



## Human Rights Policy

Document No.: HCS-CORP-HR-POL-039

Page No.: 1 of 3

Version No.: 1

Issue Date: February 1, 2022

Issued By: Human Resources

Authorised By: Board of Directors

### 1. INTRODUCTION/PURPOSE

At Hoover Circular Solutions, we are committed to upholding labor and human rights in our relationships with employees, customers, suppliers, partners and in the communities in which we operate. Our approach to labor and human rights is informed by international laws, conventions and frameworks including the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

### 2. SCOPE

This policy applies to all prospective and current employees of the company as well as volunteers, contractors and consultants. Suppliers are expected to abide by these same values, which are covered separately in our Supplier Code of Conduct.

### 3. REFERENCES

- Hoover Circular Solutions Code of Conduct
- Hoover Circular Solutions Employee Handbook

### 4. RESPONSIBILITIES

Responsibility for implementing the policy is held by the Hoover Circular Solutions leadership team, the senior executive team responsible for ensuring environmental, social and governance (ESG) issues are integrated into all business decision-making functions.

### 5. APPROACH

At Hoover CS we promote the well-being of our employees, our customers, and our customers' customers by contributing to programs and initiatives that contribute to the quality of life in the communities in which we work, service and live. We respect the rights of all people and hold not only ourselves but our suppliers and vendors and stakeholders to the same high standard Social Responsibility.

### 6. DIVERSITY & INCLUSION

Hoover CS is an equal opportunities employer. We are committed to developing a diverse and inclusive workforce and providing a work environment in which everyone is treated fairly and with respect, irrespective of gender, ethnicity, nationality, class, color, age, sexual identity, disability, religion, marital status or political opinion. Employment and advancement within Hoover CS must be based on professional capabilities and qualifications.

### 7. DISCRIMINATION & HARASSMENT

Discrimination, either overt or through unconscious bias, has no place at Hoover Circular Solutions. We do not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind. Harassment is not tolerated in the workplace or in any work-related circumstance outside the workplace.



## Human Rights Policy

Document No.: HCS-CORP-HR-POL-039

Page No.: 2 of 3

Version No.: 1

Issue Date: February 1, 2022

Issued By: Human Resources

Authorised By: Board of Directors

### 8. WORK HOURS, WAGES & 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.

### 9. PROFESSIONAL GROW & DEVELOPMENT

We are committed to creating an environment where everyone is encouraged to give their best and realize their full potential, through the provision of learning and development opportunities.

### 10. EMPLOYEE PRIVACY

We respect our employees' privacy and comply with all applicable laws regulating the disclosure of personal information, including data protection laws. We are transparent in our use of data, and protect the rights of our employees, contractors, customers, and business partners.

### 11. SAFE & HEALTHY WORKPLACE

It is Hoover CS policy to provide and maintain a healthy and safe working environment and to prevent injury, illness, or impairment to the health of employees, contractors, customers or the public. We rate safety a priority over all other aspects of our business activities.

Our GOALZERO safety culture is based on the fundamental belief that all incidents are preventable, meaning no injuries, no environmental damages or releases and no detrimental impacts on human rights.

### 12. WORKPLACE SECURITY

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity.

### 13. FORCED LABOR, HUMAN TRAFFICKING, AND CHILD LABOR

Hoover CS opposes the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking. We strictly follow local and national laws restricting the employment of underage workers. Regardless of local laws, Hoover CS does not hire workers under the age of 18, except in limited cases such as for work-study or supervised internships. We encourage the development of potential future employees using internships or student worker programs. However, these programs should be designed for the benefit and include training of the students. Participants in such programs may not perform work that is likely to endanger their health or safety, and all participants are fairly compensated for their work based on local laws.

### 14. FREEDOM OF ASSOCIATION

We respect the individual's right to freedom of association. We relate to our employees through both collective and individual agreements, according to local law, custom and practice.



## Human Rights Policy

Document No.: HCS-CORP-HR-POL-039

Page No.: 3 of 3

Version No.: 1

Issue Date: February 1, 2022

Issued By: Human Resources

Authorised By: Board of Directors

## 15. SPEAKING UP

We hope all employees will feel able to raise concerns about actual or possible Wrongdoing openly and, where they feel comfortable, directly with their line manager. Generally speaking, your line manager will be in a position to resolve a concern of Wrongdoing quickly. However, your line manager is not your only option. Other channels include:

- a) Toll-Free Telephone (Please see detailed dialling instructions at the end of this section.)
- b) Website: [www.lighthouse-services.com/hooversolutions](http://www.lighthouse-services.com/hooversolutions)
- c) E-mail: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)
- d) Fax: (215) 689-3885 (must include company name with report)

AT&T ACCESS INFORMATION FOR INTERNATIONAL DIALING Updated: 15Mar2016				
Country	Access Number	Special Dialing Guidelines	Country Codes	Most Frequently Used City Codes (For additional city code information, please contact the local provider for the country you are calling)
Canada	1-800-225-5288		1	Calgary 403; Montreal 514, 438; Toronto 647, 416, 614, 365; Ontario (Ottawa) 613; Vancouver 236, 778 and 604
Netherlands	0800-022-9111	Public phones require coin or card deposit	31	The Hague 70; Haarlem 23; Amsterdam 20
Singapore (SingTel)	800-011-1111		65	East 629
Singapore (StarHub)	800-001-0001		65	East 629
United Kingdom (British Telecom)	0-800-89-0011	May not be available from every phone & public phone Available from cellular phones	44	Birmingham 121; Manchester 161; London 20; Glasgow 141; Leeds 113
United Kingdom (C&W)	0-500-89-0011	May not be available from every phone & public phone Available from cellular phones	44	Birmingham 121; Manchester 161; London 20; Glasgow 141; Leeds 113
United States	1-800-225-5288		1	Houston 832, 713, 281; Los Angeles 213, 310, 323; New York (Manhattan) 212, 646, 917; Chicago 312, 773, 872; Washington DC 202
United States (Spanish)	1 800 222 7007		1	Houston 832, 713, 281; Los Angeles 213, 310, 323; New York (Manhattan) 212, 646, 917; Chicago 312, 773, 872; Washington DC 202

## 16. MONITORING AND REVIEW

Oversight of this policy is provided by the Hoover Circular Solutions leadership team.