

HUMAN RIGHTS POLICY

1. **Introduction**

At Sammons Warehouse Solutions (SWS), we respect the human rights of all persons who come in contact with our solutions, our people, our stakeholders, and our contractors. In concert with governmental provisions in this area, we understand and accept our responsibility to respect and protect human rights. This policy, far from being all-inclusive, is set forth to clearly articulate our responsibilities to ensure there is complete clarity in this matter. To make it as clear as possible, we have broken our responsibilities into the following areas. As we take human rights very seriously, any observed or perceived infraction against human rights should be reported to your manager as soon as possible.

2. **Non-Discrimination, Harassment, and Equal Opportunity**

An ethical and respectful workplace free of harassment, discrimination, and treatment of disparity or bias for all our team members, vendors and customers is a strong value at SWS. Equal employment opportunity is a matter of policy at SWS to ensure that we hire a diverse workforce.

It is company policy to ensure equal employment opportunity without discrimination or harassment and to recruit, hire, discipline, compensate, promote, and provide benefits for team members in all job groups without regard to race, creed, age, sex, gender, physical or mental disability, sexual orientation, pregnancy, medical condition, marital status, color, religion (including religious dress and grooming practices), uniformed service, veteran status, national origin, ancestry, genetic information, or any other characteristic protected under applicable local, state, or federal law. To ensure that we are all aligned regarding expectation in these areas, all employees will complete anti-Harassment training each year.

SWS strives to make all employment and employment-related decisions in a manner that will further the principles of equal employment opportunity. SWS makes all decisions and administers all policies and conditions of employment, including, but not limited to, hiring, training, promotion, discipline, compensation, benefits, and termination of employment, reimbursement, social and recreational programs without regard to any characteristic protected by company policy and any applicable local, state, or federal law.

Any form of unlawful discrimination, including harassment, is prohibited, and shall be considered a violation of SWS's policy on equal employment opportunity. Any form of retaliation against team members or applicants is strictly prohibited. Violations of this policy (including potential violations and actions that, if continued, could become violations) must be reported immediately to Human Resources and may result in disciplinary action, up to and including termination of employment.

3. **Commitment to Diversity**

SWS is committed to creating and maintaining a workplace in which all team members have the opportunity to participate and contribute to the success of the business and are valued for their skills, experience, and unique perspectives. Our long-term plan is to grow using innovation and creativity, and we will continue our commitment to diversity in everything we do.

4. ADA and ADAA – Reasonable Accommodation

SWS complies with the Americans with Disabilities Act (ADA), as amended by the ADA Amendments Act (ADAAA), and all applicable federal, state, and local fair employment practices laws. This means that whenever reasonably possible, the company will provide an accommodation to disabled applicants and to team members requesting an accommodation to enable the team member to perform the essential functions of the job, unless doing so would create an undue hardship for the company.

Team members that require an accommodation must make the request to Human Resources. The request can be made verbally or in writing. SWS encourages requests for accommodations to be made in writing and to include all relevant information, such as:

- A description of the accommodation
- The reason for the accommodation
- How the accommodation helps perform the essential functions of the job

Upon receipt of the request, Human Resources will engage in an interactive dialogue with the team Member to determine the precise limitations of the disability and to explore potential reasonable accommodations that could overcome those limitations. The company may ask you to provide information about the accommodation you need to perform the job and, for disabilities that are not obvious, to provide a document certifying the need for the accommodation.

5. Team Member Privacy

It is our goal to respect the individual privacy of team members and at the same time maintain a safe and secure workplace. When issues of safety and security arise, you may be requested to cooperate with an investigation. The investigation may include searching personal areas to safeguard the company and its team members, to include searches of personal belongings, work areas, private vehicles while on company premises, random drug screens and the like. Failure to cooperate with an investigation is grounds for termination. Providing false information during any investigation may lead to disciplinary action up to and including termination of employment.

Team members are expected to make use of company facilities only for the business purposes of the company. Accordingly, materials that appear on company hardware or networks are presumed to be for business purposes, and all such materials are subject to review by the company at any time without notice to the team members. Team members do not have any expectation of privacy with respect to any material on company property, networks, or systems. The company regularly monitors its communications systems and networks as allowed by law. Monitored activity may include voice, e-mail, and text

communications, as well as internet search and browsing history. team members who make excessive use of the communications system for personal matters are subject to discipline. Team members are expected to keep personal communication to a minimum.

6. Safe and Healthy Workplace

SWS promotes a safe work environment and has established safety standards which meet or exceed minimum requirements for all state and federal regulatory agencies. The Hub includes important contact numbers, safety inspection materials, and safety program materials for all company locations.

SWS's Leadership is responsible for ensuring company health and safety policies and procedures are clearly communicated and understood by all team members. Leaders are expected to monitor and enforce the safety policies and procedures fairly and uniformly.

The company recognizes that responsibilities for health and safety are shared among all Team members. Each team member is responsible for practicing safe workplace behaviors and for maintaining a safe and clean work environment. Team members are expected to follow all health and safety rules, directives, policies, and procedures.

Team members who deliberately fail to follow safe work practices and procedures, or who violate company safety rules or directives will be subject to disciplinary action, up to and including termination.

7. Workplace Security

To provide a secure workplace, all team members shall comply with the following:

- No weapons are allowed in any Sammons workplace.
- Any act of physical violence shall result in immediate termination of employment.
- Any threats of violence, be they delivered verbally or by electronic or other medium, shall result in immediate termination of employment.
- If working in a location with access badging or other security measures, rules associated with their use shall be strictly followed.

8. Forced Labor and Human Trafficking

Forced Labor and Human Trafficking of any kind of vigorously opposed by SWS. Because of the severity of these issues, we ask for vigilance among our team members. **IF YOU SEE SOMETHING, SAY SOMETHING.** Any violation of governing laws, regulations, or company policy in this regard shall be prosecuted to the extent of our ability. This standard applies not only to our team members, but to suppliers, contractors, stakeholders, and customers.

9. Code of Conduct

SWS is a subsidiary of Sammons Enterprises, Inc. (SEI). SEI believes that the key to its success is the values-based culture of SEI and its businesses. SEI has adopted a Sammons Business Ethics and Compliance Program (SEI Compliance Program) to ensure that it and its controlled subsidiaries and affiliates promote this values-based ownership culture.

The SEI Compliance Program includes the SEI Code of Ethics as well as the SEI Compliance Policies. Both the SEI Code of Ethics and all applicable SEI Compliance Policies are incorporated into this Handbook by reference. Team members shall comply with both the SEI Code of Ethics and applicable SEI Compliance Policies. Failure to do so may result in disciplinary action up to and including termination of employment. To ensure complete clarity on this topic, all employees shall complete Code of Conduct training each year.

As team members of a SEI company, we are expected to behave in ways that reflect our company values. That means holding ourselves and others responsible for actions that may negatively impact our business or reputation, and those actions or behaviors that create risks to our team members, customers, or the public.

Ethics and integrity are core values of both SEI and SWS. SEI has an Open-Door policy as well as an Internal Complaint policy that is intended to ensure that team members can report any concerns to their Leader, any other member of management or to SEI's Senior Vice President of Administration. If you believe someone's conduct may represent an ethical violation, you have a responsibility to voice that concern. If you don't feel comfortable discussing with your supervisor or another member of management, report the issue directly using our confidential hotline, EthicsLine. EthicsLine allows you to confidentially report known or suspected and unethical behavior via phone or website. You may choose to remain anonymous and may opt to receive follow-up / status reports.

Please note that choosing to remain anonymous may inhibit a full and complete investigation. Reports through the EthicsLine are referred to and investigated by members of the Legal Department or by Human Resources. Where appropriate, investigations may be conducted by third parties engaged by the Company. You are to cooperate fully and truthfully in any investigation, whether conducted internally or by third parties.

CONTACT THE ETHIC HOTLINE

In the US (English and Spanish): 888-227-3136

En Mexico (Spanish): 001-800-613-2737

In the UK (no country code needed): 0808-234-5921

Ireland OneConnect: 1800 903 371

Online: www.sammonsenterprises.ethicspoint.com

If you have any questions about our Code of Ethics, or about EthicsLine, you can contact SWS Human Resources.

10. Reporting, Addressing Retaliation, and Investigations

Any observed or perceived infraction to this policy may be investigated to the extent required to determine if additional coaching, corrective actions, discipline, or termination are

warranted. It is the express policy of SWS that any type of retaliation for reporting infractions will not be tolerated.

11. Leadership Commitment, A Word from Our President

At SWS, we put our team members and our customers above everything we do, by supporting and building relationships with you and encouraging you to deliver world-class service to our customers every day. We believe our greatest competitive advantage in this industry is people like you, and we strive to build and maintain an environment where every team member feels valued and respected. Simply put, people are the lifeblood of this company. You contribute to everything we do—our products, our services, and how we separate ourselves from the competition. We also strive to create a diverse, fun, and professionally challenging work environment where everyone is treated with dignity and respect. As such, I will lead the charge in protecting the Human Rights of all team members. I ask for your support doing your part by treating your teammates with dignity and respect and reporting any lapses. Thank you for your attention in this important matter.

Thank you,

Don Keel

Don Keel
President
Sammons Warehouse Solutions, Inc.