



Global Human Rights Policy

1.0 SCOPE

This Policy applies worldwide to all directors and employees of Mattr Corp. (together with its subsidiaries and affiliates, “**Mattr**”), as well as agents, consultants, temporary employees or secondees and other company representatives acting on behalf of the company with either real or apparent authority, and regardless of location, nationality, or domicile (collectively “**Mattr Personnel**”).

2.0 INTRODUCTION

Mattr is committed to maintaining a corporate culture that respects the principles aimed at promoting, protecting, and supporting all internationally recognized human rights. We recognize our responsibility to respect Human Rights and avoid complicity in human trafficking, child labor, forced labor or other human rights abuses. “Human Trafficking,” “Worker Exploitation,” “Forced Labor” and “Child Labor” (collectively referred to herein as “Human Rights Abuses”) are terms used to describe situations where one person is exploited by another person for profit. These are broad terms that cover many types of exploitation that use force, fraud, coercion, deception, discrimination, or abuse of power.

The purpose of this Policy is to ensure that (1) all individuals working for Mattr are safe and not exposed to any threat or acts of Human Rights Abuses, and that (2) Mattr does not work with other organizations, vendors or suppliers who may be engaged in Human Rights Abuses.

3.0 POLICY STATEMENT

Mattr has a zero-tolerance policy when it comes to all forms of Human Rights Abuses and remains committed to acting ethically in all our business dealings and relationships. We also require that all third parties doing work for Mattr follow the principles of this Policy, either by having a policy that encompasses these principles or by adopting this Policy, including a commitment to ensure that Human Rights Abuses are not occurring in any part of the business or supply chain.

4.0 OVERVIEW

4.1 What is /Human Trafficking/Worker Exploitation/Forced and Child Labor?

At its broadest, the term “Human Rights Abuses” incorporates situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception. It includes slavery, servitude, forced labor, debt bondage, and deceptive recruiting for labor or services.



Human Rights Abuses involve three elements: 1) the perpetrator's actions to obtain or maintain labor; and 2) using force, fraud, or coercion over the victim; and 3) for purpose of taking advantage of the victim.

The use of force, fraud, or coercion over a victim may include preventing a victim from controlling their own freedom, safety, personal documents, working and living conditions, and wages. If a worker does not have control over any of these areas, it is a potential sign of trafficking or exploitation.

Examples of forced labor can include situations where a worker: (i) is paid less than promised; (ii) experiences an employment situation which does not comply with applicable laws; (iii) does not receive pay; and/or (iv) does not have access to their identification documents or has no control over their money.

Mattr, and the third parties who work with Mattr, shall not use "child labor". Specifically, Mattr, and the third parties who work with Mattr, shall not employ any workers who are under the minimum legal working age in the country of employment. Employment of workers under the age of 18 should not interfere with their compulsory education. Mattr Suppliers shall not hire individuals under the age of 18 for positions where hazardous work is carried out, as determined by the nature of the work or the circumstances under which the work is carried out.

4.2 What are Prohibited Behaviors?

In addition to prohibiting Human Rights Abuses as defined above, Mattr also prohibits actions that directly support or advance Human Rights Abuses. Such actions include, but are not limited to:

- Destroying or otherwise denying access to an employee's identity or immigration documents.
- Using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment.
- Charging employees recruitment fees.
- Using recruiters who do not comply with local labor laws.
- Employing underage individuals.
- Providing wages and benefits that do not meet local legally required minimum standards.
- Providing housing that does not comply with applicable laws regarding health and safety, sanitation, fire safety, risk protection and electrical, mechanical and structural safety.



- Failing to provide an employment contract or work document where required by applicable laws.

4.3 Red Flags of Forced Labor

The following is a non-exclusive list of "red flags" of forced labor:

- Abuse of vulnerability, such as workers who don't speak the local language or understand local laws and regulations.
- A worker feels pressured by their employer to stay in a job or situation they want to leave.
- A worker owes money to an employer or recruiter and/or are not being paid what they were promised or are owed.
- A worker does not have control of their passport or other identity documents.
- Workers are living and working in isolated conditions, largely cut off from interaction with others or support systems.
- A worker appears to be intrusively monitored by another person when talking or interacting with others.
- Workers are living in dangerous, overcrowded, or inhumane conditions provided by an employer.
- A worker is being threatened by their boss with deportation or other harm.
- Workers are working in dangerous conditions, without proper safety gear, training, adequate breaks, and other protections.

5.0 RESPONSIBILITIES

- Chief Compliance Officer is responsible for periodically reviewing this Policy, related policies (including the Mattr Code of Conduct), and ensuring it sufficiently accomplishes its stated purpose.
- Business Unit Presidents are responsible for identifying, mitigating, and monitoring Human Rights Abuses in their operations. This includes, but is not limited to, conducting due diligence as required by Mattr, and certification requirements on third party suppliers and vendors to ensure that Mattr is not using organizations, vendors, suppliers or other third parties involved in Human Rights Abuses. If any organizations, vendors, suppliers or other third parties seem like a high-risk third party, the Business Unit President should work with the Chief Compliance Officer to determine any additional compliance measures that should be implemented.
- All Employees and Contractors: The most important thing you can do is speak up. If you see or hear something that seems suspicious or doesn't quite "feel" right to you, it probably isn't. Additionally, you are required to timely report to the Compliance Department any conduct that is inconsistent with the law or this Policy.



6.0 WHERE TO GO FOR HELP

Any Mattr Personnel who observes conduct that may violate this Policy should be immediately reported to Mattr. The report can be made directly to the Chief Compliance Officer, Nicolas Viellard, by phone at +31 6 23 90 3895 or by email at nicolas.viellard@mattr.com or through the Company Whistleblower Hotline:

- Website: <https://www.lighthouse-services.com/StandardCustomURL/LHILandingPage.asp>
- Telephone for English speaking USA and Canada: (833) 210-4024 (not available from Mexico)
- Telephone for French speaking Canada: (855) 725-0002
- Telephone for Spanish speaking North America: (800) 216-1288 (from Mexico, dial 01-800-681-5340)
- Telephone for Persons outside of North America: (800) 603-2869 (must dial country access code first. [click here](#) for access codes and dialing instructions)
- E-mail: reports@lighthouse-services.com (must include company name with report)

7.0 NO RETALIATION

Mattr strictly prohibits reprisal, retaliation, or subsequent discrimination against any Mattr Personnel who in good faith report any concern or violation of this Policy or who cooperate with any investigation of such reports. Any employee who engages in any retaliation or other violation may be subject to disciplinary measures, up to and including termination of employment.

8.0 DISCIPLINARY ACTION

Any violation of applicable law or Mattr policy, (including this Policy), by Mattr Personnel may be grounds for disciplinary action, up to and including termination of employment.

Policy Date: January 10, 2024