

Construction Specialties

Human Rights Policy

PURPOSE

To establish and reaffirm Construction Specialties, Inc.'s (CS) position and commitment to respecting the Human Rights of all people throughout our business operations. This policy is informed by the United Nations Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work to the extent applicable to CS business operations.

SCOPE

This policy will apply to all employees of Construction Specialties (CS) across all jurisdictions in which the company operates. It also extends to CS' supply chain partners, local communities, potentially affected groups, and other relevant stakeholders. The policy establishes clear expectations regarding the respect for and promotion of human rights throughout all areas of the company's operations and sphere of influence.

POLICY REFERENCES

- [United Nations Guiding Principles on Business and Human Rights](#)
- [Universal Declaration of Human Rights](#)
- [International Labor Organization's Declaration on Fundamental Principles and Rights at Work](#)

POLICY

CS respects internationally recognized Human Rights as established in the Universal Declaration of Human Rights and the International Labour Organization's Core Conventions. According to the UN, Human Rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, sexual orientation, or any other status protected by applicable law or regulation. Human Rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination. Our minimum standards for these principles are laid out in this Policy. When there is a discrepancy between national law and international human rights standards, CS will adhere to the higher standard. In cases where national law conflicts with internationally recognized human rights, the company will strive to uphold international standards to the greatest extent possible.

Employment: CS prohibits the use of all forms of forced labor, including bonded labor, indentured labor, and child labor in our operations. Employees should not be charged fees in exchange for employment or have collateral in the form of money, identification or other personal belongings held – without the employee's voluntary consent – as a condition of employment. The use of physical punishment, threats of violence or other forms of abuse will not be tolerated.

Child Labor: CS prohibits child labor, defined as work that is hazardous to children's health, safety or morals, work that interferes with compulsory education or for which they are simply too young. There shall be no employment of anyone under the age of 15 for any position or under the minimum age for employment in their local jurisdiction, whichever is greatest. Workers under the age of 18 should not perform hazardous work and should not work night shifts or overtime. All workers in our operations must meet the minimum age to work as defined by applicable local laws and regulations. Suppliers shall not use forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise. Suppliers must allow employees to keep their own identification documents and to resign from their positions at any time.

Harassment and Discrimination: CS prohibits discrimination in our operations on the basis of age, color, national origin, citizenship status, physical or mental disability, race, religion, creed, gender, sex, sexual orientation, gender identity and/or expression, genetic information, marital status, status with regard to public assistance, veteran status, or any other characteristic protected by applicable federal, state or local law or regulation. We prohibit harassment, bullying, and abuse. These prohibitions extend to migrant workers.

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Diversity and Inclusion: We strive to ensure that our workplace is one of inclusion and acceptance. The diversity of our individual backgrounds, experiences and ways of thinking is an important driver in CS' success. We must therefore value the diversity of every member of our team.

Safe and Healthy Working Conditions: The safety and health of our employees is a top priority. We are committed to providing a safe and healthy work environment in full compliance with all applicable health and safety laws and regulations. Employees should refer to their site-specific guidance where available. This includes:

- Ensuring access to clean water, sanitation, and hygiene facilities
- Implementing emergency preparation and response plans
- Establishing procedures for the safe handling of hazardous materials
- Maintaining management systems to identify and mitigate health and safety risks
- Ensuring proper building construction, electrical safety, and fire protection measures

We will maintain systems and procedures designed to keep workers safe and protect them from occupational hazards, harassment, and abuse.

Working Hours, Wages and Benefits: CS compensates employees competitively relative to our industry and local labor markets. Employees have a right to earn a living wage that covers the necessities for life as defined in their local context. All employees in our operations will be compensated in accordance with all applicable local laws and regulations including those related to minimum wage and overtime pay. Employees are entitled to legally mandated benefits including employer contributions for social security benefits and services. Working hours must be in line with legal requirements and any collective bargaining agreements applicable to the location in order to prevent excessive working hours.

Freedom of Association and Collective Bargaining: We respect our employees' right to join, form or not to join all types of associations, including political, religious, recreational associations or trade unions without fear of reprisal, discrimination, intimidation or harassment. Where employees are represented by a legally recognized collective bargaining agent, we are committed to bargaining in good faith with their freely chosen representatives in accordance with applicable laws.

OPEN AND HONEST COMMUNICATION

CS strives to create and maintain a workplace in which open and honest communications among all employees is valued and respected. Employees should feel comfortable speaking openly and sharing opinions with any member of leadership. CS is committed to creating an environment where employees feel comfortable raising any questions or concerns. We all benefit, and mistakes and wrongdoing can be prevented, when employees exercise their ability to ask the right questions at the right times.

CS will investigate all reported instances of questionable or unethical behavior. In instances where improper behavior is found to have occurred, CS will take appropriate action. Additionally, we will not tolerate retaliation against employees who raise concerns in good faith. Employees wishing to report concerns are encouraged to first speak with their manager or functional Senior Leadership Team (SLT) executive. If for any reason that is not possible or the employee is not comfortable raising the issue with their manager, they can speak with a member of the Human Resources team, including the VP, People & Culture. Employees can also anonymously report concerns via AllVoices, our 3rd party reporting service at: <https://csgroup.allvoices.co/>

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ANTI-CORRUPTION

CS prohibits all forms of corruption, bribery, extortion, and embezzlement. We commit to conducting business fairly, transparently, and in compliance with all applicable anti-corruption and anti-bribery laws.

COMPLIANCE WITH POLICIES

Violations of this policy will be handled in a manner consistent with CS' corrective action processes and may result in disciplinary action up to and including termination of employment.

Applicable to employees in the United States: subject to applicable law and/or regulation, this policy does not constitute a contract of employment and may be modified or terminated at any time for any reason, with or without notice, at the sole discretion of Construction Specialties (CS). Nothing contained within this policy is intended to alter your "at-will" employment relationship or create a contract of any kind (express or implied). Violations of this or any other CS policy may result in corrective action up to and including termination of employment.