



# Human Rights Process Document

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## 1. Our Commitment and Framework Alignment

We are committed to conducting business with integrity, complying with applicable laws, and respecting internationally recognized human rights. These commitments are embedded in our Business Conduct Standards and integrated into our operations and decision-making processes.

Our approach aligns with leading international frameworks, including:

- Universal Declaration of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises

We are a member of the Responsible Business Alliance (RBA) and align our practices with the RBA Code of Conduct. Our Supplier Code of Conduct reinforces expectations for safe working conditions, dignified treatment, environmental responsibility, and ethical business conduct throughout our supply chain.

## 2. Core Human Rights Principles

### Respect, Equality, and Dignity

We promote a workplace culture grounded in integrity, equal opportunity, and respect. Employment decisions are merit-based, and discrimination, harassment, and retaliation are not tolerated.

### Safe and Fair Working Conditions

We provide safe and healthy working conditions and comply with applicable health and safety laws. We proactively identify and mitigate workplace risks and support continuous improvement.

We provide fair compensation and benefits in compliance with wage, working hours, overtime, and benefits laws, and ensure transparent wage statements.

We respect employees' rights to freedom of association and collective bargaining in accordance with applicable laws.

### Prohibition of Forced Labor and Child Labor

We prohibit all forms of forced labor, modern slavery, human trafficking, and child labor. These standards apply to our operations and to our suppliers and business partners.

### 3. Risk-Based Due Diligence and Supply Chain Controls

To prevent, identify, and address human rights risks, particularly forced labor and child labor, we implement a structured, risk-based due diligence approach that includes:

- Annual Human Rights Impact Assessments, covering operations and relevant supply chain tiers
- Supply chain risk mapping and prioritization
- Supplier onboarding assessments and periodic risk screening
- Supplier self-assessment questionnaires aligned with the RBA Code of Conduct
- Documentation review and verification, including age verification and legally compliant recruitment practices
- Third-party audits, including RBA Validated Assessment Program (VAP) audits where appropriate
- Corrective action plans, remediation tracking, follow-up verification, and escalation procedures, including potential termination of non-compliant suppliers

We maintain documented records of assessments, audits, corrective actions, and remediation activities to ensure traceability, accountability, and verification.

### 4. Responsible Operations and Broader Impacts

#### Privacy and Data Protection

We protect personal and proprietary information and safeguard data against unauthorized access, use, or disclosure.

#### Responsible Innovation

We support human rights through responsible innovation, knowledge sharing, and technologies that advance connectivity and learning.

#### Environmental Responsibility

We recognize the interconnection between environmental stewardship and human rights and are committed to minimizing environmental impacts.

#### Community Engagement

We contribute positively to the communities where we operate through financial support, volunteering, and partnerships.

### 5. Reporting, Training, and Accountability

We encourage employees and stakeholders to report concerns in good faith through established reporting channels. Retaliation against individuals who raise concerns is not tolerated.

All employees are required to adhere to our Business Conduct Standards and complete relevant compliance training. Role-specific training is provided and required for employees with elevated human rights or supply chain responsibilities.

## 6. Governance and Oversight

We maintain a structured human rights governance framework supported by cross-functional leadership and executive oversight. Our commitments and due diligence processes are regularly reviewed and updated, and significant updates are reviewed and approved by the Board of Directors.

This framework is designed to prevent, identify, mitigate, and remediate adverse human rights impacts across our operations and value chain while strengthening transparency and accountability.