

BUCKMAN HUMAN RIGHTS POLICY

July 2024

Introduction

Buckman is committed to promoting and respecting human rights as outlined in the Universal Declaration of Human Rights (UDHR), the International Labour Organization (ILO) Conventions, and the United Nations Guiding Principles on Business and Human Rights and Convention on the Rights of the Child. This policy outlines our commitment to human rights and the standards we adhere to in all our operations and business relationships.

The protection of human rights and fundamental freedoms is a top priority at Buckman. The elimination of child labor and forced labor is a central challenge for the international community. Buckman unequivocally condemns and prohibits the use of child or forced labor. As an organization, we are committed to doing business in a legal, ethical manner and to adding value to society instead of doing harm. We ensure that our organization does not take part in the exploitation of children and helps end such exploitation to the best of our ability.

While our goal is to grow and thrive as a business and create opportunities for employees, we are also committed to doing good work for the communities we work and live in. We ask all our employees and partners to follow our lead in being good citizens within our communities, not just because we demand it as an organization, but because securing a bright future for children is everyone's duty.

Scope

This policy applies to our entire global organization and creates and sets expectations for all Buckman employees, contractors, suppliers, and business partners across all regions where we operate. We will not conduct business with anyone that violates our policy.

For guidance with our policy, we look to the ILO, and the UN's Convention on the Rights of the Child. Based on these standards, Buckman is committed to:

- Follow the stricter law, which sets the highest standard, if more than one law applies (e.g., local, state, federal, and international).
- Have requirements in place (by the end of 2024) that its suppliers, partners, contractors, and vendors follow the stricter applicable laws and recognize children's rights.

Our Policy

Buckman commits to:

I. Respecting Human Dignity

At Buckman, as reflected in our code of ethics, we believe that treating all individuals with respect and dignity is fundamental to our operations and our relationship with employees, contractors, suppliers, customers, and the communities in which we operate. Our commitment to human dignity includes the following principles:

- *Non-Discrimination:* Promoting equal opportunity and creating a work environment free from discrimination based on race, color, sex, language, disability, religion, ethnicity, political opinion, national or social origin, birth, or other status protected by applicable law. We respect the rights of indigenous peoples, refugees and migrants.
- *Equality and Inclusion:* We promote equality and inclusivity by valuing diverse perspectives and ensuring that all individuals have equal access to opportunities and participation in our workplace and business operations. The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is based on a person's qualifications, performance, skills and experience.
- *Freedom of Expression:* We support and uphold the right to freedom of speech, encouraging open and honest communication while fostering an environment where diverse opinions and perspectives can be expressed without fear of retaliation or censorship. We provide ample opportunity for this, including employee surveys and hotline channel, if people prefer to provide feedback anonymously.
- *Harassment-Free Workplace:* We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance. We are committed to providing a safe and respectful environment where everyone is treated with kindness and respect.
- *Health and Safety:* We prioritize the physical and mental well-being of our employees by maintaining a safe and healthy work environment, with a safe working condition that complies with applicable safety and health laws and regulations, as well as internal requirements. We implement robust health and safety standards and practices to prevent accidents and injuries. We ensure all employees have access to water, sanitation and breaks during work hours.
- *Work Hours, Wages and Benefits:* We compensate employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

II. The Prohibition of Child Labor

In keeping with internationally recognized standards, Buckman makes a distinction between child labor and young workers. Buckman will not tolerate child labor under any circumstances. The employment of young workers (i.e., minors who have reached the minimum age of employment and completed compulsory schooling) is allowed under strict conditions and in compliance with the ILO standards. The distinction between child labor and young workers is often based upon socioeconomic factors. In countries in which the educational system and the economy are not sufficiently developed, the existence of families can be jeopardized if minor children who have reached the minimum age of employment are not allowed to work. Buckman therefore considers it preferable to forego any general ban on the employment of young workers and instead to respect domestic law and international standards. Buckman does not, however, actively promote the employment of young workers for normal work and such cases are the exception.

Buckman will only employ children who meet the respective jurisdiction's qualifications for education and age to allow minors the opportunity to work.

When it comes to employing young workers (children who are at least 15 but less than 18 per ILO standards), Buckman will always follow the strictest of applicable laws. As a general rule, young workers can have a job, but they should never do work that jeopardizes their health and safety or affects their schooling and development. For example, they will never operate heavy machinery or vehicles, use sharp implements, or work with hazardous materials. We will determine their work hours and wages based on applicable laws. We will not employ young workers for more than the maximum weekly or daily hours allowed by applicable law.

III. The Prohibition of Forced Labor

In accordance with ILO Convention No. 29, forced labor is defined as any work or service performed involuntarily under threat of penalty. Buckman will not tolerate or condone any form of forced labor, modern slavery, or human trafficking for any reason. Buckman does not retain employee's original identification documents. Buckman does not accept use of force to limit freedom of movement of our employees.

IV. Freedom of Association and Collective Bargaining

We respect our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

V. Empowerment and Development

Employee Development: We believe in empowering our employees by providing opportunities for professional and personal growth. We offer training and development programs to enhance skills, knowledge, and career progression. We also provide an internal job posting site where we advertise several job openings. Employees are encouraged to apply for other Buckman positions for which they qualify that fit their career aspirations.

Employee Voice: We encourage open communication and actively seek input from employees. We provide channels for employees to voice their opinions, suggestions, and concerns without fear of retaliation.

Implementation and Accountability

To ensure the effective implementation of this policy, Buckman is committed to:

- **Training and Awareness:** Provide regular training and awareness programs on human rights for employees, including educating our staff on youth work laws, and show them how to report child or forced labor if they see or suspect it.
- **Expectation Setting:** Requiring hiring managers and HR not to hire minors under the legal age for working. We also expect them to know and follow this policy and laws on wages and hours for older children.
- **Governance:** Keeping and validating documentation verifying our employees' age after they are hired. If we discover that we have hired a minor under the age of 18, Buckman will review applicable laws and adjust working hours accordingly. If we need to terminate employment, we will assess the situation on a case-by-case basis and offer assistance when necessary.
- **Addressing Issues and Concerns:** Buckman commits to investigating and addressing any concerns related to human rights across our global operations. Buckman does not tolerate discrimination, harassment, child or forced labor, and any other practice that conflicts with this policy. Where we identify adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in, their fair and equitable remediation.
- If we discover that our suppliers, customers or other partners employ children or forced labor, we will cease doing business with them.
- Demanding and confirming an elimination plan has been implemented in cases where suppliers discover child labor in their business.
- Consulting with experts on topics like child labor, health and safety standards or corporate social responsibility.

Reporting and Issue Identification

We strive to create workplaces in which open and honest communications among all employees are valued and respected.

Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with local management, Human Resources, or the Legal Department. Employees can also report suspected policy violations through our Ethics Point channel listed below.

No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

(Ethics Point - https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=12956)

Compliance with Laws

Buckman will comply with all applicable local, national, and international laws and regulations related to human rights wherever we operate.

Approval and Assistance

This Human Rights Policy has been approved by Buckman's executive team.

For general questions and more importantly to report a violation of this policy, you should immediately contact one of the following via email:

Eliana Kawakami
Chief Human Resource Officer

And

Jonathan Scharff
General Counsel