

# Pinnacle Group Policies and Procedures

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## Sustainable Procurement Report

<b>Revision Date</b>	August 1, 2021
<b>Doc. Owner</b>	Pinnacle Group Legal Department

## Executive Summary

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This policy document is designed to provide an overview of Pinnacle Group's Procurement policies and responsibilities.

## Material Issues Based on Pinnacle's Activities:

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### **Sustainability**

Pinnacle is analyzing the various aspects of this issue and the best ways to measure and report on them.

### **CSR – Corporate Social Responsibility**

Pinnacle has identified that Corporate Social Responsibility issues are material to the organization and its success. Pinnacle and its Supplier's compliance with Laws and Codes of Conduct are essential to the company's ongoing success.

## Definition of Metrics and Indicators:

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1. Process Indicators – Pinnacle measures and monitors the progress towards the achievement of its goals through the percentage of suppliers that are assessed on CSR issues – including the percentage of suppliers that execute the Supplier Subcontracting Agreement that contains the contractual obligation to adhere to the Laws, Rules, and Regulations as well as to the Codes of Conduct in the Agreement.
2. Output Indicators – Pinnacle monitors the actual performance of the suppliers by monitoring the feedback of its subcontractors to their managers, the Human Resources team or the anonymous reporting platform of MySafeWorkplace that includes the website: [www.mysafeworkplace](http://www.mysafeworkplace) or phone line of: 1-800-461-9330 where employees can anonymously report their concerns 24 hours a day, 7 days a week.

## Definition of Scope and Boundaries:

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This reporting includes all of the staffing suppliers for Pinnacle Group. Information will be collected and reported by Pinnacle's Legal Department, Human Resources Department, Compliance Department, and the Supply Chain Department on a quarterly basis.

## Quantitative Targets:

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Pinnacle's Supply Chain Department will continue to require the execution and adherence to the provisions in the Supplier Subcontracting Agreement requiring Suppliers to follow the Law and Code of Conduct listed. No Supplier will be onboarded without execution and adherence to this agreement.

Pinnacle's objective is to continue to monitor its employee hotline for any reports regarding any and all issues arising from its Suppliers. Should any issues be reported, Pinnacle will take immediate action to investigate and address the issues. Pinnacle will also continue to report and respond to any requests made by its customers and monitor its suppliers regarding all labor and human rights issues.

## Review Mechanisms Keeping Reporting Data Up to Date:

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Pinnacle Group Staffing Supplier data is reviewed and updated weekly. The data period in this report corresponds to the last 2 calendar years. Pinnacle Group's Sustainable Procurement Report is reviewed annually. The next review is scheduled for August 1, 2022. Any significant changes to activities or operations will be reviewed by the Legal Department outside of the annual review process and the Report will be amended as necessary.

## Alignment with Standards and Practices

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This report has referenced the GRI Standards framework (GRI 414: Supplier Social Assessment) to report the specific information included.

## Comparisons – Historic Figures

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Staffing Supplier Index	2019	2020
% of Staffing Suppliers signing Supplier Subcontracting Agreement with Legal and Code of Conduct Compliance stipulations	100%	100%
Number of Staffing Suppliers who have complained about CSR issues or have consultants who have reported complaints to Human Resources or reporting platform	0	0

## Communication to Internal and External Parties

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Pinnacle Group's Sustainable Procurement Report is provided to the Executive Team and Board of Directors for review and comment. The Report is posted to the Pinnacle Group website for public access and review.