amend it at any time.

ETHICAL STANDARDS

Through Altair Global policies and practices, we communicate our values and expectations, setting a high bar for ourselves, Team Members, and Partners, making clear that we do and will not abide by even a trace or hint of the existence of modern slavery in the conduct of our business operations.

- The people who support our business are treated with fundamental dignity and

respect. We do not tolerate the use of child labour, forced labour, or human trafficking in any form in our operations or value chain.

- International standards inform our approach.
 - We recognize, support, and abide by the United Nations (UN) Guiding Principles on Business and Human Rights.
- We conduct our business lawfully and ethically.
 - The Altair Global Code of Conduct and guiding principles on professional standards establish that in performing job duties, Team Members and Partners must always act in a moral, decent, and honorable manner, upholding the best interests of Altair Global, our respective clients and customers.
- Team Members undergo mandatory annual compliance training on ethical business practices.
 - Partners must contractually commit to respect, observe, and comply with requirements and expectations for partners in our supply chain, derived from the UN Guiding Principles on Business and Human Rights.

RESPONSIBILITY FOR THE POLICY

Supplier Partnerships is responsible for ensuring this policy meets our legal and ethical obligations, and that all those under our direction or control comply.

The Vice President of Supplier Partnerships – with oversight from the Vice President of Legal Services – has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. We continually monitor and review work product to ensure no violations of this policy occur and if they do, are promptly reported to the appropriate authorities.

Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and receive any required training.

COMPLIANCE WITH THE POLICY

Accountability is shared. The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for, with, or under our control or direction. Team Members are required to actively avoid any activity that might lead to, or suggest, a breach of this policy and promptly report any *bona fide* suspicions to management.

Anyone holding a good faith belief that an individual may be subject to modern slavery, involuntary servitude, human trafficking, or any compulsory labour practice may report it without fear of reprisal, intimidation, or threats of retribution by emailing MSALert@AltairGlobal.com. A Team Member who reasonably believes or suspects a breach of this policy has occurred or that it is likely to occur in the future must notify his/her manager, Vice President Supplier Partnerships, Compliance, Legal or Executive Vice President Global TMX Resources and Administration as soon as possible. If a Team Member is unsure about whether a

particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, he/she must raise it with his/her manager, a member of the Supplier Partnerships team or through the Modern Slavery Alert email address.

Altair Global encourages openness and will support anyone who raises genuine concerns in good faith under this policy even if they turn out to be mistaken. No one will be subjected to any reprisal, retribution, or detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or any part of our supply chain. If any individual believes he or she has suffered any such treatment, he or she should inform a member of the management team immediately including by emailing MSALert@AltairGlobal.com.

COMMUNICATION AND AWARENESS OF POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be provided, where needed. We encourage suppliers within our Supplier Partnerships network to be transparent about policies and procedures that might relate to modern slavery and human trafficking, including recruitment policies and practices, and to take steps in tackling modern slavery consistent with sector, size, and operational reach.

ALL TEAM MEMBERS, SUPPLIERS, CONTRACTORS AND BUSINESS PARTNERS MUST ABIDE BY ALTAIR GLOBAL’S ZERO-TOLERANCE APPROACH TO MODERN SLAVERY AT ALL TIMES THROUGHOUT OUR BUSINESS RELATIONSHIP.

BREACHES OF THIS POLICY

Any individual or entity – at any level – found to have breached this policy will face disciplinary action, which could result in dismissal or termination for misconduct or gross misconduct.

This Modern Slavery Policy has been authorized and approved by Altair Global’s Senior Management team as of this 13th day of May 2024.

Chad Sterling
Chad Sterling
Chief Executive Officer

Kathryn A. Cassidy
Kathryn A. Cassidy
President & COO