



The COMMENCEMENT GROUP

Corporate Social Responsibility Policy

Abstract

Our CSR Policy is quite simple. We have a long-term relationship MJG Promotions, with a small family owned factory in New Jersey a half hour drive from our main warehouse. They screen print 100% of our jobs. As we are their largest client, we have had a hand in their development and have a very close working relationship. Our staff are on their printing floor weekly to inspect our goods and chat with their staff. We have MJG Promotions print our clothing on blank goods ordered only from companies with strong CSR policies. Currently we are using exclusively Gildan product. While we do have an extensive policy with checks and balances, the reality is that because all of our product is produced a short ways away from our warehouse by a family run operation it is very easy for us to have honest open communication and make sure that everything is up to our standards.

CSR Policy

At The Commencement Group, we define Corporate Social Responsibility as follows:

- Conducting business in a socially responsible and ethical manner
- Protecting the environment and the safety of people
- Supporting human rights
- Engaging, learning from, respecting and supporting the communities and cultures with which we work

The Commencement Group will ensure that all matters of Corporate Social Responsibility are considered and supported in our operations and administrative matters and are consistent with The Commencement Group stakeholders' best interests. The Commencement Group is committed to being recognized as a leader in the field of Corporate Social Responsibility and recognizes that in doing so, we will add significant value for our shareholders.

This Policy applies to activities undertaken by or on behalf of The Commencement Group anywhere in the world.

All Commencement Group employees and contractors will adopt the Corporate Social Responsibility considerations described in this policy into their day-to-day work activities. The Commencement Group

leaders will act as role models by incorporating those considerations into decision-making in all business activities. The Commencement Group leaders will ensure that appropriate organizational structures are in place to effectively identify, monitor, and manage Corporate Social Responsibility issues and performance relevant to our businesses.

This Policy is built on the following areas that reflect existing and emerging standards of Corporate Social Responsibility:

Business Ethics and Transparency

The Commencement Group is committed to maintaining the highest standards of integrity and corporate governance practices in order to maintain excellence in its daily operations, and to promote confidence in our governance systems.

The Commencement Group will conduct its business in an open, honest, and ethical manner.

The Commencement Group recognizes the importance of protecting all of our human, financial, physical, informational, social, environmental, and reputational assets.

The Commencement Group will advise our partners, contractors, and suppliers of our Corporate Social Responsibility Policy, and will work with them to achieve consistency with this policy.

The Commencement Group is committed to measuring, auditing and publicly reporting performance on its Corporate Social Responsibility programs.

Environment Health & Safety

The Commencement Group is committed to protecting the health and safety of all individuals affected by our activities, including our employees, contractors and the public. The Commencement Group will provide a safe and healthy working environment, and will not compromise the health and safety of any individual. Our goal is to have no accidents and mitigate impacts on the environment by working with our stakeholders, peers and others to promote responsible environmental practices and continuous improvement.

The Commencement Group is committed to environmental protection and stewardship.

The Commencement Group recognizes that pollution prevention, biodiversity and resource conservation are key to a sustainable environment, and will effectively integrate these concepts into our business decision-making.

All employees are responsible and accountable for contributing to a safe working environment, for fostering safe working attitudes, and for operating in an environmentally responsible manner.

Stakeholder Relations

The Commencement Group will engage stakeholders clearly, honestly, and respectfully.

The Commencement Group is committed to timely and meaningful dialogue with all stakeholders, including shareholders, customers, and employees, indigenous peoples, governments, regulators, and landowners, among others.

Employee Relations

The Commencement Group will ensure that employees are treated fairly and with dignity and consideration for their goals and aspirations and that diversity in the workplace is embraced.

The Commencement Group will apply fair labour practices, while respecting the national and local laws of the countries and communities where we operate.

The Commencement Group is committed to providing equal opportunity in all aspects of employment and will not engage in or tolerate unlawful workplace conduct, including discrimination, intimidation, or harassment.

The Commencement Group will not tolerate harassment or abuse of any workers in any part of our supply chain.

The Commencement Group promotes fair and honest compensation, that adhere to minimum wage principals and living wage principals.

The Commencement Group promotes sustainable hours of work that abide by local laws. This includes a stable set of working hours that does not fluctuate significantly week to week. Working hours must be sufficient for full time employment, but not so high that they hurt the workers health.

Human Rights

The Commencement Group recognizes that governments have the primary responsibility to promote and protect human rights. The Commencement Group will work with governments and agencies to support and respect human rights within our sphere of influence.

The Commencement Group will not tolerate human rights abuses, and will not engage or be complicit in any activity that solicits or encourages human rights abuse.

The Commencement Group will always strive to build trust, deliver mutual advantage and demonstrate respect for human dignity and rights in all relationships it enters into, including respect for cultures, customs and values of individuals and groups.

The Commencement Group opposes Child Labor and will only contract with manufacturers who can prove they do not use child labor.

The Commencement Group promotes freedom association and collective bargaining and urges factories to support these principles.

The Commencement Group opposes forced labor and will not contract with factories who do not use free labor.

Community Investment

The Commencement Group stresses collaborative, consultative, and partnership approaches in our community investment programs.

The Commencement Group will integrate Community Investment considerations into decision-making and business practices, and will assist in local capacity building to develop mutually beneficial relationships with communities.

The Commencement Group will contribute to our host communities' quality of life by supporting innovative programs in health, education, social services and the environment, as well as cultural and civic projects.

The Commencement Group will strive to provide employment and economic opportunities in the communities where we operate.

Sustainability

The Commencement Group prioritizes sustainability and sustainable practices in all that we do. Only by deliberately changing practices can the world work to limit global warming and protect the planet.

The Commencement Group will work to reduce its carbon footprint whenever possible. This includes by switching over to renewable energy sources and by reducing waste. The Commencement Group will also work to reuse materials whenever possible and reduce the use of plastic, single use items, and unnecessary packaging. The Commencement Group aims to switch to zero waste production.

The Commencement Group will strive to make the supply chain as environmentally friendly as possible and use bulk shipping, infrequent trips, and lighter materials whenever options are available.

Supply Chain

