



## ERCO Worldwide Human Rights Policy

### Purpose and Scope

This Policy is intended to set out the commitment of ERCO Worldwide LP (together with its divisions, partnerships, affiliates and subsidiaries, including any and all internal governance bodies, "ERCO") to respect and promote human rights in our business operations and our relationships with our customers, suppliers and workforce throughout the world.

This Policy applies to every director, officer, and employee of ERCO. This Policy is intended to supplement all applicable local laws, rules and other policies of ERCO.

ERCO employees who are members of a labour union should refer to their collective bargaining agreement for specific application of this Policy.

### Policy Statement and Commitment

ERCO respects internationally recognized principles on human rights, as set out in the United Nations' Universal Declaration of Human Rights and the International Labor Organization's Declaration of Fundamental Principles and Rights at Work. In particular, our commitment includes the following:

1. We respect the rights, privacy, dignity and worth of all people and comply with all associated legal requirements.
2. We value and strive to enhance the diversity and inclusion of our workforce. We are committed to equal opportunity and do not tolerate discrimination or harassment on the basis of race, sex, ethnicity, religion, age, disability, sexual orientation, gender identification, political option, or any other grounds protected under applicable human rights laws.
3. We respect freedom of association and our employees' right to join, form or not to join a labour union without fear of reprisal or intimidation. ERCO is committed to bargaining in good faith with any legally recognized unions that represent our employees.
4. We are committed to maintaining a workplace free from violence, intimidation, harassment, or other unsafe conditions due to internal or external threats.
5. We prohibit the use, and are committed to the elimination of, all forms of forced labour, slavery, and any form of human trafficking.



6. We prohibit the hiring of individuals that are under the age of 18 years of age for positions in which hazardous work is required and we otherwise comply with minimum age work requirements in the jurisdictions in which we operate.

## Monitoring and Reporting

We are committed to complying with applicable human rights, privacy, employment and labour laws where we operate. We are also committed to monitoring and assessing risks to avoid actual human rights violations; training our personnel regarding our human rights commitments; and communicating with our customers, supplies and personnel regarding our human rights commitments.

Any employees who have questions about this Policy or would like to confidentially report a potential violation of this Policy, should raise those questions or concerns with their manager, ERCO's Vice President, Human Resources or ERCO's General Counsel ("CLO").

All employees are responsible for promptly reporting any incidents that they believe constitute discrimination. Every complaint received will be investigated in accordance with the Complaints Process set out below. Managers who receive a complaint must promptly contact the Vice President, Human Resources or the CLO.

Individuals can also report suspected violations through the Confidence Line or otherwise in accordance with the terms of *Reporting and Whistleblower Policy*.

## Complaint Process

1. If you believe you are being discriminated against, where appropriate, bring the matter to the attention of the person responsible for the conduct and talk to your manager.
  - Keep a record of incidents (dates, times, locations, possible witnesses, what happened, your response). You do not have to have a record of events in order to make a complaint, but a record can strengthen your case and help you remember details over time.
  - If you do not wish to bring the matter directly to the attention of the person responsible, or where such an approach is attempted and does not produce a satisfactory result, you should seek the advice of a representative from Human Resources. You may seek advice without making a formal complaint.



2. Dealing with a complaint: A complaint of discrimination should be made directly to ERCO's Vice President, Human Resources or the CLO. Once a complaint is made, employees are expected to cooperate in the investigation of the complaint.
3. The complaint should describe:
  - Basis of the complaint (prohibited ground or grounds);
  - What happened: the behaviours (who said what, who did what) with as much detail as possible, including the dates, times, exactly what happened, others involved, and including the adverse impact you and/or others experienced;
  - Exactly who the complaint is against; and
  - Others who should be contacted during the investigation.
4. Upon receipt of a complaint of discrimination, an investigation will be conducted. If a person is alleged to have engaged in discriminatory behavior, that person will be notified of the allegations and provided with an opportunity to respond. At a minimum, the two persons will both be interviewed by the Vice President, Human Resources of ERCO (or designate), along with any individuals who may be able to provide relevant information.

In all cases brought to its attention, ERCO undertakes to be fair to both the employee making the complaint and the person whose conduct is the subject of the complaint.

If the employee withdraws his/her complaint before a resolution, the Vice President, Human Resources reserves the right to proceed with the investigation and reach a resolution of the matter, if in his/her judgment such action is appropriate.

## Resolution

If any investigation reveals evidence to support that conduct contrary to this Policy has occurred, appropriate remedial action will be implemented. Both the individual who raised the complaint and the person whose conduct is complained about will be advised of the outcome of the investigation. Non-compliance with this Policy may result in disciplinary action up to and including termination of employment.

## Confidentiality

Confidentiality of the identity of the parties and the circumstances relating to the complaint will be maintained except when disclosure is necessary for investigating the complaint or taking appropriate remedial measures, or where ERCO is legally compelled



to disclose the information.

## **No Reprisal**

Regardless of the outcome of a complaint made in good faith, there shall be no retaliation against any individuals who in good faith raise questions, concerns, or a complaint under this Policy or any individuals providing information in relation to a complaint. Complaints of discrimination will be treated very seriously.

However, malicious complaints may result in disciplinary action against the individual who filed the complaint, up to and including termination of employment.

## **Review of the Policy**

The Board may make revisions to this Policy from time to time. Any changes to this Policy must be approved by the Board.