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	Approved by: Mark Whitney, EVP, General Counsel	

## 1. Purpose

Vibrantz Technologies Inc., on behalf of itself and its subsidiaries (collectively, “Vibrantz”) respects the dignity of individuals, the needs of our communities and recognizes the links between protecting the environment and respecting human rights. Our approach and how we conduct business are informed by international principles, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), Organization for Economic Co-Operation and Development’s (OECD) Guidelines for Multinational Enterprises, Universal Declaration of Human Rights (UDHR), International Bill of Rights, and the International Labor Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. We work to ensure that our policies and processes seek to prevent, mitigate, and remedy adverse human rights impacts to help achieve respect for human rights and promote decent work through our operations and supply chains. This policy should be read in conjunction with our Code of Ethics and our Supplier Code of Conduct.

## 2. Scope

We strive to adhere to the principles outlined below:

### Modern Slavery, Human Trafficking and Forced Labor

- complying with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes and ensuring that all work is conducted on a voluntary basis, not under threat or force of any kind.
- ethical recruiting based on the needs of the business and the talent of new applicants. Vibrantz does not require workers to pay any fees or deposits to Vibrantz or to authorized agents or recruiters to obtain or maintain employment.
- not restricting employees’ freedom of movement.
- providing employees with accurate and understandable information regarding their work, compensation and benefits.

### Child Labor

- prohibiting child labor by ensuring that individuals will not be hired who are not of the legal working age.

### Remuneration and Working Hours

- providing fair wages and benefits, compensating all workers with all legally mandated wages, including upon departure, and providing wages sufficient to meet basic needs and a decent standard of living.
- paying workers timely and not deducting pay as punishment.
- providing transparent pay information to workers in a timely manner with pay slips.
- providing standard weekly working hours, excluding overtime, defined by contract and providing adequate rest time.
- communicating clearly regarding overtime needs and payment of overtime wages.
- providing parental and pregnancy leave benefits as required by applicable law

### Freedom of Association and Collective Bargaining

- recognizing the freedom of workers to associate or not associate with a labor union, and to collectively bargain in accordance with law.
- respecting the right to freedom of association and to not undermine or pressure any employee from exercising this right.
- enabling constructive dialogue and good faith bargaining with union representatives.

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**Fair Treatment and No Discrimination**

- treating people with respect and dignity; providing an inclusive workplace.
- fostering a workplace free of harassment and discrimination including discrimination based on race, color, ethnicity, religion, disability, age, gender, gender identity, sexual orientation, political affiliation, union membership, marital status, pregnancy status or any other protected characteristic.
- prohibiting all forms of abuse, violence, intimidation or harassment in the workplace.

**Health and Safety**

- providing employees a safe, clean, healthy, and sanitary working environment that is compliant with all relevant laws.
- implementing relevant industry-specific procedures and safeguards against work-related accidents, illnesses, and injuries.
- providing employees with relevant training, first aid, and personal protection equipment (PPE)
- ensuring hazardous materials and chemicals are properly stored and managed by trained and competent personnel.

**Privacy**

- adopting practices to protect the personal information of our employees.

**Environmental Rights**

- respecting the right to a clean, healthy and sustainable environment.

**Critical and Conflict Minerals**

- our commitments are outlined in our Supplier Code of Conduct.

**3. Implementation**

Vibrantz works to provide appropriate processes and resources including trainings and audits to ensure the implementation and enforcement of this policy. We operate in a spirit of continuous improvement and are committed to increasing our capacity to identify and respond to concerns related to human rights including providing for and or cooperating in remedy.

In accordance with our Supplier Code of Conduct, we expect our suppliers to comply with contractual requirements and to respect human rights in a manner consistent with this policy, or such higher standards as required by law or contract.

**4. Compliance and Reporting**

We encourage our employees, suppliers, and stakeholders to speak up about any concerns related to human rights. We do not tolerate retaliation or reprisal against any workers, suppliers, or others for having reported contraventions of the implementation of our human rights approach.

Concerns related to the content of this policy can be reported via the Vibrantz Ethics Hotline, at <https://www.lighthouse-services.com/vibrantz-ethics>.