

HALO Branded Solutions, Inc. Human Rights Policy Statement

HALO Branded Solutions (HALO) recognizes our responsibility to respect human rights and believes that a commitment to promoting human rights is key to corporate social responsibility and brings value to our company and clients.

This policy statement applies to HALO and the provisions outlined are subject to, and subordinate to, our Employee Handbook and Code of Conduct. It also applies, as far as reasonably achievable, to all partners, suppliers, and third-party subcontractors in our supply chain with the provisions outlined included in our Vendor Agreements and Supplier Code of Conduct.

We seek to establish relationships with entities that share the same principles and values as HALO. We expect that any entity we work with will respect human rights and will take the appropriate action if issues arise. If any HALO stakeholder believes someone is violating this policy statement, they are asked to report it immediately to HALO human resources, General Counsel, or through the whistleblowing channels outlined in our Employee Handbook, Code of Conduct, or Supplier Code of Conduct.

HALO will require suppliers to commit to ethical conduct. HALO suppliers, partners, and their third-party subcontractors must adhere to these provisions and safeguard worker rights under applicable labor, social security laws and regulations in the places in which they do business.

- **Child and Forced Labor** – Child and forced labor is not tolerated in any form. HALO has a Zero Tolerance Policy for the use of child or forced labor or human trafficking practices.
- **Health & Safety** – HALO strives to provide employees, contractors, and visitors with a safe and healthy working environment. At a minimum, HALO will evaluate applicable local, State and Federal worker safety laws and design programs to comply with those laws. We will take appropriate action to assess workplace hazards and mitigate hazards in an effort to prevent work related accidents or illnesses. HALO will also establish grassroots safety committees as warranted to provide employees an opportunity to speak up and provide input regarding workplace safety conditions.
- **Non-discrimination** – HALO is committed to providing equal employment opportunities to all employees and applicants without regard to race, religion, color, sex (including childbirth, breast feeding, and related medical conditions), national origin, citizenship status, uniform service member status, pregnancy, age, disability, sexual orientation, gender identity, genetic information, or any other protected status in accordance with all applicable federal, state, and local

laws. All employees shall be treated strictly according to their abilities and qualifications in any employment decisions, including but not limited to hiring, advancement, compensation, benefits, training, layoffs, and termination.

- **Harassment and Abuse** – No employee shall be subject to corporal punishment or to physical, sexual, psychological, or verbal harassment or abuse. Earned wages shall not be deducted as a fine or penalty under any disciplinary practice unless recognized under laws or existing policy.
- **Diversity Equity and Inclusion** – We celebrate the diversity of our employees, stakeholders, and clients. The diverse backgrounds and experiences of the people with whom we work are important aspects of who we are and who we strive to be. We believe that inclusion requires action and expect every individual to contribute to building respect, dignity, and equity in everything we do.
- **Working Hours** – HALO follows all state and federal laws as it pertains to break and meal periods for its employees. Unless national regulations require lesser maximum hours of work, and except under extraordinary business circumstances, employees shall not, on a regularly scheduled basis, be required to work a standard work week of more than 48 hours per week or a total work week of more than 60 hours (including overtime). Except in extraordinary business circumstances, all workers shall be entitled to at least one day off in every seven-day period.
- **Compensation** – Wages, including overtime and benefits, shall equal or exceed the level required by applicable law.
- **Freedom of Association & Right to Collective Bargaining** – All employees are free to exercise their legal rights to form, join, or refrain from joining organizations representing their interests as employees.
- **Environmental Compliance** – Environmental issues are a core concern for HALO, and we apply a holistic approach to minimize the environmental impact from production, product use, and disposal. We shall take appropriate actions to address all relevant environmental aspects and impacts, including emissions, waste, and resource consumption. A management system shall be in place, aimed at continuously improving the units' environmental standards and performance.
- **Monitoring and Compliance** – Management is responsible for implementing and informing employees of their rights, duties, and responsibilities. Management is also responsible for maintaining adequate documentation to demonstrate its and its suppliers' compliance. As a condition of doing business with the HALO, suppliers must authorize HALO and its designated agents (including third parties) to perform audits, including confidential employee interviews.