

## 6.1 Social Responsibility Strategy Policy

### 1. Purpose:

The purpose of this Social Responsibility Strategy Policy is to outline our commitment to conducting business in an ethical, responsible, and sustainable manner. This policy aims to guide our actions and decisions to positively impact society, the environment, and the economy, while aligning with the values of our company and stakeholders.

### 2. Scope:

This policy applies to all Portobello America employees, contractors, partners, suppliers, and any other entities associated with Portobello America across all business operations, locations, and activities.

### 3. Core Values:

Our social responsibility efforts are grounded in the following core values:

- **Ethical Business Practices:** We operate with integrity and fairness, ensuring transparency and honesty in all our interactions.
- **Sustainability:** We prioritize long-term environmental and social impacts, promoting sustainable resource use and eco-friendly practices.
- **Community Engagement:** We contribute to the betterment of communities by supporting educational, health, and welfare initiatives.
- **Diversity & Inclusion:** We embrace diversity and ensure equal opportunities for all employees and stakeholders.
- **Transparency & Accountability:** We hold ourselves accountable for our actions and regularly assess our impact on society and the environment.

### 4. Key Focus Areas:

To implement our social responsibility strategy effectively, we will focus on the following key areas:

#### a. Environmental Responsibility:

- **Waste Management & Reduction:** We will minimize waste production and maximize recycling efforts throughout our operations.
- **Energy Efficiency:** We will implement energy-saving measures and explore renewable energy options to reduce our carbon footprint.
- **Sustainable Sourcing:** We will ensure that the materials and resources we use come from sustainable and ethical sources.

## b. Community Development:

- **Philanthropy & Donations:** We will support charitable initiatives, local community programs, and humanitarian efforts to improve living standards.
- **Volunteerism:** We encourage employees to volunteer their time and expertise in community service projects.
- **Social Innovation:** We will develop and support innovative solutions that address local and global social challenges.

## c. Labor & Human Rights:

- **Law Compliance:** Portobello America is dedicated to recognizing and safeguarding human rights in all countries in which we operate. Employees and business partners are expected to comply with this policy, as well as our code of conduct, which includes a specific prohibition of human rights abuse, slavery, human trafficking, and unlawful child labor.
- **Fair Treatment:** We will provide fair wages, ensure safe working conditions, and uphold labor rights in all our operations and with our suppliers.
- **Non-Discrimination:** We will foster a workplace environment that promotes diversity, equality, and respect for human rights.
- **Employee Well-being:** We will offer programs to support the health, wellness, and personal development of our employees.
- **Forced Labor:** Portobello America stands against all forms of slavery, including involuntary or coerced labor, unlawful child labor, human trafficking, and sex trafficking, and against the funding of armed groups engaged in conflict and human rights abuse. We will not tolerate any act of recruiting, harboring, transporting, providing, or obtaining a human being for compelled labor or other unlawful purposes within our business or supply chain.
- **Child Labor:** Child labor is strictly prohibited. Portobello America and suppliers shall not employ children. The minimum age for employment or work shall be 15 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. This Code does not prohibit participation in legitimate workplace apprenticeship programs consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.
- **Compliance with Environmental Regulations:** Portobello America is in compliance with all environmental regulations of both the United States and the State of Tennessee.

- **Compliance with Health and Safety Regulations:** Portobello America confirms, per reasonable inquiry, that the company is in compliance with all Health and Safety regulations of both the United States and the State of Tennessee.

d. Ethical Governance:

- **Transparency & Reporting:** We will regularly publish reports on our social responsibility efforts and outcomes, ensuring transparency in our business practices.
- **Anti-Corruption & Fair Trade:** We will adhere to anti-bribery and anti-corruption laws and encourage fair trade practices throughout our supply chain.
- **Stakeholder Engagement:** We will engage with stakeholders, including customers, employees, investors, and communities, to understand their concerns and expectations.

5. Implementation:

a. Action Plan:

- Develop specific, measurable goals in each key focus area.
- Create an annual action plan outlining the steps needed to achieve the goals.
- Establish monitoring systems to track progress and performance.

b. Roles and Responsibilities:

- **Board of Directors:** Oversee the strategy, ensure it aligns with company values, and assess its effectiveness.
- **Executive Leadership:** Lead the implementation of the strategy and allocate resources for successful execution.
- **Employees:** Engage in and contribute to social responsibility initiatives through volunteering, awareness programs, and day-to-day actions.
- **CSR Committee:** A dedicated team to monitor the implementation of the strategy, track key performance indicators, and report to leadership.

6. Communication:

We are committed to clear and transparent communication about our social responsibility initiatives. Regular updates will be shared with all stakeholders through company reports, the website, and internal communications. Feedback will be encouraged and acted upon.

7. Monitoring and Reporting:

Our company will:

- Regularly assess the effectiveness of our social responsibility initiatives.

- Track and report on key performance indicators (KPIs) to measure the impact of our actions.
- Conduct periodic reviews of this policy to ensure its alignment with current trends and regulations.

## 8. Compliance:

We will adhere to all relevant laws, regulations, and international standards related to social responsibility, including the United Nations Sustainable Development Goals (SDGs) and any local and global laws related to human rights, environmental protection, and labor practices.

## 9. Review & Continuous Improvement:

This policy will be reviewed annually to ensure it remains relevant, effective, and aligned with our overall business objectives. We will continually seek opportunities for improvement and innovation in our social responsibility efforts.

## 10. Conclusion:

Through the implementation of this Social Responsibility Strategy Policy, Portobello America aims to create long-term value for our stakeholders while contributing positively to society and the environment. Our commitment to responsible business practices will guide our actions and decisions, ensuring we leave a lasting and positive impact on the world.

With the electronic signature below, Portobello America confirms, per reasonable inquiry, that the company is in compliance with all applicable labor laws of both the United States and the State of Tennessee. Responsibility for compliance is held within our company's Human Resource Division and is evaluated on an annual basis.

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| Approved By:   | Jim Neel             |
| Approval Date: | 1/31/2025 3:27:32 PM |