



CORPORATE SOCIAL RESPONSIBILITY POLICY

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INTRODUCTION

The Millennium Group of Delaware, Inc.'s Social responsibility allows the company's business interests to be reconciled with the legitimate interests of the different stakeholders that may be affected and also assumes the impact of the company's activities on the community in general and the environment.

The present Corporate Social Responsibility Policy (hereinafter, "CSR Policy") intends to establish a reference framework, from which any TMG company can develop and strengthen socially responsible behavior, regardless of the way — conventional and/or digital — the business is carried out and the country it operates in, locally adapting any actions that are necessary for compliance with it.

The Millennium Group of Delaware, Inc.'s Code of Ethics and Conduct

TMG will conduct business honestly and ethically wherever operations are maintained. We strive to improve the quality of our services, products, and operations and will maintain a reputation for honesty, fairness, respect, responsibility, integrity, trust, and sound business judgment. Our associates are expected to adhere to high standards of business and personal integrity as a representation of our business practices, at all times consistent with their duty of loyalty to TMG. We expect that associates will not engage in unethical practices including but not limited to theft, harassment or falsifying records/documents. We also expect that they will not knowingly make misrepresentations about TMG and will not speak on behalf of TMG unless specifically authorized. The confidentiality of trade secrets, proprietary information, and similar confidential commercially sensitive information (i.e., financial or sales records/reports, marketing or business strategies/plans, product development, customer lists, patents, trademarks, etc.) about TMG or operations, or that of our customers or partners, is to be treated with discretion and only disseminated on a need-to-know basis.

Standards of Conduct

TMG wishes to create a work environment that promotes job satisfaction, respect, responsibility, integrity, and value for all our associates, clients, customers, and other stakeholders. We all share the responsibility of improving the quality of our work environment. By deciding to work here, you agree to follow our rules.

While it is impossible to list everything that could be considered misconduct in the workplace, what is outlined here is a list of common-sense infractions that could result in discipline, up to and including immediate termination of employment. This policy is not intended to limit our right to discipline or discharge associates for any reason permitted by law.

Examples of inappropriate conduct include, but are not limited to:

- Violation of the policies and procedures set forth in this Standard of Conduct;
- Possessing, using, distributing, selling, or negotiating the sale of illegal drugs or other controlled substances.
- Being under the influence of alcohol during working hours on Company property (including in Company vehicles), or on Company business.
- Inaccurate reporting of the hours worked by you or any other associates.
- Providing knowingly inaccurate, incomplete, or misleading information when speaking on behalf of TMG or in the preparation of any employment-related documents including, but not limited to, job

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applications, personnel files, employment review documents, intra-company communications, or expense records.

- Taking or destroying Company property.
- Possession of potentially hazardous or dangerous property (where not permitted) such as firearms, weapons, chemicals, etc., without prior authorization.
- Fighting with, or harassment of (as defined in our EEO policy), any fellow associate, vendor, or customer.
- Disclosure of Company trade secrets and proprietary and confidential commercially sensitive information (i.e., financial or sales records/reports/remarks, marketing or business strategies/plans, product development information, customer lists, patents, trademarks, etc.) of TMG or its customers, contractors, suppliers, or vendors.
- Refusal or failure to follow directions or to perform a requested or required job task.
- Refusal or failure to follow safety rules and procedures.
- Excessive tardiness or absences.
- Smoking in non-designated areas.
- Working unauthorized overtime.
- Solicitation of fellow associates on Company premises during working hours.
- Failure to dress according to Company policy.
- Use of obscene or harassing (as defined by our EEO policy) language in the workplace.
- Engaging in outside employment that interferes with your ability to perform your job at the Company.
- Gambling on Company premises.
- Lending keys or keycards to Company property to unauthorized persons.
- Allowing unauthorized people on Company or client premises or vehicles; and
- Engaging in intimate acts while on Company or client premises.

Nothing in this policy is intended to limit your rights under the National Labor Relations Act, or to modify the at-will employment status where at-will is not prohibited by state law.

Violation of the Ethics Code can result in discipline, up to and including termination of employment. The degree of discipline imposed may be influenced by the existence of voluntary disclosure of any ethical violation and whether the violator cooperated in any subsequent investigation. Violations should be reported to our Ethics Hotline: (732) 741-4870, ext. 293. TMG's Ethics Hotline is confidential, and reports can be submitted anonymously.

Conflicts of Interest

TMG is concerned with conflicts of interest that create actual or potential job-related concerns, especially in the areas of confidentiality, customer relations, safety, security, and morale. If there is any actual or potential conflict of interest between you and a customer, vendor, TMG associate or contractor to TMG,

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you must disclose it to your direct supervisor. If an actual or potential conflict of interest is determined to exist, TMG will take such steps as it deems necessary to reduce or eliminate this conflict.

Intentional failure to disclose or report a conflict of interest can result in discipline, up to and including termination of employment.

Employment of Relatives and Friends

TMG wants to ensure that corporate practices do not create situations such as conflicts of interest or favoritism. This extends to practices that involve associate hiring, promotion and transfer. Close relatives, partners, those in a dating relationship or members of the same household are not permitted to be in positions that have a reporting responsibility to each other. Close relatives are defined as husband, wife, domestic partner, father, mother, father-in-law, mother-in-law, grandfather, grandmother, son, son-in-law, daughter, daughter-in-law, uncle, aunt, nephew, niece, brother, sister, brother-in-law, sister-in-law, step relatives, cousins and domestic partner relatives. If associates begin a dating relationship or become relatives, partners or members of the same household and if one party is in a supervisory position, that person is required to inform management and the TMG Human Resources department of the relationship within 30 days of occurrence. TMG reserves the right to apply this policy to situations where there is a conflict of interest or the potential for a conflict of interest because of the relationship between associates, even if there is no direct-reporting relationship or authority involved.

Intentional failure to disclose a relationship outlined in this policy may result in disciplinary action, up to and including termination of employment.

Anti-Corruption

One of the guiding principles of TMG is complying with anti-corruptions laws. The Anti-Corruption Policy extends on this principle and is applicable to all associates and everyone we do business with, including agents, representatives, consultants, independent contractors, and anyone acting on behalf of TMG.

Associates with questions regarding TMG's Anti-Corruption Policy, they should contact their Operations Manager and/or the Ethics Hotline at (732) 741-4870, ext. 293. TMG's Ethics Hotline is confidential, and reports can be submitted anonymously.

This policy outlines acceptable and non-acceptable behaviors to ensure compliance with domestic and foreign anti-corruption laws, prohibiting improper payments, gifts, or inducements of any kind, to and received from any person, including officials in the private or public sector, customers and suppliers.

Corruption Terminology

- **Bribe:** Anything of value given to affect a person's actions or decisions in order to gain or retain a business advantage. Anything of value includes cash, entertainment or other gifts or courtesy.
- **Corruption:** The misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government.
- **Facilitation payments:** Small sums paid to government officials to facilitate or expedite routing. Non-discretionary government actions are considered facilitation payment.
- **Kickbacks:** The return of a sum already paid or due as a reward for awarding or furthering business. Examples of corruption in the workplace can take place in many types of activities. It usually is designed to obtain financial benefits or other personal gain. For example, bribes are intended to influence behavior – they could be in the form of money, a privilege, an object of value, an advantage, or merely a promise

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to influence a person in an official or public capacity. Usually, two people are involved, and both will benefit. Examples of a bribe include offer or receipt of cash in the form of a kickback, loan, fee, or reward and/or giving of aid, donations, or voting designed to exert improper influence. The areas of business where corruption, including bribery, can most often occur include Gifts, Entertainment and Hospitality, Facilitation Payments, Procurement Process, and/or Political, Community and Charitable Contributions.

Gifts, Entertainment, and Hospitality

You may accept gifts only under exceptional circumstances and with prior approval of your Operations Manager. Examples of gifts, entertainment, and hospitality include the receipt or offer of gifts, meals, or tokens of appreciation and gratitude, invitations to events, functions, or other social gatherings, in connection with matters related to our business. These activities are acceptable provided they fall within reasonable bounds of value and occurrence.

Procurement Process

Associates must follow TMG processes and adhere to the system of internal controls around supplier selection. Supplier selection should never be based on receipt of a gift, hospitality, or payment. When supplier selection is a formal, structured invitation for the supply of products or services (often called a “tender”), it is most important that TMG maintains documentation supporting internal controls.

A tender process includes an invitation for other parties to make a proposal, on the understanding that any competition for the relevant contract must be conducted in response to the tender, no parties having the unfair advantage of separate, prior, closed-door negotiations for the contract where a bidding process is open to all qualified bidders and where the sealed bids are in the open for scrutiny and are chosen on the basis of price and quality.

Political Community and Charitable Contributions

Associates are not allowed to make political contributions from Company funds. Contributions made by TMG to community projects or charities need to be made in good faith and in compliance with TMG's Code of Business Conduct, this Anti-Corruption Policy and all relevant TMG procedures.

Books, Records, and Internal Control Requirements

Expenses must never be hidden or purposefully misclassified. Many serious global bribery and corruption scenarios are found to involve inaccurate record-keeping. To prevent this, international anti-corruption laws generally require detailed and accurate accounting records for transactions, including cash and bank accounts. Associates must ensure maintenance of accurate books, records, and financial reporting.

All business units must maintain an effective system of internal control and monitoring of our transactions. Specifically, regarding approval of travel and entertainment expenses. It is the associate's responsibility to be knowledgeable of control procedures and ensure compliance.

Associate Responsibility

TMG takes corruption and bribery very seriously. Any violation of this policy will be regarded as a serious matter by the Company and is likely to result in disciplinary action, including termination of employment, consistent with local law.

Bribery is a criminal offense. Associates are held accountable whether they pay a bribe or whether they authorize, assist, or conspire with someone else to violate an anti-corruption or anti-bribery law. Punishment for violating the law would be against the associate as an individual and may include imprisonment, probation, mandated community service and significant monetary fines which will not be paid by TMG.

Associates who are unsure if they should accept something of value, such as gifts, entertainment, or hospitality by TMG or to TMG, are expected to inform their Operations Manager, and/or the Ethics Hotline at (732) 741-4870, ext. 293. TMG's Ethics Hotline is confidential, and reports can be submitted anonymously.

It is also helpful for associates to ask themselves:

- What is the intent – is it to build a relationship or is it something else?
- What if the situation were reversed – would there be a double standard?

If an associate is uncomfortable with the answer to one or both of the above questions because of the nature of the gift/entertainment, or hospitality, he/she should contact his/her direct supervisor. Associates who are concerned that an anti-corruption violation is occurring or has occurred should report it immediately to one or more of the following:

- Your local Operations Manager; and/or
- The Ethics Hotline at (732) 741-4870, ext. 293. TMG's Ethics Hotline is confidential, and reports can be submitted anonymously.

GOALS

TMG defines its social responsibility as a *"voluntary and strategic commitment that entails attempting to achieve business targets while complying strictly with its legal and contractual obligations, applying criteria of equity and stability to relationships with its stakeholders, thus contributing to meeting the current and future needs of society."*

Promoting Corporate Social Responsibility at TMG must be perceived as a way of:

- Achieving TMG's corporate interest and its strategic goals.
- Managing the company based on TMG values of solvency, integrity, vocation for service, innovation for leadership and committed team, which must be present in any business project that is carried out.
- Establishing relationships of stability and equality with stakeholders related to the company, mainly those defined in the mission: shareholders, employees, providers, distributors, clients and society.
- Managing the risks and business opportunities arising from the development of the environment in which TMG does business, assuming the impact it generates on society and the environment, maximizing the positives and minimizing the negatives.
- Transmitting the company's social value in each territory, which reconciles the value of its operational

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activities with the value of the not-for-profit activities it carries out.

Therefore, and to be able to achieve these goals appropriately, the following general and specific principles of action are hereby established.

GENERAL PRINCIPLES OF ACTION

1. **Compliance with International Commitments** relating to Social Responsibility, subscribed to by TMG.

TMG voluntarily adheres to the UN Global Compact, to the United Nations Environment Program Financial Initiative (UNEPFI) and the Principles for Sustainable Insurance, promoted by this initiative.

The voluntary adherence of any country or region to this type of international initiative has an impact on TMG's reputation and entails compliance with the commitments assumed; it must therefore be authorized by the Corporate CSR Committee before its approval by the entity's competent governing bodies.

2. **Compliance with current national and international laws and regulations** in all countries that TMG operates in, adopting complementary international rules and guidelines such as those established by the OECD and International Labor Organization (ILO) agreements, wherever there is not a sufficient or appropriate legal framework.

3. **Maintaining corporate governance practices** based on ethics, business transparency and diversity: respecting the rules of the free market and free competition and rejecting any illegal or fraudulent practice contrary to the rules of good governance, to TMG corporate policies and rules and to the guidelines of the Code of Ethics and Conduct, in order to accrue business benefits.

TMG has internal mechanisms for preventing, monitoring, reporting and penalizing any practice described in the paragraph above that occurs within TMG.

4. **Communication and dialog with all stakeholders**, based on transparency, truth and commitment, as fundamental pillars for building stable relationships that generate trust.

TMG needs the involvement of its stakeholders, especially those defined in its mission, to achieve its business and social goals and, therefore, it has established specific channels for communication and dialog that also facilitate the company in learning about their needs and expectations.

TMG undertakes to continuously review and adapt these channels, applying new technologies so that they are appropriate and efficient.

Furthermore, TMG has available processes for identifying those matters considered material or relevant to the development of its business activity and for its stakeholders. This material process is structured as a complement to the aforementioned dialog channels.

5. **Commitment to transparency**, as a way of conveying and generating trust and credibility among our stakeholders. This involves:

- a) Disseminating relevant and truthful information regarding TMG's performance and activities, complying with any legal requirements that may exist regarding public information.

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- b) Compiling and publishing financial and non-financial information using some of the internationally accepted methods in the latter case and subjecting it to the internal and external verification processes considered suitable that guarantee its reliability and provide an incentive for continual improvement.

6. **Commitment to Human Rights.** TMG's adherence to the United Nations Global Compact and its 10 principles directly commits us to the respect, defense and protection of Human Rights, contained in the International Bill of Human Rights, the Conventions of the International Labor Organization (ILO), and the Declaration on Fundamental Principles and Rights at Work.

Therefore, in the Human Rights field, TMG undertakes to:

- a) Avoid practices that are discriminatory or damage people's dignity:
 - a. 1. Striving for a decent, safe and healthy working environment, adopting rules and procedures in the area of occupational health and prevention of occupational risks, avoiding any kind of discriminatory attitude, intimidation or violence, in any of their manifestations due to sex, race, creed, religion, age, disability, political beliefs, sexual disposition, nationality, citizenship, marital status or socioeconomic status.
 - a. 2. Rejecting child labor and forced or compulsory labor.
- b) To respect its employees' freedom of union, association and TMG's negotiation and respect the role and responsibilities that apply to the representation of workers in accordance with current legislation.
- c) To provide decent employment:
 - c. 1. TMG pays its employees in a decent manner, adjusted to their skills, responsibilities and duties. This payment is aligned with applicable legislation and with conditions in the market where it operates, which allows them to meet their basic needs and those of their families.
 - c. 2. TMG guarantees the right of its employees to a workday that respects their right to rest and that facilitates flexi-work practices, acknowledging employees' need to balance their work life with other interests and responsibilities.
 - c. 3. TMG, likewise, guarantees people's right to personal data privacy.
- d) To implement due diligence procedures to identify possible situations of greater risk in relation to human rights, and to develop mechanisms for preventing and mitigating these risks in its activities.

To facilitate compliance with these commitments, TMG will create a Guide to the Practical Application of Human Rights, which takes the following action areas into consideration: (a) internal, involving all company management and employees, (b) external, which involves stakeholders that are related to the company, especially suppliers and contractors.

The Guide will be based on the recommendations in the UN Guiding Principles on Business and Human Rights, the TMG Code of Ethics and Conduct, and corporate policies that are determined in the general and specific principles of this CSR Policy.

7. **Fiscal responsibility.** TMG, aware that the payment of taxes has a direct impact on the financial and social development of the countries it operates in, meets its tax obligations in accordance with the fiscal legislation that exists in those countries, paying the corresponding taxes in accordance with the profit generated in each territory.

In this regard, the following commitments are assumed:

- a) Decisions with tax implications are adopted using a reasonable interpretation of the regulation, considering the business reality that generates the business that is the object of tax.
- b) The existence of significant tax risks is mitigated, ensuring that the tax is in suitable relation to the business structure in each country, considering the activities performed, and the material and human resources employed in each activity.
- c) In those jurisdictions where there are collaborative relationship systems between taxpayers and tax authorities, TMG actively participates in an attempt to reduce conflict in the interpretation and application of tax regulations.

Environment Policy

TMG conducts its activity with a firm commitment to contribute to sustainability from an environmental perspective, materialized through the integration of the environment into the business, the promotion of environmental responsibility, preservation of biodiversity, prevention of pollution, efficient management of resources and adaptation and mitigation of climate change, in accordance with what is established in TMG's Environment Policy. The Millennium Group is certified green through GeoTab Services. TMG Corporate is working diligently to reduce carbon footprints and create a green working environment within the offices. TMG Environmental policy outlines green practices for employees to follow and has changed purchasing to green certified products. Emissions for the TMG National Fleet is tracked through the GeoTab Portal. Scope 1 and 2 reports are generated from the data entered; The Millennium Group have a goal of reducing gas emissions by 5% by the end of 2026. TMG is committed to Waste Management and follows the following guidelines to ensure the policy is being carried out within the organization:

- 1. Avoid using paper by distributing and storing documents electronically.
- 2. Print and photocopy only what you need and double side your jobs when possible.
- 3. Use the back side of old documents for faxes, scrap paper, or drafts.
- 4. Use durable reusable beverage containers, plates and utensils.
- 5. Reduce the amount of toner in documents that will be printed when possible.
- 6. Print documents in black and white or gray scale whenever possible.
- 7. Recycle plastic and paper products in accordance with town regulations.
- 8. Donate used electronics and furniture.
- 9. Purchase copier and printer paper that contains 30% post-consumer recycled content.
- 10. Purchase office supplies and furniture that contain the highest percentage of recycled and non-toxic content whenever possible.
- 11. Purchase products that contain biobased content whenever possible.
- 12. Purchase an eco-friendly coffee machine in the office.

Promotion of social responsibility, with active participation in national and international reference forums and organizations that promote behavior and commitment aligned with the content of this CSR Policy.

SPECIFIC PRINCIPLES OF ACTION

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Employees

TMG has a Code of Ethics and Conduct that establishes the rules that must govern behavior and action among employees and in their relationships with third parties. Furthermore, it promotes a working environment based on an atmosphere of mutual trust and commitment, which involves:

- Consolidating a culture of respect for people and behavior that is favorable and open to diversity faced with any of the Company's stakeholders.
- Guaranteeing the right to effective equal opportunities and dealings with all workers, which allows them — without exception — to develop personally and professionally.
- Avoiding any type of occupational discrimination in the areas of access to employment, promotion, professional classification, training, compensation, work/life balance and other working conditions.
- Contributing to maintaining working environments that are free of harassment and behavior that is violent or offensive to people's rights and dignity, and guarantee that, if it occurs, there are appropriate procedures for dealing with the problem and correcting it.
- Achieving an optimal level of occupational security and achieving a working environment that allows TMG professionals to carry out their work in the best physical and psychical conditions and conditions of well-being.
- Promoting the establishment of payment conditions that guarantee a decent salary, acknowledging the effort and contribution of employees to the company profit.
- Offering employees the opportunity to channel and develop their most charitable side through Corporate Volunteering, in accordance with TMG's General Volunteering.

Clients and Insured Parties

They are the basis of the business, including potential clients and, therefore, TMG assumes the following commitments:

- Providing honest assessment and full information regarding the characteristics and qualities of TMG products and services, before they are hired.
- Providing an accessible and quality service within the agreed time frame, tracking the client experience, using surveys to measure their satisfaction and other methods and systems that facilitate continual active listening to the client in all the processes and operations where the latter relates to the company.
- Maintaining due confidentiality in processing their data.
- Managing and resolving their claims in the shortest time possible.
- Maintaining appropriate and efficient channels of communication using the most appropriate means.
- Continually innovating so as to provide added-value services and products, facilitating and promoting access to insurance for the greatest number of TMG.
- Respecting and complying with the rules that regulate communications and marketing activities and

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assuming the voluntary codes that lend transparency and truth to these actions.

Suppliers

TMG has a supplier relationship and management model that attempts to ensure a socially responsible and ethical process in its action with all the participants in the value chain. This involves:

- Adopting responsible practices that generate mutual value, in addition to focusing on efficiency and the quality of products and/or services provided by TMG suppliers.
- Ensuring that the value chain complies with TMG's values and principles, with the Code of Ethics and Conduct and the principles established in this policy.
- Guaranteeing that both the Corporate Procurement Regulations (Supplier Profile Kit) and the General Model Guidelines and service provider management policies are complied with within TMG documentation.

Distributors/Brokers

TMG distributes its products and services using a broad network of brokers and collaborating entities and therefore assumes the following commitments:

- Maintaining permanent dialog using the specific platforms and commercial structures created for this purpose.
- Ensuring selection and payment processes that allow professional responsibilities and skills to be valued, along with other aspects of interest that ensure the quality of the service provided.
- Implementing a training model adapted to the needs of each distributor, paying special attention to training focused on compliance with TMG values and strategy and the CSR Policy

Shareholders

TMG considers that its relationship with shareholders and investors, besides being based on trust, must have the goal of creating sustainable value, and undertakes to promote informed participation by shareholders at general meetings, dealing with them all in the same manner.

Society

TMG is committed to the economic and social development of the countries where it carries out its activity and therefore:

- Assumes the impact that its activity generates in society, evaluating and managing non-financial, ethical, governing, reputational, social and environmental risk, in accordance with what is established in the TMG's Supplier Profile Kit or any other complementary corporate policy adopted, and also with what is established in the general principle six of this policy, relating to Human Rights.
- It is bound to those social activities or initiatives that benefit society.

In this regard TMG considers that its priority social action sectors are disability, road safety and accident prevention, promotion of insurance culture, health promotion, the environment and corporate volunteering.

To develop its action areas, TMG may establish collaborations with public or private organizations, which carries out its activities in accordance with what is established by its Board of Trustees and

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its company bylaws.

- It considers that it also contributes to the development of activities that lead to benefits for society through the line of sponsorships that it promotes, in accordance with the Corporate Sponsorship.

HEALTH & SAFETY

Emergency Preparedness

Emergency Preparedness Planning provides TMG with the capability to prepare for and be able to respond promptly to short-term or long-term disruptions. Well-maintained continuity plans can minimize or eliminate chaos, confusion and financial devastation in the event of a disaster. Identification of essential personnel with roles and responsibilities is relevant for managing a disruption. Well-conceived business continuity plans could be crucial to the survival of an organization.

In order for The Millennium Group of Delaware, Inc. (TMG) to ensure the solvency of the company when faced with disaster and to provide the continuous service their customers demand, a business continuity plan (BCP) has been put in place. This plan is built with the understanding that TMG would govern its BCP predominately from the Parent-Child relationship of Direct Mail Depot (DMD) combined with field BCP as directed by TMG clients. Enveloping expedient field measure for corporate operations and the use of virtual secure connections will enable TMG to maintain its corporate support needs through unfavorable conditions.

The term "Emergency Preparedness" refers to the prevention and/or mitigation of those events that could cause irreparable damage or extensive disruption. TMG is at risk to a number of these potentially disruptive events. These events include but are not limited to the following situations:

- Bomb Threat
- Pandemic
- Fire
- Water Damage
- Power Outage
- Tornado
- Lightning
- Extreme Heat
- Winter Storm

While these might occur in limited fashion or sever events, TMG's practices and preparedness remain the same for reacting to such incidents. Greater details can be found in the TMG Business Continuity and Resumption Plan.

Incident & Accident Management

Purpose

The purpose of this program is to have effective procedures for reporting and evaluating/investigating incidents and non-conformances to prevent further occurrences.

Responsibilities

Responsibilities for incident investigation will be assigned prior to occurrence of an incident. Individual responsibilities for reporting and investigation must be pre-determined and assigned prior to incidents.

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Operations Manager

Ensure investigations are conducted and assists in identifying corrective actions.

All Documentation / Records are reported to the Operations Manager and all required parties (such as HR).
All records are to be maintained and stored by the Operations Manager on the corporate server.

Site Manager and Supervisors

Investigates (or assists in) incident investigations.

Corrects non-conformances.

Accompany injured employees to the medical provider for initial treatment.

All parts of the investigation are documented.

Employees

Immediately report any injury, job related illness, spill, or damage to any property to their immediate supervisor. If their immediate supervisor is not available, the employee is then to immediately notify the Operations Manager. Employees who could be first responders will be trained and qualified in first aid techniques to control the degree of loss during the immediate post-incident phase.

Procedure

After immediate rescue or response, actions to prevent further loss will occur if the scene is safe. For example, maintenance personnel should be summoned to assess integrity of buildings and equipment, engineering personnel to evaluate the need for bracing of structures, and special equipment/response requirements such as safe rendering of hazardous materials or explosives employed.

Investigations of Incidents & Non-conformances

Investigation is an important part of an effective safety program in that it determines the root cause and corrective actions necessary to prevent similar incidents or non-conformances.

The following must be reported to the employee's supervisor immediately. If that person is not available, then the Operations Manager shall be immediately notified for:

Near miss incidents with the potential to harm people, the environment, or assets

Work related injuries or illnesses; Property damage including vehicle incidents.

Hazardous chemical spillage, loss of containment and contamination

Non-conformance to safety or environmental rules, policies, or standards

The supervisor shall make the necessary notifications and begin the incident investigation process.

In the case of a major injury or incident the scene of the event should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation.

Incident investigation occurs as soon as possible, while the facts are still fresh within the minds of those involved (i.e., witnesses). Take the opportunity to talk to all of those involved before they become unavailable or memory fades. An incident investigation must be thorough and concerned only with cause and prevention and must be separate from administrative disciplinary action.

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Equipment

Proper equipment will be available to assist in investigating. Equipment may include some or all the following items: writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorder, PPE, flags, equipment manuals, etc. The Site Manager shall have an incident investigation kit prepared in advance.

Incident Reporting Matrix

The Incident Reporting Matrix identifies, based on type of incident, who within corporate management shall be verbally notified and when. It also specifies which type of report from the field shall be completed based on the type of incident.

Reporting of the incident must occur in a specified manner based on site specific requirements and the reporting sequence shall be posted.

EXTERNAL INCIDENT NOTIFICATION MATRIX

Type of Incident	Who to Notify Verbally	When	Incident Report
Minor First Aid	Operations Manager/HR	24 hrs.	Yes
Injury Above Minor First Aid	911 / Site Medical Response / Ops. Mgr./HR/Client	ASAP	Yes
As Required Injury Reporting	OSHA / HR/Ops. Mgr.	Within 8 hrs.	Yes
Fire / Explosion	911 / Site Fire Response / Ops. Mgr. /HR	ASAP	Yes
Reportable Spill	Site Environmental / Ops. Mgr. /HR/ Client	Within 24 hrs.	Yes
Property/Vehicle Damage	Ops. Mgr./HR/Client	Within 24 hrs.	Yes

INTERNAL INCIDENT NOTIFICATION MATRIX

Type of Incident	Who to Notify Verbally	When	Incident Report
Minor First Aid	Site Mgr./Ops. Mgr./HR	ASAP	Yes

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Injury Above Minor First Aid	Site Mgr./Ops. Mgr./HR	ASAP	Yes
As Required Injury Reporting	Site Mgr./Ops. Mgr./HR	ASAP	Yes
Fire / Explosion	Ops. Mgr./Ops. Dir./HR/President	ASAP	Yes
Reportable Spill	Ops. Mgr./Ops. Dir./HR/President	ASAP	Yes
Property/Vehicle Damage	Ops. Mgr./Ops. Dir./HR/President	ASAP	ASAP

Time Elements for OSHA and Client Notification

Required incidents must be verbally reported to OSHA within 8 hours of their discovery. Incidents must also be reported to the client as soon as possible or in a timely manner (within 24 hours of incident). All recordable illnesses or injuries must be recorded on the OSHA 300 Log within 7 days.

Incident Review Team and Incident Investigation Report

All incidents will be investigated to the appropriate level with regard to incident severity. While all incidents should be investigated, the extent of such investigation shall reflect the seriousness of the incident utilizing a root cause analysis process or other similar method determined by The Millennium Group's Operations Manager. They will form an Incident Review Team that participates in the determination of the final root cause investigative incident report. The team consists of representatives of management or other designees as assigned by The Millennium Group's Operations Manager.

Initial Identification/Assessment of Evidence

Initial identification of evidence immediately following the incident could include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc.

Collection/Preservation and Security of Evidence

Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment.

Witness Interviews and Statements

Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviews should also be addressed. All items shall be dated.

The final incident investigation report consists of findings with critical factors, evidence, corrective actions, responsible parties, and timelines for corrective action completion.

Results of incident investigations are communicated to employees via the Incident Notice form.

Preparation of the Written Incident Report

Written incident reports will be prepared and include the Field Incident Report Form and a detailed narrative statement concerning the events. The format of the narrative report may include an introduction, methodology, summary of the incident, Incident Review Team member names, narrative of the event, findings, and recommendations. Photographs, witness statements, drawings, etc. should be included.

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The supervisor completes The Millennium Group's Incident Report and takes the steps below when beginning an incident investigation:

- Provide emergency assistance, as needed, and qualified for
- Secure the area as quickly as possible to retain area in the same condition at the time of the incident.
- Notify management by phone according to the Incident Notification Matrix
- Identify potential witnesses.
- Use investigation tools, as needed (camera, drawings, video, etc.)
- Tag out for evidence of any equipment that was involved.
- Interview witnesses (including the effected employee) and obtain written, signed statements and fax to The Millennium Group's Operations Manager.
- Prepare The Millennium Group's Incident Report, sign the form, fax it to the Operations Manager.
- Implement any immediate corrective actions needed.

Incident Notice Form

The Millennium Group shall provide documentation and communication of lessons learned, and a review of similar operations to prevent reoccurrence. Lessons learned are reviewed and communicated. Changes to processes must be placed into effect to prevent reoccurrence or similar events.

To communicate incident information and lessons learned from incidents The Millennium Group's Operations Manager shall send the Incident Notice to all work sites. The form should be posted on employee bulletin boards and should be discussed in weekly safety meetings until all employees at the job site have been informed of the incident.

Corrective Actions Resulting from Incident Investigations

Incident investigations should result in corrective actions, individuals should be assigned responsibilities relative to the corrective actions, and these actions should be tracked to closure.

Site Managers are held accountable for closing corrective actions. Corrective actions for safety improvement input are posted at each site and tracked by The Millennium Group's Operations Manager to ensure timely follow up and completion.

Corrective actions are also used as needed for revisions to site specific safety plans and The Millennium Group's Safety and Health Management System.

Injury Classifications

Injuries shall be classified per the following:

- First Aid – Dressing on a minor cut, removal of a splinter, typically treatment for household type injuries.
- Lost Workday Case (LWDC) – An injury that results in an employee being unfit to perform any work on any day after the occurrence of an occupational injury.
- Number of Lost or Restricted Workdays – The number of days, other than the day of occupational injury and the day of return, missed from scheduled work due to being unfit for

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work or medically restricted to the point that the essential functions of a position cannot be worked.

- Occupational Injury – An injury which results from a work-related activity.
- Occupational Illness – Any abnormal condition or disorder caused by exposure to environmental factors while performing work that resulted in medical treatment by a physician for a skin disorder, respiratory condition, poisoning, hearing loss or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Do not include minor treatments (first aid) for illnesses.
- Recordable Medical Case (RMC) – An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) and yet results in no lost work time beyond the day of injury.
- Restricted Workday Case (RWDC) – An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury, but where there is no time lost beyond the day of injury. An example would include an injured associate who is kept at work but not performing within the essential functions of their regular job.
- Work- or Work-Related Activity – All incidents that occur in work related activities during work hours, field visits, etc. are reportable and are to be included if the occupational injury or illness is more serious than requiring simple first aid. Incidents occurring during off hours and incidents while in transit to or from locations that are not considered an employee's primary work are not reportable.

The following are examples of incidents that will not be considered as recordable:

- The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
- The injury or illness results solely from voluntary participation in a wellness program or in flu shot, exercise class, racquetball, or baseball.
- The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).

OSHA Logs

The OSHA 300A Log – Must be signed by a company official. The OSHA 300A log must be posted and visible to all employees. The log must be posted on February 1 and must stay posted until April 30th.

All Logs and Forms must be maintained for 5 years.

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Training

The Millennium Group shall train personnel in their responsibilities and incident investigation techniques. Personnel must be trained in their roles and responsibilities for incident response and incident investigation techniques. Training requirements relating to incident investigation and reporting are described below:

Risk Treatment Key	
High Risk Level – Immediate action required!	
Medium/Tolerable Risk Level – Risks must be reduced so far as is possible.	
Low/Broadly Acceptable Risk Level – Monitor and further reduce where possible.	

Training frequency will be based on the specific area of responsibility but shall not exceed once every two years. Training requirements related to incident investigation and reporting shall include:

- Awareness
- First Responder Responsibilities
- The Initial Investigation at the Accident Scene
- Managing the Accident Investigation
- Collecting Data
- Analyzing Data
- Developing Conclusions and Judgments of Need
- Reporting the Results

Event Risk Management – Risk Assessment Plan (RAP)

Use this risk matrix and the accompanying planning chart to:

- Help you identify risks associated with your event,
- Decide how likely and how serious potential event risks could be,
- List ways to prevent the risks from happening (i.e., mitigate the risks), and
- List possible solutions in the event the risk happens.

LIKELIHOOD	SEVERITY		
	Minor	Moderate	Major
Likely	MEDIUM	HIGH	HIGH
Possible	LOW	MEDIUM	HIGH
Unlikely	LOW	LOW	MEDIUM

Fill in the associated risks of your event, along with possible ways to mitigate them. During this process you are managing foreseeability – the process of thinking about what could happen at your event and what you could reasonably do to prevent it.

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The Millennium Group
Incident/Service Failure Report

Site: _____ Manager: _____

Type of Service Failure Incident:

- ☐ Mail ☐ Shipping/Receiving ☐ Copy ☐ Records
☐ Theft ☐ Staffing ☐ TMG Policy/Procedures
☐ Scope-Of-Service ☐ Other: Vehicle Accident

Date & Time Incident Accrued: _____

Department: _____

Employee (s) Name (s): _____

Nature and Extent of Incident include Estimated Cost/Damages/Losses (if applicable)

Location of Incident: _____

Persons Involved: _____

Description of incident/service failure include names of employees, customers, and vendors, along with a statement as to what each person was doing at the time of the incident.

Issue:

Signature and Title of the person(s) who investigated this incident.

Supervisor/Manager signature

Manager/Operations Manager signature

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Could this incident have been avoided?

Has the client contact been contacted?

List what corrective action is being taken so this incident does not recur:

Further Action Recommendations:

Notifications: ☐ Associate Director of Operations ☐ Director of Operations
☐ HR Manager

Statements:

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The Millennium Group Accident Report

Employee Information:

Name (include middle initial):

Home address:

Home phone:

Work phone:

Date of birth:

Gender:

Marital status:

No. of dependents:

Primary language:

Social security #:

Job title:

Hire date:

Pay rate:

Hours worked per week:

Shift starts:

Shift ends:

Time employee arrived at work on the day of the accident:

Usual workdays (please circle all which apply): Mon Tue Wed Thurs Fri Sat Sun

Employee status (please circle one): Part-time Full-time

Accident Information:

Address where accident occurred:

Supervisor's name:

Supervisor's phone no:

Date of accident:

Time accident occurred:

Accident reported to (include name and title):

Date accident was reported:

Time accident was reported:

Description of what happened (please be specific):

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Was employee performing his/her regular job duties (please circle one): Yes No

Was safety equipment provided (please circle one): Yes No *if yes, describe it in detail?

Was there a machine part involved (please circle one): Yes No *if yes, describe in detail.

Type of injury:

Body part injured:

Days of work employee is expected to miss:

Name of witness 1:

Name of witness 2:

Was emergency service or ambulance required (please circle one): Yes No

Name of physician or hospital:

Address of physician or hospital:

HR USE ONLY

Reported on:

Reported by:

Claim No:

Claims Center:

Claim Handler:

Contact No:

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MECHANISMS FOR DEVELOPMENT, MONITORING AND CONTROL OF THIS POLICY

This policy will be developed and will complement the different policies that are approved within the TMG in direct relation to the general and specific principles of action established.

The TMG CSR Corporate Committee, a permanent internal body, with executive duties and faculties for providing information, advice and proposals within its action sector, acting in accordance with its established responsibilities, will present an annual report to the TMG, S.A. Board of Directors and/or delegate body authorized in this regard, on the degree of progress in compliance with the CSR policy and strategy.

The TMG CSR Corporate Committee Consist of the following executives:

Timothy P. Kerner, President; Dermot F. Murphy Jr., Chief of Staff; Frank Farnacci, Vice President; Merrick Colson, Managing Director National Accounts; Danielle Torres, Director of Human Resources & Pamela Sajnani, Senior Marketing Manager / Supplier Diversity Officer

* * * * *

Approved on 5.31.2022

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TMG's 2025 Green House Gas Emissions Report

Sustainability Overview

Reports

Groups



Powertrain and fuel types



Last year

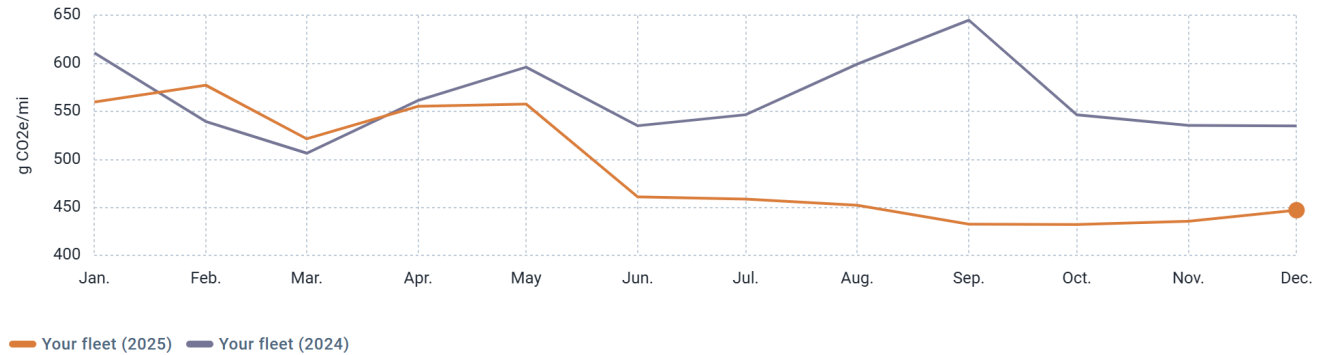
Clear

Emissions Trend

Emissions Intensity Tailpipe Emissions

468.13 ↓ 16%

g CO2e/mi



Sustainability Overview

Groups



Powertrain and fuel types



Last year

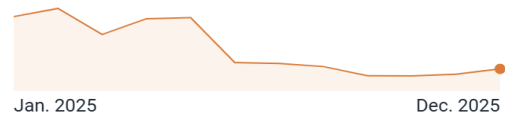
Clear

Emissions Intensity



468.13

g CO2e/mi



Tailpipe Emissions Avoided



2.19

Metric tons CO2e



Fuel and Energy Economy



18.76

MPG-e (US)



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