

INTRODUCTION

INDEVCO North America, Inc. (“INDEVCO”) and our member companies strive to maintain a working environment, both internally and through our suppliers, that respects the human rights of all individuals and ensures equal opportunity. We operate in accordance with applicable laws and labor standards, policies, and our Business Code of Conduct and Supplier Code of Conduct. Our Human Rights and Labor Standards Policy applies to all INDEVCO facilities and employees, and we require adherence to these standards.

OUR COMMITMENT

INDEVCO is committed to conducting business in a manner that demonstrates respect for the dignity of all people and for internationally recognized human rights. Specifically, we conduct our business with the following principles:

Respecting the Dignity of All People

INDEVCO believes in creating a culture where everyone feels welcome. This starts by respecting the dignity of each other and embracing the diversity that makes us who we are. This is our fundamental commitment in the communities in which we live and operate.

Freedom from Forced Labor

INDEVCO respects the rights of all people, so we will not use or engage in any form of intimidated, bonded, or indentured labor. All work is voluntary, and employees are free to leave or end their employment in accordance with local and national laws without fear of physical, psychological, sexual, or verbal abuse. INDEVCO prohibits the use of slavery and human trafficking in our facilities and by our suppliers and business partners. Slavery includes forced labor, in addition to bonded labor and domestic subjugation.

Rights of Children

INDEVCO does not allow child labor in our operations. The term “child” means any person under the minimum legal age for being employed in the workplace which, in most cases, is 15 years old. Typically, we do not hire anyone under 18 years old, unless apprenticeships or internships are permitted by local law.

Rights of Indigenous Peoples

INDEVCO will not take actions which breach the rights and customs of indigenous peoples, including rights to autonomy, self-determination, and retaining of own customs and institutions.

Fair Compensation

INDEVCO believes in fairly compensating our team members according to local markets. We comply with all applicable minimum wage, overtime, and benefits practices that relate to applicable local and national laws and regulations; we require our suppliers to do the same. In a country where no

minimum wage law applies, we pay our employees at a rate comparable to the prevailing industry average of that country.

Hours of Labor

INDEVCO ensures that working hours are consistent with local regulations, customs, and common practice and are not excessive, except where operational circumstances dictate otherwise.

Work Environment

INDEVCO is committed to providing a workplace that is respectful and free from all forms of unlawful discrimination and harassment, including national origin or ancestry, citizenship, age, religion, race, sex, sexual orientation, and abilities, among others. We will maintain a healthy, clean, and safe work environment and will not utilize mental or physical disciplinary practices. We will construct and maintain all facilities in accordance with the standards set forth by applicable laws and regulations in the countries in which we operate.

Immigration Law & Compliance

INDEVCO only employs workers with a legal right to work. We validate all workers' legal status in accordance with applicable law before they can begin work.

Freedom of Association

INDEVCO respects the freedom of association. We will cooperate in good faith with labor unions that may represent our employees within the proper national legal frameworks.

EQUAL EMPLOYMENT OPPORTUNITY

INDEVCO provides equal employment opportunity to qualified persons without regard to race, color, gender, sexual orientation, gender identity, pregnancy, religion, creed, national origin, veteran status, disability, age, genetic information, genetic predisposition, or any other category protected by local, state, or federal law. Our policy relates to all phases of employment, including recruitment, hiring, promotion, training, demotion, transfer, layoff, recall, and termination, rates of pay, employee benefits, and participation in all company-sponsored employee activities.

TRAINING

Employees are provided training on discrimination and harassment prevention and creating a respectful workplace environment. Specifically, managers are provided with training on additional responsibilities of handling employee concerns around discrimination and harassment.

DISCRIMINATION, HARASSMENT AND RETALIATION

To eliminate and reduce perceived workplace discrimination, harassment, and retaliation, INDEVCO uses an internal investigation process to respond to complaints of such conduct. Anyone who believes he or she has been subjected to discrimination, harassment, or retaliation, or who has witnessed such conduct, must report the conduct as outlined in our Business Code of Conduct. Employees are expected to make honest complaints and participate in investigations.

Confidentiality

In all cases involving a report of harassment, discrimination, or retaliation, INDEVCO will make all reasonable efforts to maintain confidentiality to the extent necessary under the specific circumstances of each case. Whether employees will be required to maintain the confidentiality of an investigation will be determined by the significance of the case. For example, employees may be instructed to maintain confidentiality if we recognize a need to protect witnesses, avoid destruction of evidence, ensure truthfulness of testimony, prevent a cover-up, or some other legitimate reason specific to the specific investigation.