	<b>Document Title:</b>  <b>Human Rights Policy</b>	<b>Document Number:</b>	CCE_HR_005
		<b>Process Owner:</b>	Human Resources Manager
		<b>Revision Number:</b>	005
		<b>Revision Date:</b>	Aug 26, 2025


## Human Rights Policy

**Purpose** - Markdom is committed to respecting, supporting, and promoting human and labour rights in alignment with the Ontario Human Rights Code, UN Principles on Business Human Rights (UNGPs), Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (Bill S-211), Uyghur Forced Labour Prevention Act (UFLPA) and Markdom Supplier Code of Conduct. We integrate these principles across our operations and supply chains.

**Scope** - This policy applies to all employees, managers, contractors, vendors, business partners, and suppliers providing goods or services to Markdom.

### Policy Statements:

1. **Recruitment & Selection:** Markdom ensures that all hiring and promotion decisions are based solely on merit, qualifications, and ability. Discrimination based on gender, race, ethnicity, religion, disability, age, sexual orientation, or any other protected status is strictly prohibited.
2. **Fair Compensation:** Markdom maintains a fair, competitive, and transparent compensation system. Compensation is reviewed to ensure compliance with local laws, market standards, and internal equity principles.
3. **Accommodation and Accessibility:** Markdom is committed to accommodating employees’ religious, medical, or personal needs up to the point of undue hardship. Every effort will be made to create a physically and psychologically accessible workplace.
4. **Freedom of Association & Collective Bargaining:** Markdom respects workers’ rights to organize, join associations, and engage in collective bargaining
5. **Non-Discrimination and Harassment:** Markdom strictly prohibits discrimination, harassment, and retaliation. Reporting mechanisms are accessible and confidential, and employees are encouraged to report incidents promptly.
6. **Supplier Code of Conduct & Supply Chain Responsibility:** All suppliers must uphold the same standards of ethics, labour, and human rights as defined in this Policy and in the Markdom Supplier Code of Conduct, including:
  - Compliance with applicable laws and international conventions on human rights, labour, environmental protection, and anti-corruption.
  - Prohibit all forms of forced, bonded, or child labour, and ensure safe, fair, and respectful working conditions.

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- Fair treatment, safe conditions, and transparent labour practices.
- Be transparent in material sourcing and labour practices. - Implement due diligence to identify and mitigate human rights risks in their operations and supply chains.

### Human Rights Due Diligence

Markdom complies with the Uyghur Forced Labour Prevention Act (UFLPA) enacted in June 2022 and prohibits sourcing from the Xinjiang Uyghur Autonomous Region (XUAR) or any area linked to forced labour. Suppliers must provide proof of supply chain traceability.


Suppliers must demonstrate traceability to ensure that their materials and products for Markdom are free from forced labour and not sourced from restricted regions. Noncompliance will result in corrective action or termination. Noncompliance may lead to investigation and termination of the supplier relationship.

Markdom is committed to the following principles across its operations and supply chain:

- Prohibit** all forms of forced, bonded, or child labour, as well as any form of human trafficking.  
CCE\_HR\_008 – Child and Forced Labour Prevention Policy
- Comply** with local and international labour laws, including working hours, rest, and leave.
- Respect** the rights of workers across all operations and supply chains.
- Ensure** fair and non-discriminatory employment practices.
- Promote** gender equality and equal opportunities in recruitment and advancement.
- Respect** freedom of association and the right to collective bargaining.
- Provide** grievance and remediation channels accessible to all workers and partners.
- Protect** the health, safety, and welfare of all workers and other stakeholders, including local communities.

### Objectives and Targets

Objective	Target / KPI	Timeframe	Responsible
Eliminate forced and child labour in the supply chain	0 confirmed cases	Continuous	HR / Procurement
Supplier Code of Conduct adherence	100% signed acknowledgment	By 2026	HR / Procurement
UFLPA compliance	100% supplier traceability assurance	Continuous	Procurement
Prevent workplace discrimination	Zero confirmed incidents	Annual	HR / Compliance
Increase gender diversity by 15% hiring of women	HR data vs. 2024 baseline	2030	HR

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Increase employee training by 10% training hours	HR data vs. 2024 baseline	2030	HR
Pay Equity	Conduct one pay equity assessment	2026	HR / Compliance
Promote safe reporting and transparency	100% of employees, contractors and suppliers were informed of the anonymous reporting system	By 2026	HR / Compliance

### Monitoring & Reporting

- HR and Supply Chain teams will jointly perform annual human rights and supplier due diligence reviews and surveys.
- Progress and findings will be reported in Markdom’s Annual Sustainability and ESG Report.
- Corrective actions and continuous improvements will be reviewed and approved annually.

### Remedy & Grievance

Markdom provides accessible, confidential reporting channels for employees, suppliers, and third parties, including:

- ✓ HR Department
- ✓ Management
- ✓ Anonymous reporting mechanisms such as:
- ✓ [MARKDOM SPEAK UP / REPORTING FORM – Fill out form](#)
- ✓ QR code




When adverse human rights impacts are identified, Markdom will:

- Investigate promptly and fairly
- Require corrective action plans
- Support remediation for affected workers where appropriate
- Escalate serious violations to senior management
- Terminate relationships when remediation is not achieved

Retaliation against reporters is strictly prohibited.

Where adverse impacts are confirmed, Markdom will support or enable remediation in a manner consistent with internationally recognized human rights standards.

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**RECORD OF REVIEWS**

<b>Date</b>	<b>Revision Description</b>	<b>Approved By</b>	<b>Revision Level</b>
June 03, 2022	Initial Release	President – Joerg D.	001
June 14, 2022	Annual Revision	HR Manager – Johanna A.	002
April 29, 2024	Added statement, recruitment & selection, compensation structure and workplace conduct statements Document # allocated	HR Manager – Johanna A.	003
Jan 15, 2025	Added Commitment, objectives and targets	HR Manager – Johanna A. General Manger – Ravi P.	004
August 26, 2025	Review and align with UNGC commitment, Human Rights Due Diligence, clarification of Objectives and targets, Remedy & Grievance and reporting.	HR Manager – Johanna A. VP Global Operations – Billy Z.	005