

Human Rights Due Diligence Framework

Overview

This Human Rights Due Diligence Framework sets out the approach we use to identify, assess, prevent, mitigate, and, where appropriate, address actual and potential adverse human rights impacts associated with our operations, supply chain, and business relationships.

Our approach is informed by internationally recognized human rights standards, including the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. In particular, we recognize the importance of dignity, equality, non-discrimination, freedom of association, the effective recognition of the right to collective bargaining, the elimination of forced labor, the abolition of child labor, and the elimination of discrimination in respect of employment and occupation.

This framework is guided by principles of accountability, stakeholder engagement, transparency, and continuous improvement that supports an ongoing, commitment to human rights due diligence.

Framework Components

1. Policy Commitment

We maintain policies, codes of conduct, and standards that reflect our commitment to respect internationally recognized human rights and labor rights. These include principles relating to dignity, equality, non-discrimination, fair treatment, and respect for fundamental rights at work. We communicate related expectations to employees, suppliers, contractors, and other business partners.

2. Governance and Accountability

Oversight and implementation responsibilities are assigned across relevant leadership and management functions to support the accountability, escalation, and decision-making necessary to meet our policy commitments related to human rights and labor rights.

3. Risk Identification and Assessment

We assess actual and potential human rights impacts across our operations and value chain, with attention to higher-risk geographies, activities, business relationships, and potentially vulnerable groups. Our assessments may consider risks related to forced labor, child labor, discrimination, harassment, working conditions, freedom of association, and other relevant human rights impacts.

4. Stakeholder Engagement

We seek to engage, as appropriate, with relevant stakeholders, including workers, suppliers, communities, and other potentially affected groups, to inform our understanding of the risks of human rights violations and the necessary response measures. We recognize that meaningful engagement can strengthen the identification and management of adverse impacts.

5. Integration into Business Processes

Human rights and labor rights considerations are integrated, into relevant business processes, including sourcing, procurement, supplier management, operations, compliance, human resources, and broader risk management activities.

6. Prevention and Mitigation

Where risks or adverse impacts are identified, we seek to implement measures designed to prevent, mitigate, or otherwise address them. These measures may include controls, training, reaffirming supplier expectations, corrective actions, and ongoing management oversight, with particular attention to any severe risks affecting workers and other rights-holders.

7. Grievance and Remediation

We recognize the importance of accessible channels for reporting concerns related to workplace rights and other human rights issues. We openly encourage our employees, contractors and third parties to utilize our companywide Integrity Helpline - a confidential channel through which anyone can raise concerns about potential violations of our values, policies or applicable laws. If we determine that we have caused or contributed to an adverse human rights impact, we will seek to address it through appropriate remediation processes.

8. Monitoring and Continuous Improvement

We monitor the effectiveness of our due diligence activities through periodic review, management processes, and updated risk assessments. We use lessons learned to strengthen the framework over time and to respond to evolving human rights and labor rights risks.

9. Transparency

We communicate our approach and progress through relevant disclosures and other appropriate communications, recognizing that transparency supports accountability and continuous improvement.

Ongoing Application

This framework is intended to operate as an ongoing process rather than a one-time exercise. We seek to strengthen our approach over time, respond to evolving risks, and support responsible business conduct consistent with respect for internationally recognized human rights and fundamental principles and rights at work.