



July 2026

Anti-Human Trafficking

1. Introduction: Copper State is committed to conducting its business operations in an ethical and socially responsible manner. We are dedicated to preventing human trafficking and all forms of modern slavery in our operations and supply chain. We will not tolerate forced or involuntary labor in any form and strictly prohibit child labor.

2. Scope: This policy applies to all employees, contractors, subcontractors, vendors, suppliers, and business partners associated with Copper State. It covers all company facilities, operations, and activities, both domestically and internationally.

3. Policy Statement: Copper State has a zero-tolerance approach to human trafficking and modern slavery. We are committed to the following principles:

3.1. Compliance with Laws: We will comply with all applicable laws and regulations related to human trafficking and modern slavery in the locations where we operate, including but not limited to the [Tariff Act of 1930 Section 307](#), the [Uyghur Forced Labor Prevention Act](#), and other Federal laws.

3.2. Risk-Based Due Diligence: We will conduct risk-based due diligence to identify, assess, and mitigate risks of human trafficking and modern slavery within our operations and supply chain. This includes evaluating suppliers based on geographic, industry, and product-specific risk factors, with enhanced scrutiny applied to higher-risk suppliers.

3.3. Supply Chain Transparency: We will continue to enhance transparency in our supply chain to better understand the origins of materials, components, and labor used in our products. We seek to improve traceability and visibility across our supplier network over time.

3.4. Supplier Responsibility: We expect our suppliers and contractors to adhere to the same high standards and implement anti-human trafficking measures in their operations. Suppliers may be required to complete self-assessments, provide supporting documentation, and attest to compliance with this policy through a supplier affidavit or equivalent commitment.

3.5. Monitoring and Verification: Where appropriate, Copper State may conduct or request supplier assessments, audits, or other verification activities to evaluate compliance with this policy. Suppliers found to be non-compliant may be subject to corrective action requirements or termination of business relationships.

3.6. Reporting Mechanisms: We encourage all employees, contractors, and stakeholders to report any concerns or suspicions of human trafficking or modern slavery within our organization or supply chain. Reporting may be done confidentially and, where permitted by law, anonymously. Copper State prohibits retaliation against any individual who reports concerns in good faith.

3.7. Remediation and Accountability: If violations of this policy are identified, Copper State will take appropriate remedial actions. This may include requiring corrective action plans, suspending or terminating supplier relationships, and engaging relevant stakeholders to address and resolve issues.

4. Training: We will provide training and awareness programs to employees, particularly those in procurement, supply chain, and leadership roles, to ensure they understand the risks and indicators of human trafficking and modern slavery and know how to report concerns.

5. Governance and Oversight: This policy is overseen by Copper State's designated compliance, sustainability, and HR team, who are responsible for implementation, monitoring, and periodic review. Accountability for adherence to this policy is shared across all levels of the organization.

6. Review and Continuous Improvement: We will regularly review and update this policy to ensure it remains effective and aligned with evolving regulatory requirements and best practices. We will continue to strengthen our approach to identifying and addressing risks related to human trafficking and modern slavery.

7. Communication: This policy will be made available to all employees and stakeholders through our website, intranet, and other internal communication channels.

8. Conclusion: Copper State is dedicated to promoting ethical and responsible business practices. By adhering to this Anti-Human Trafficking Policy, we aim to contribute to the prevention and eradication of human trafficking and modern slavery in all forms.