

Human Resources Department

Dissemination and Access

This Policy is published on shi.com and reflects SHI's current commitments to the protection of labor and human rights. For the most up-to-date version, please refer to shi.com.

This Policy is intended to provide guidance on SHI's approach to labor and human rights. It does not form part of any employment contract.

Introduction

The purpose of this Labor and Human Rights Policy ("Policy") is to affirm SHI International Corp.'s ("SHI" or "the Company") commitment to upholding the labor and human rights of all individuals within its organization. This Policy establishes the standards of conduct expected throughout SHI as it commits to supporting the well-being of all workers. It outlines SHI's objectives, commitments, management practices, and engagement mechanisms related to labor and human rights.

Scope

This Policy applies globally to all SHI employees, consultants, contractors, agents, affiliates, and any other persons acting for or on behalf of the Company.

This Policy provides overarching guidance for SHI's global operations and is to be implemented in conjunction with entity-specific policies and procedures, ensuring compliance with all applicable local laws and regulations. In the event of a conflict between this Policy and other entity-specific policies or handbooks, the policy most relevant to the legal entity shall take precedence to ensure adherence to local requirements and practices.

Objectives

- Maintain a zero-tolerance policy regarding harassment and discrimination, with the objective of resolving all reported incidents promptly and efficiently.
- Provide mandatory training on anti-harassment and discrimination to all new employees and conduct annual training for all existing employees.
- Monitor employee engagement related to labor and human rights.
- Design job postings and recruitment processes to attract a diverse pool of candidates.

Policy Governance and Stakeholder Responsibilities

SHI is committed to safeguarding employee rights and dignity by complying with all applicable government regulations across its global operations. Regular reviews ensure this Policy remains current with legal standards and that established processes are in place to identify, investigate, and resolve any labor or human rights violations.

Additionally, SHI collaborates with organizations and local authorities to foster an environment that respects and protects human rights, ensuring all practices reflect the Company's commitment to ethical standards and corporate responsibility.

SHI Labor & Human Rights Policy

Executive Leadership: Sets the ethical tone and exemplifies fairness and respect. Conducts quarterly staff meetings via webinars, memos, or newsletters to provide updates on progress toward company goals and organizational values.

Human Resources (HR) Department: Implements, monitors, and updates HR-related policies to address concerns and maintain compliance. Maintains comprehensive records of all labor grievances and regularly reviews them to prevent reoccurrence. Provides support to employees and ensures HR practices align with Policy objectives.

Global ESG Team: Monitors Environmental, Social, and Governance (ESG) data at the group level and provides regular updates through internal and external reporting, including annual sustainability reports. Conducts supplier due diligence and double materiality assessments, implements risk-mitigation tools, and supports regulatory compliance. Assists sales account managers by providing resources and guidance on ESG-related inquiries from customers and stakeholders.

Managers: Set high standards of conduct and lead by example. Ensure team members understand and adhere to policies. Actively promote SHI's goals and objectives.

Employees: Responsible for understanding and adhering to this Policy. Expected to treat colleagues with respect, report concerns, and embody SHI's values.

SHI Code of Conduct

SHI's Code of Conduct and Ethics Policy ("Code") establishes the minimum standards of ethical behavior and responsible business conduct that all employees must follow. The Code is designed to:

- Encourage honest and ethical conduct, including the proper management of actual or potential conflicts of interest between personal and professional relationships.
- Ensure compliance with all applicable laws, rules, and regulations.
- Facilitate prompt internal reporting of violations to the appropriate personnel.
- Promote accountability for compliance with the Code.
- Prevent misconduct.

Modern Slavery

SHI is committed to respecting human rights and advancing the dignity of all people. SHI explicitly prohibits human trafficking, child labor, the use of involuntary labor, and all forms of modern slavery in its operations.

Child Labor

SHI maintains a zero-tolerance policy toward all forms of child labor and strictly complies with local minimum working age laws and requirements. The Company conducts thorough eligibility audits during the hiring process to ensure compliance with applicable age requirements.

Freedom of Thought, Belief, and Religion

SHI supports the freedom of thought, belief, and religion, including the right to change one's religion or beliefs at any time. All employees are entitled to express their beliefs, including wearing religious attire, discussing their beliefs, and participating in religious practices.

Social Dialogue

SHI recognizes the rights of employees to form or join trade unions and similar organizations, consistent with International Labour Organization (ILO) conventions on freedom of association. The Company protects these rights from interference by any SHI representative, as established by applicable laws. Employees are free to participate in collective bargaining agreements, trade unions, and employee-led resource groups without fear of retaliation.

A positive environment of mutual understanding and trust is essential for productivity and employee satisfaction. SHI fosters direct and regular communication in the workplace, considering the unique circumstances of each country and complying with local legislation requirements. SHI conducts annual employee engagement surveys, monitors participation rates, and evaluates feedback to identify opportunities for improvement. Action plans are developed and implemented based on survey results to address labor-related concerns.

Employment

Employees receive a job description upon joining the Company, detailing the responsibilities and expectations of their role. SHI provides compensation that exceeds statutory minimum wage requirements. The Company conducts regular pay reviews to ensure compensation remains fair, competitive, and consistent with industry standards.

Working Conditions

SHI upholds international standards for working conditions and ensures compliance with all relevant country regulations. Employees are not subjected to excessive working hours. The Company maintains a workplace free from violence, intimidation, harassment, and any unsafe or disruptive conditions resulting from internal or external threats. SHI prioritizes employee well-being by supporting a healthy work-life balance.

Protection from Discrimination

SHI is an equal opportunity employer. It is the policy of the Company to prohibit discrimination of any type and to afford equal employment opportunities to employees and applicants, without regard to race, color, religion, sex, national origin, age, gender identity or expression, sexual preference/orientation, genetic information and testing, pregnancy, family and medical leave, disability, or veteran status. The Company's policy is to employ, retain, promote, and otherwise treat all employees and job applicants based on merit, qualifications, and competence.

It is prohibited for any employee of the Company to refuse to recruit, hire, train, promote, or provide equitable employment conditions to any employee or applicant, or to discipline or dismiss an employee solely on the basis of such person's race, color, religion, sex, national origin, age, gender identity or expression, sexual preference/orientation, genetic information and testing, pregnancy, family and medical leave, veteran status or disability unless the disability precludes the employee from carrying out the essential functions of the job even with a reasonable accommodation.

Bullying and Harassment

SHI is committed to maintaining a workplace free from bullying, harassment, victimization, and unlawful discrimination, ensuring dignity and respect for all employees while valuing individual differences and contributions. SHI conducts annual anti-harassment and discrimination training programs for all employees.

SHI Labor & Human Rights Policy

Training

Training is essential to promote understanding and compliance with labor and human rights practices across the Company. SHI provides annual training on ethical decision making, human rights, anti-discrimination, diversity, equity, and inclusion as part of the Code of Conduct training to ensure all employees are aware of required standards.

Health and Safety

SHI is committed to meeting all required health and safety standards and ensuring the protection of all employees by complying with all applicable laws, regulations, practices, and procedures. SHI takes proactive measures to prevent work-related incidents. The Company's integration centers maintain comprehensive health and safety management systems that include identifying potential hazards, assessing risks, and implementing effective control measures.

Unsafe practices or conditions must be reported immediately so that appropriate action can be taken to minimize hazards. The Company thoroughly investigates all incidents, and implements corrective measures in accordance with the SHI Health, Safety, and Environment Policy.

Whistleblower Policy

SHI provides confidential reporting channels that enable employees, partners, customers, and other stakeholders to raise concerns about ethics, legal compliance, and misconduct.

Stakeholders are expected and encouraged to report in good faith any conduct that violates SHI's policies, values, or applicable laws. Misconduct may include, but is not limited to, fraud, bribery or corruption, legal violations, unethical behavior, or other improper business practices.

Reports may be submitted via the following channels:

Confidential Email: ethics@shi.com

Anonymous Whistleblower Hotline: U.S. +1 (732) 377-2300 | U.K. +44 (0) 1908 75 3306

All reports are reviewed by appropriate internal functions, including Compliance, Legal, or Human Resources, and are addressed in a fair and consistent manner. Where appropriate, investigations are conducted and corrective actions are taken.

SHI International Corp has a strict Anti-Retaliation Policy and will not tolerate retaliation against any employee who brings a good faith report of misconduct or participates in any investigation.

Partners are expected to maintain appropriate processes within their own operations to enable the reporting and escalation of concerns and are required to cooperate with SHI in the investigation of any reported issues.

Policy Review and Updates

This Policy is global in scope and is reviewed and updated annually to ensure continued effectiveness and alignment with business needs and values.

Version	Effective Date	Changes Made	Author/Owner
2.0	12/01/2025	07/13/2026	Stacey Terranova Manager, Global HR & Compliance