



## KDC/ONE HUMAN RIGHTS POLICY

*This kdc/one Human Rights Policy complements and must be read in conjunction with the kdc/one Code of Business Conduct & Ethics and with the kdc/one Supplier Code of Conduct, as applicable.*

### Purpose and Scope

This kdc/one Human Right Policy ("Policy") has been adopted by Knowlton Development Corporation, Inc. and its subsidiaries ("kdc/one", "we" or "our") for promoting the importance of human rights throughout our relationships with our various stakeholders, with the goal of increasing the enjoyment of human rights within the communities in which we operate.

We engage our suppliers and business partners to implement policies based on the same principles.

Senior leadership team and directors and managers are responsible of ensuring the proper implementation of this Policy, and to coordinate and implement plans and programs regarding these important objectives, with the engagement of the whole organization.

This Policy sets forth the standards that must guide the behaviors and actions of our entire team (from officers, directors and members of management to all our employees) and of our suppliers and business partners.

### Our Commitment

kdc/one values of compassion, well-being, inclusion, accountability, innovation, passion, and excellence guide our interactions with our employees, customers, communities, business partners, and investors. Respecting human rights is an integral part of these values. While governments have a key role in respecting, protecting, promoting and fulfill the human rights of their citizens, we recognize that companies share these responsibilities, both within their own operations and through business relationships. In line with our commitment and beliefs, we comply and promote all applicable Human Rights Laws and we do not enter into business with partners and countries that do not share our same human rights principles.

### References

Our commitment to Human Rights is guided by the key principles set forth in the following international documents:

- [International Bill of Human Rights \(i.e., Universal Declaration of Human Rights and the International Covenants on Economic, Social and Cultural Rights and Civil & Political Rights\).](#)
- [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)
- [United Nations \(UN\) Guiding Principles on Business and Human Rights](#)



- [UN Convention on the Rights of the Child](#)
- [UN Convention on the Elimination of All Forms of Discrimination against Women](#)
- [UN Women's Empowerment Principles](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [ILO General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs](#)
- [Paris Climate Agreement](#)
- [Minamata Convention](#)
- [Stockholm Convention](#)
- [Basel Convention](#)
- [The Ten Principles of the UN Global Compact \(UNGC\)](#)

## **Our Approach**

This Policy applies to all kdc/one employees, locations, and operating companies and we expect our suppliers and business partners to implement same principles. We expect our employees to act lawfully toward other employees, colleagues, business partners, and those in local communities as outlined in our kdc/one Code of Business Conduct & Ethics. All employees are required to review this Policy and our kdc/one Code of Business Conduct & Ethics, which covers human rights topics as part of our social responsibilities. All suppliers and business partners are required to review this Policy and our kdc/one Suppliers Code of Business Conduct.

## **Reference Documents**

- kdc/one Code of Business Conduct & Ethics
- kdc/one Supplier Code of Business Conduct

## **Engaging Stakeholders**

We acknowledge that respecting human rights is an enormous but important challenge. Progress will be made through a journey of collaboration and engagement with our stakeholders. We seek meaningful consultation with external stakeholders, including critics and recognized human rights thought leaders. We strive to work cooperatively with governments and reputable organizations to make progress in addressing challenges we may face. We seek to understand the nature and context of the evolving human rights journey and how we can make a difference.



## **Training**

We continuously work to strengthen education and develop awareness-raising tools regarding our commitment to respecting human rights. Training courses are made available to our employees as a resource, based on role and location to maximize relevance and impact. We're committed to promote same principles through collaboration and exchange with our suppliers and business partners.

## **Our Employees**

We are committed to upholding human rights throughout our relationships with our employees and to promoting a safe, inclusive, and diverse work environment where all employees feel welcome and valued. These commitments, also underlined in our kdc/one Code of Business Conduct & Ethics, include, among others:

- Complying with laws and practices that prohibit child labor, forced, bonded or indentured labor, illegal, clandestine, or undeclared employment, involuntary prison labor, human trafficking and unfair wages and benefits
- Providing a healthy and safe workplace free from intimidation, violence or threats of violence
- Providing a workplace free from discrimination based on race, religion, color, national origin, age, sex (including pregnancy), physical or mental disability, medical condition, genetic information, gender identity or expression, sexual orientation, marital status, protected veteran status, or any other legally protected status
- Treating everyone impartially and with respect; avoiding stereotyping, discrimination and prejudice
- Promoting equal employment opportunities and healthy work-life balance
- Promoting a harassment-free workplace where employees are treated with respect and dignity
- Acknowledging and respecting different beliefs, values, and practices
- Refraining from aggressive, passive-aggressive, or confrontational behavior and communication
- Interacting and communicating with others in an open, compassionate, and positive manner
- Protecting employees' personal information
- Encouraging open communication between managers and employees

We have procedures and practices in place to evaluate and address workplace concerns raised by employees, and to ensure compliance with this Policy and applicable laws.

## Our Supply Chain

Our suppliers and other business partners are integral to the success of our company. Our kdc/one Supplier Code of Conduct establishes expectations for our partners to respect internationally recognized human rights practices, comply with all applicable laws and conduct their business ethically and responsibly. We monitor and support our supply chain in pursuing these policy principles and commitment, without entering in business with partners and countries that do not share our same human rights principles.

## Our Communities

At kdc/one, we care deeply about people, our local communities, and the world. We respect the human rights of all persons in the communities in which we conduct business and recognize that we must be responsible for environmental stewardship. We strive to be socially responsible in the use of company resources for the long-term benefit of society, with the goal of increasing the enjoyment of human rights within the communities in which we operate. We support our employee efforts to make a difference in their local communities.

## Our Due Diligence Approach

Human rights due diligence consists of the processes that we follow to manage actual and potential impacts on individuals' human rights while engaging key stakeholders throughout the processes. We work to promote sustainable practices, support value creation, and assess both actual and potential adverse human rights impacts. We strive to implement and improve systems in business relationships across our value chain to mitigate risks.

Our approach comprises the following:



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*Figure 1 – Human Rights Due Diligence Approach*

- **Assess & Identify:** Actual or potential impacts on people, using a risk-based approach

*Key questions: What risks to people could we be connected to? Which ones should we focus on?*

- **Integrate & Act:** Take steps to prevent adverse impacts from occurring; mitigate their likelihood and severity; leverage our business relationships to influence; and work to enable an effective remedy

*Key question: What actions should we take to address the risks?*

- **Track & Monitor:** The effectiveness of our business process for assessing and addressing adverse impacts

*Key question: How do we know if our actions are working?*

- **Communicate:** Share information with stakeholders on how we address adverse impacts and risk, including, where appropriate, through public reporting

*Key questions: What do we need to communicate? To whom?*

- **Engage stakeholders:** Engage with our business partners and stakeholders to understand potential human rights impacts and develop meaningful actions to work to address adverse impact

*Key question: Who do we need to engage with through this process?*

## Remediation and reporting

We are committed to use our best efforts for providing effective resolution where we have caused or contributed to adverse human rights impacts. When we find impacts directly linked to our business relationships, we will use our influence to encourage our suppliers or business partners to promptly prevent, mitigate and address adverse impacts on human rights. [EthicsPoint](#), the kdc/one ethics reporting system, provides a global, accessible channel for reporting concerns, and is available 24 hours a day, 7 days a week. It is independent, secure and confidential, offering a safe mechanism for anonymous reporting (where **permitted by** local law) of suspected concerns or potential violations of this Policy or the law.

## Governance and Oversight

Every employee is responsible for respecting human rights. The kdc/one Environmental, Social Governance Committee, a cross-functional team of senior leaders representing functional groups and reporting to the Board, oversees our enterprise-wide human rights due diligence program. Periodic meetings provide a forum for updates on human rights topics and allow a mechanism for elevating issues to the kdc/one Executive Committee, our Board of Directors and other Board Committees if warranted.