

USA ENVIRONMENTAL, INC. EQUAL PAY POLICY

Introduction

USA Environmental, Inc. (or the Company) is committed to the principle of equal pay for comparable work and to complying with the Equal Pay Act of 1963 and other applicable laws regarding equal pay.

Equal Pay Statement

USA Environmental, Inc. recognizes the importance of, and is committed to, providing a fair, objective and transparent pay system that is free from gender bias and discrimination, and that eradicates pay discrimination in the workplace, including the following:

1. USA Environmental, Inc.'s policy is to provide equal pay to employees who perform comparable work, except if the pay difference is due to the following reasons:
 - A bona fide system that rewards seniority or merit;
 - A compensation system based on quantity or quality of production, sales or profits;
 - The employee's education, training or experience, to the extent that such factors are reasonably related to the specific work in question; or
 - Any other reasonable factor other than the sex of the employee.
2. USA Environmental, Inc. will not ask job candidates, or their current or past employers, about their current salary or salary history, except that:
 - When the candidate voluntarily discloses the information, the salary may be confirmed by USA Environmental, Inc., or
 - When an offer of employment has been made by USA Environmental, Inc. and the compensation negotiated with the candidate, USA Environmental, Inc. may confirm the candidate's salary history.
3. USA Environmental, Inc. will not ask candidates or employees, as a condition of employment or as a condition of continued employment, to refrain from asking, discussing, soliciting or disclosing information about their salary or that of other employees. However, USA Environmental, Inc.'s human resources personnel and other employees with access to this information are prohibited from disclosing the same without the written consent of the employee, unless the information arises from a public record. USA Environmental, Inc. will not provide employees' salary information to another employee or third party, unless required to do so in response to a valid subpoena or other applicable law.
4. USA Environmental, Inc. will not dismiss, threaten, discriminate, and/or retaliate against an employee with respect to the terms and conditions of his or her employment because the employee has:

- Disclosed his or her salary or has asked about or discussed the salary of other employees;
- Objected to any act or practice prohibited by the Equal Pay Act of 1963, or any other applicable federal, state or local law;
- Filed a complaint or claim under the Equal Pay Act of 1963, or any other applicable, federal, state or local law; and/or
- Offered or attempted to offer, verbally or in writing, any testimony, statement or information, as part of an investigation against USA Environmental, Inc. under the Equal Pay Act of 1963, or any other applicable federal, state or local law.

Annual Equal Pay Audit

USA Environmental, Inc. will conduct, on an annual basis, an equal pay audit of its compensation practices.

Objectives and Policy Implementation

USA Environmental, Inc.'s objectives relating to equal pay are to:

- Review USA Environmental, Inc.'s policies and practices to ensure consistency with equal pay principles;
- Eliminate any unfair, unjust or unlawful policies and/or practices that impact gender pay; and
- Take appropriate remedial action to correct gender based pay disparities.

To achieve these objectives, USA Environmental, Inc. will:

- Post this Policy in its worksites and include it as part of the Employee Handbook;
- Examine at least annually, on its own or through a third party, its internal and external recruitment processes;
- Provide jobseekers with a document that contains information on the employee equal pay policy and statutory protections;
- Carry out, at least annually, job evaluations and equal pay audits;
- Keep current on the topic of gender pay discrimination and provide training and guidance to employees involved in determining pay;
- Inform all employees of how compensation practices work and how their own pay is determined;
- Respond promptly to complaints and grievances of equal pay;
- Gather relevant information to assess the impact of this Policy; and
- Ensure that any differential in pay discovered is promptly corrected, unless it is due to any of the exceptions permitted under the law.

Definitions

For purposes of this Policy, and in accordance with the relevant legislation, the following terms will be defined as follows:

- “Employee” means any person who works for USA Environmental, Inc. and who receives compensation for such work;
- “Comparable work” means work that is similar since it requires substantially the performance of the same duties, effort, ability and responsibility and which is performed under similar conditions. The titles of the positions or the job descriptions alone will not determine whether the work is comparable;
- “Working conditions” will include the environment and other similar circumstances, commonly taken into consideration when setting salaries, including, but not limited to, work schedules, the physical environment, and the risks the employee is exposed to when performing his or her job; and
- “Salary” means every type of payment and every class of compensation or remuneration, including money, species, services, marginal benefits, facilities or a combination of any one of these which the employee receives for the performance of his or her work.

Complaints

Employees can raise their concerns and file complaints about possible breaches of this Policy with HR following USA Environmental, Inc.’s Open Door Policy and Complaint Procedure.

Responsibilities

Responsibility for this Policy and for ensuring that USA Environmental, Inc.’s policies and practices comply with equal pay legislation rests on the Vice President of HR/Administration.

Effective Date

This Policy is effective on Jan 1, 2022.

**ACKNOWLEDGEMENT OF RECEIPT
USA EQUAL PAY POLICY**

I, _____, acknowledge that I have received the Equal Pay Policy of USA Environmental, Inc. I accept that I have read and understand this Policy, and understand that, if I have any questions about the Policy, I am to ask my supervisor or representative of the Human Resources Department. I further accept that I will abide by the rules, regulations, policies and procedures set forth by USA Environmental, Inc., including by this Policy, and failure to do so, may result in disciplinary action up to and including termination.

Employee:

Signature

Date

Witness:

Print Name

Date

Signature