

# Human Rights & Workforce Management (HRWM) Policy

## Scope:

This Policy Statement applies to CTDI, its subsidiaries, and other owned entities (collectively the “Company”) and to such entities’ shareholders, directors, officers, employees and agents (“Company Representatives”).

It sets forth the Company’s clear commitment to respect human rights in the Company’s operations.

This Statement complements our Supplier Code of Conduct.

## Human Rights Policy Statement:

This statement is uniquely our own. However, in its development, we considered for purposes of guidance, a number of international instruments, including the United Nations Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights, and the International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work.

The Company is committed to respecting the recognized human rights principles aimed at promoting and protecting human rights in the countries in which we operate. We recognize that governments are ultimately responsible for establishing the legal framework to protect human rights within their jurisdictions.

Consistent with our commitment, we:

- strive to eliminate forced labor, child labor, human trafficking and other forms of modern slavery from our operations;
- strive to eliminate unlawful discrimination from our operations;
- work to establish safe and healthy working conditions;
- value diversity as part of our business strategy;
- comply with applicable wage, work hours, overtime and benefits laws, and seek to compensate employees competitively;
- respect principles of freedom of movement, freedom of association and the right to collective bargaining in accordance with the applicable law; and,
- strive to play a positive role in advancing responsible and sustainable development, and improving standards of living.

We believe one of the best ways to fulfill our commitment to respect human rights is to build a culture of trust and respect throughout our organization. We seek to achieve this in many different ways, and are continuously looking for ways to improve on our efforts.

We work hard to make the Company an outstanding employer and corporate citizen, and encourage dialogue and engagement throughout our organization with internal and external stakeholders.

## Our Business Partners:

We recognize the roles played by suppliers, vendors, customers, and other business partners in helping us fulfill the objectives in this Statement.

We expect our business partners to share the Company's commitment to respect human rights, as set forth in this Statement. This commitment is incorporated into our Supplier Code of Conduct, available here: [Supplier Code of Conduct](#).

Each entity in our business partner network should seek to undertake its own efforts to address human rights issues consistent with the above.

### Operationalizing These Commitments:

As part of our commitment to respect human rights, we have undertaken to establish internal and external mechanisms to help identify, prevent, mitigate, and address potential adverse human rights impacts that may be directly linked to, or caused or contributed to, by our actions.

Many of these mechanisms already exist and are integrated into our operations through established policies, which include, but are not limited to the following:

- Our [Open Door Policy](#), to which employees with grievances may lodge complaints – anonymously and otherwise – without fear of retaliation;
- Our ["Contact Us" Portal](#), to which the public can reach out and contact us for questions or concerns about CTDI products, services, or our team.
- Our [Supplier Code of Conduct](#), and,
- Our other various policies and procedures that cover our employment relationships.

We strive to review the operationalization of this Statement with a goal toward the continuous improvement of our ability to fulfill our commitments.

Our Risk Management and Compliance Governance Board is responsible for coordinating the operationalization of our commitments across the Company.

### Stakeholder Engagement:

Consistent with our commitment to dialogue and engagement, we consult with relevant internal and external stakeholders to understand human rights-related concerns and issues, and to assess and escalate them as appropriate.

### Reporting Issues Related To Our Commitment To Respect Human Rights:

Reports of illegal or unethical behavior, including adverse human rights impacts can be made using the Open Door Policy or, if outside of the organization, the "Contact Us" Portal.