



Human Rights Policy

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<p>Business Owner / Department Chief Operating Officer / Corporate</p>	<p>Document Custodian Chief Operating Officer</p>

Procom Consultants Group Ltd. and its subsidiaries, affiliates and related entities ("Procom") are committed to respecting and defending human rights consistent with the principles outlined in internationally recognized standards, including the *Universal Declaration of Human Rights* and the International Labor Organization's *Declaration on the Fundamental Principles and Rights at Work*.

Our *Human Rights Policy* (this "Policy") outlines our framework for protecting human rights within our organization and broader sphere of influence, including our responsibilities and expectations for our employees and business partners.

This Policy applies globally to Procom employees and, as far as reasonably achievable, to our supply chain through our suppliers, clients, and partners. Where this Policy and local legislation do not impose the same standard, Procom will adhere to the higher standard unless otherwise prohibited.

OUR COMMITMENT TO HUMAN RIGHTS

Procom has been committed to doing the right thing since we opened our doors in 1978, insisting that our suppliers be paid fairly and transparently. Almost 50 years later, that commitment to respecting the rights and dignity of everyone we work with or otherwise impact continues to inform everything we do both strategically and operationally.

Our purpose is to help people make progress, and every decision we make is driven directly by our leadership ethos and our core values – our CREDO¹.



¹This expression of our CREDO values is contextualized to human rights. For more general information about our CREDO values, please visit <https://procomservices.com/en-us/about-us/values/>



OUR RESPONSIBILITIES AND EXPECTATIONS

Procom Leadership

Our managers and leaders hold the primary responsibility for protecting human rights within our operations. All our policies and processes are designed to be human-centric, ensuring that we view everything we do through a human rights lens.

Managers and leaders are responsible for overseeing the ERM and IRS, as well as administering this Policy within their reporting lines. They are expected to:

- Comply with human rights principles and build awareness across our industry and supply chain.
- Act in accordance with our CREDO values, this Policy and the Code of Conduct.
- Ensure all corporate policies and processes are consistent with our CREDO values and this Policy.
- Investigate breaches of this Policy and the Code in accordance with prescribed procedures.

Employees and Suppliers

They receive training on the Code of Conduct and this Policy during onboarding and annually thereafter. Employees and suppliers are responsible for respecting the human rights and dignity of everyone they encounter, and they are expected to:

- Act in accordance with our CREDO values, this Policy and the Code of Conduct.
- Take all necessary measures to respect and protect human rights and avoid abuses by following approved processes and immediately sharing any concerns that arise in relation to those processes.
- Report any suspected violations of this Policy or the Code of Conduct immediately.

Clients and Vendors

Procom seeks to work with people and entities that share our core values and our commitment to human rights principles. We expect our business partners to respect human rights and take measures to ensure their practices and operations do not infringe on those rights. In cases where such measures are not taken or where a business partner is found to have infringed on someone's human rights, we reserve the right to terminate the business relationship. Clients and vendors are responsible for respecting human rights in their operations and activities and are expected to:

- Act in accordance with our shared values and this Policy.
- Report any suspected violations of this Policy or the Code of Conduct by Procom employees or suppliers immediately.
- Cooperate with Procom in investigating any suspected violations of this Policy or the Code of Conduct by Procom employees or suppliers.

OUR HUMAN RIGHTS POLICIES

Accessibility

Procom is committed to fulfilling the requirements of applicable accessibility and human rights legislation by ensuring equal access and participation for people with disabilities in a way that allows them to maintain their dignity and independence. For more information on the steps we are taking to meet those requirements and improve opportunities for people with disabilities, please see our [Accessibility Plan](#).

Anti-Bribery and Anti-Corruption

Procom complies with the U.S. *Foreign Corrupt Practices Act* and Canada's *Corruption of Foreign Public Officials Act* as well as all applicable local and international anti-corruption and anti-bribery laws. We are committed to ensuring the effective operation of anti-corruption best practices throughout our supply chain and condemn corrupt practices in the strongest terms. Any employee or supplier who engages in corrupt practices is in violation of our *Code of Conduct*.

Child Labour

Procom does not support the use of child labour, either directly or through suppliers, and will always adhere to the legal age requirements, including minimum age for admission to employment, in the countries in which we operate.

We have adopted the definition provided by the [International Labour Organization \(ILO\)](#), whereby child labour is understood as work that "deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development." As outlined in *ILO Convention 138* and *ILO Convention 182*, children are engaged in child labour when they:

- are below the minimum age,
- do hazardous work, or
- do work which interferes with their education.

Equal Opportunity and Non-Discrimination

We are an inclusive organization and actively promote equality of opportunity for all with the right mix of talent, skills, and potential. We believe that a diversified team of individuals will help us to be competitive, strong, and successful in the global community. This commitment extends to ensuring that our clients and suppliers avoid discrimination toward Procom suppliers and employees. For more information, see our *Employment Equity Policy*.

Fair Employment Practices

Procom is committed to supporting fair and ethical employment practices across our supply chain, including but not limited to the following:

- Treating all employees and suppliers fairly and honestly regardless of where they work.
- Providing all employees and suppliers with written contracts, with agreed terms and conditions, including notice periods on both sides.
- Providing fair working conditions and hours in accordance with applicable legislation, including breaks, accommodation, vacation, overtime and leaves of absence.

Fair Wages

All workers have a right to fair compensation for their work. Procom is committed to ensuring that employees and suppliers receive fair and lawful compensation for their work, consistent with international standards and applicable legislation and regulation, including minimum wage and employment benefits.

Harassment, Discrimination, Bullying and Violence

A respectful workplace is one that values dignity, courteous conduct, fairness, positive communication and professional working relationships. A respectful workplace is free from workplace harassment, discrimination, bullying and violence.

Procom is committed to providing a work environment in which everyone is treated with respect and dignity in accordance with our *Respectful Workplace Policy*. We do not tolerate any kind or manner of harassing, bullying, discriminatory or violent behaviour by or toward employees, suppliers, clients, vendors or anyone visiting a Procom worksite or interacting with our employees or representatives.

Clients and suppliers are likewise expected to provide a working environment free from any form of harassment, bullying, discrimination, violence or otherwise abusive behaviors.

Health and Safety

Procom is committed to maintaining a safe and healthy workplace and to ensuring the health and well-being of everyone in the workplace. We take all reasonably practical actions to prevent workplace injury and illness and to meet – or exceed – applicable health and safety requirements.

Every individual must protect their own health and safety by working in compliance with the law and with our *Health and Safety Policy* and associated safe work practices and procedures.

We will continue to work collaboratively with our employees, suppliers and clients to create a physically and psychologically safe workplace.

Modern Slavery and Human Trafficking

Procom condemns and has zero tolerance for modern slavery, forced work or human trafficking. We comply with modern slavery and human trafficking laws to ensure our operations are free from these practices and condemn and prohibit the use of any and all types and forms of modern slavery, human trafficking and forced work, including slave, prison, indentured or bonded work.

Privacy

We respect the right to privacy for all stakeholders and are committed to protecting it within our business operations. We will only collect and use personal information in accordance with legal requirements, your consent or as otherwise required by applicable law.

We have established robust policies and procedures for managing the collection and processing of personal information² in accordance with applicable legislation and internationally accepted privacy principles.

If you have questions or concerns about our privacy practices or if you would like to review our Privacy Policy, please visit www.procomservices.com/privacy-policy or contact our Privacy Officer at privacyofficer@procomservices.com.

Sustainability

Procom is committed to doing our part as a responsible corporate citizen by modelling a sustainability mindset and best practices for our partners, across our supply chain and throughout the staffing industry as a fundamental expression of our commitment to our CREDO values.

We are a proud signatory of the Net-Zero Challenge and are taking action to support and contribute to Goal 12 (Responsible Consumption and Production) and Goal 13 (Climate Action) of the United Nations' *Sustainable Development Goals* to promote prosperity while protecting the planet.

For more information, see our [Sustainability Policy](#).



²“Personal Information” is understood as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person.

REPORTING CONCERNS

Questions about the Policy

If you have any questions about whether a situation violates this Policy, or if you would like more information about related programs and processes, we encourage you to speak with us:

- Employees should speak with their reporting manager or the People and Culture Team.
- Candidates and suppliers should contact Client Services.
- Clients and vendors should speak with their Procom Account Manager.

Safe Disclosure and Reporting Protocol

Procom provides a confidential and safe avenue to report a violation of this policy, including suspected corrupt or illegal behaviour on the part of Procom, the Client or any of their personnel or representatives. Suspected violations should be reported immediately to the Procom Legal Department at legal@procomservices.com.

All reports will be treated confidentially, investigated and resolved in accordance with applicable legislation and our policies and procedures, in cooperation with the appropriate legal authorities where appropriate.

Non-Retaliation / Reprisals

Procom will not tolerate any form of professional or interpersonal reprisal or retaliation against someone who reports or participates in an investigation regarding suspected violations of this Policy.

COMPLIANCE

Procom Employees receive training on our Human Rights Policy as part of their annual Code of Conduct training. Employees found to be in breach of this Policy may be subject to remedial training and/or disciplinary action.

Policy Review

This Policy will be reviewed annually and as required in accordance with the *Policy and Procedure Framework*.

RELATED DOCUMENTS

Accessibility Policy

Code of Conduct

Health and Safety Policy

Privacy Policy

Respectful Workplace Policy

Sustainability Policy

