Human Rights and Labor Standards Policy

1 Introduction

1.1 Purpose

PCI and its subsidiaries (collectively, “PCI”) strive to maintain a working environment, both internally and through our suppliers, that conducts its personnel practices in a manner designed to respect the human rights of all individuals and ensure equal opportunities. PCI operates in accordance with applicable laws and labor standards and PCI’s Code of Conduct. We recognize the importance of aligning our business practices with principles that not only comply with regulation but also transcend these standards to contribute positively to the well-being and further development of our workforce and communities. As a business enterprise, we take responsibility to respect all internationally recognized human rights as expressed in the Universal Declaration of Human Rights.

In this policy, we outline our objectives and set forth the measures we are undertaking to ensure the protection and promotion of responsible labor practices and human rights within our organization. It is a roadmap guiding all stakeholders—employees, suppliers, contractors, and our extended community—toward shared values and a collective commitment to ethical business practices. This policy is informed by relevant internal and external expertise; is publicly available, and communicated internally and externally to all personnel, business partners and other relevant parties; and is reflected in operational procedures necessary to embed it throughout the business enterprise.

1.2 Material and Legal Scope

This policy applies to PCI’s employees, agents, contractors, and sub-contractors in whatever capacity we employ them, regardless of the activities they conduct. This includes all our operational sites and locations where we conduct business activities. PCI will strive to ensure that its suppliers and business partners also adhere to the standards that are outlined within this policy..

1.3 Roles and Responsibilities

To ensure the effective implementation of this policy, PCI has assigned the following roles and responsibilities in the table below. These will ensure that all objectives and measures described in this policy are achieved to the best of our ability.

Role	Responsibilities
Employees	Responsible for reading the following policy, acting in accordance with this policy, and reporting any (possible) breaches immediately.
Management	Responsible for communicating applicable measures throughout the company and providing the means to support their implementation. Management is also responsible for approving the contents herein. In addition, management will select a policy owner for each policy.
Policy Owner	Responsible for the implementation and monitoring of the policy. The contact officer must review and update the policy on an annual basis and respond to all requests and inquiries. Name/Function: Mary Connery, VP of Human Resources Contact details: mconnery@pcinternational.com

2 Working Conditions

We understand that a key element of sustainable business practice is to ensure that our employees are compensated fairly, and that working conditions accommodate their needs and allow them to work as efficiently and comfortably as possible. We also understand that for such working conditions to be present and to continuously improve, soliciting employee feedback on a regular basis is an absolute requirement. PCI must foster an environment in which employees feel comfortable communicating openly with management about a variety of subjects. Lastly, employees should also refer to the Employee Handbook to see more in-depth information on this topic.

2.1 Objectives

To ensure the highest standard of working conditions, PCI has formulated the following objectives:

- Comply with all local and international legal requirements in terms of working hours, overtime, fair compensation and benefits following the FLSA guidelines
- Transparently communicate employees' rights regarding working conditions through documents such as our employee handbooks.
- Offer all eligible employees benefits relating to health, insurance, retirement savings plans, and holidays to promote psychical and mental well-being.
- Promote the use of Family and Medical Leave for all eligible employees.
- Uphold communication channels for employees to voice concerns and feedback around working conditions and seriously consider all feedback and suggestions brought forward.
- Offer all eligible employees health and wellness benefits and bonuses
- Continue to provide 100% of eligible employees paid overtime, as well as the appropriate amount of rest days as stipulated in employee contracts.
- Ensure 100% of employees have received, read and signed employee handbooks with analysis occurring in even years, next by the end of 2028
- Ensure an annual participation rate of 90% for our employee satisfaction by 2030.
- Ensure that 100% of cases per calendar year concerning working conditions raised through feedback channels are duly addressed within 3 months of discovery.

2.2 Measures

Specific measures regarding working conditions and employee engagement are outlined in detail below:

- We ensure that working hours are consistent with local regulations and common practice and are not excessive except where operational circumstances dictate otherwise.
- We are committed to compensating overtime work at the rate of two times a non-exempt employee's regular rate of pay to hourly employees for hours worked over twelve hours in a workday following all FLSA Guidelines.
- We offer medical, dental, and vision coverage to all regular full-time employees, as well as insurance premium for employees and their eligible dependents.
- We provide paid parental leave and family-friendly policies to our employees, according to the Federal Family and Medical Leave Act (FMLA).
- We collect employee feedback through regular satisfaction surveys.
- We have implemented a bonus scheme related to company performance.

3 Social Dialogue

Social dialogue is PCI's commitment to representation of our employees in matters relating to working conditions, health and safety, and other issues. This commitment will help in making better decisions and will improve the engagement of our employees. We strive to foster a culture of openness among our employees and management staff, and to empower staff to contribute to continuously improving PCI. Our commitments to social dialogue draw upon the ILO Declaration on Fundamental Principles and Rights at Work, which includes the right of freedom of association and collective bargaining.

3.1 Objectives

To ensure structured labor relations with employees within PCI, we have formulated the following objectives:

- Respect all applicable legislation on the topic of social dialogue.
- Respect the freedom of association and cooperate in good faith with the trade unions that represent our employees within the appropriate national legal frameworks.
- Ensure no prejudice occurs with any employee who is or has been part of a union.
- Facilitate the voice of our workers on any matters relating to working conditions, health and safety, and other issues that affect staff.
- Take all issues raised through social dialogues seriously and commit to investigating suggestions that are made by our workers.
- Ensure that 100% of suggestions that arise from employee representative bodies in a calendar year are formally communicated to management and reviewed within 3 months of being raised.
- Conduct two-way communication meetings between management and employees at quarterly town halls and monthly safety meetings.

3.2 Measures

- We are committed to respecting the right to form and join employee representative instances without any negative consequences (e.g. discrimination, harassment, intimidation) or retaliation from the company.
- We have union representation at our Saddle Brook location, covering employees' health and safety, working conditions, and diversity, discrimination and harassment.
- Agendas are pre-planned for town halls. Any action items are followed up by the appropriate business leader and/or manager.

4 Child Labor, Forced Labor, and Modern Slavery

PCI categorically rejects child labor, forced labor, and modern slavery practices, or any actions that violate individual human rights and the ILO Declaration on Fundamental Principles and Rights at Work. As we set forth these principles, we envision a workplace where every employee contributes to building a fair, just, and inclusive environment for all. As part of this core belief, we seek to set strong objectives for our employees to collectively work towards.

4.1 Objectives

We are committed to the following objectives to ensure no child labor, forced labor or modern slavery practices are present in our operations and those of our direct affiliates:

- Consistently comply with all national legislation and international norms related to the employment of young workers and migrant workers.
- Ensure that our operations and business relationships adhere to the UN Universal Declaration on Human Rights, thus not tolerating any form of child and/or forced labor or modern slavery internally or from our suppliers and partners.
- Comply with the ILO Declarations on Fundamental Principles and Rights at Work, as well as with the ILO Minimum Age Convention no. 138.
- Not hire anyone under the age of 17 unless apprenticeships or internships are permitted by local law.
- Conduct due diligence to ensure these practices are not present in the company's and any of our supply chain’s employment practices.
- Encourage all employees to report any cases of child and forced labor, modern slavery, and any breach in the human rights of our employees through whistleblowing procedure (see Section 7).
- Train 100% of our workforce on the topics of child labor, forced labor and human trafficking on a 3-year cycle next due by 2028.
- Review our complaints and escalation procedures in respect of slavery and human trafficking in our wider business by 2027.

4.2 Measures

- We have a formal due diligence process to prevent child and forced labor
- We use questionnaires to assess our suppliers on any social practices, including child and forced labor
- We conduct supplier risk analyses to prevent any case of child and forced labor within our value chain
- We strictly prohibit the recruitment of individuals under 17, other than in case of an internship, students, or for similar educational purposes.
- During the application process, the question is asked are you at least 17 years of age, which is also confirmed during the onboarding process through the appropriate HRIS System with verified identification documents
- We have a whistleblower procedure to report instances of child labor, forced labor and modern slavery.

5 Diversity, Discrimination, and Harassment

It is the policy of PCI to seek and employ the best and most qualified person to perform the required duties of each employment position. It is the goal of the PCI to be an equal opportunity employer and to have a zero-tolerance policy for workplace discrimination and harassment, including sexual harassment. Likewise, unlawful harassment of employees occurring in the workplace, or in other settings such as business trips, business meetings, company sponsored events, and other occasions, will not be tolerated.

It is the policy of PCI that all employees, customers, vendors, and visitors are entitled to perform their duties, business, and visits to the company in an environment free of discrimination and sexual harassment. Harassment of any kind is unacceptable conduct and will not be condoned or tolerated. Anyone who believes they have been subjected to harassment should report the incident, in writing, directly to their supervisor. If the supervisor is the individual alleged to be committing the harassment, or the employee does not wish to engage with their supervisor on the issue, or the reporter is not an employee of PCI, they should report the incident directly to Human Resources or via the external reporting mechanism (detailed in Section 7.2).

5.1 Objectives

To support our Diversity, Equity & Inclusion ambitions, PCI has formulated the following objectives:

- Consistently promote diversity and respect between the different cultures and customs of our employees.
- Clearly communicate and encourage the use of our reporting mechanism to ensure that all instances of discrimination and harassment are dealt with according to due process and that employees feel empowered to any potential violations (See Section 7).
- Ensure that employees who report instances of discrimination and harassment are not penalized or retaliated against.
- Ensure that our recruitment is free of any discrimination through an equal opportunity approach to employment.
- Ensure 100% of discrimination or harassment-related cases brought forward per calendar year are duly investigated and if appropriate, remediated, within 3. months of being raised.
- Strive to achieve a company-wide male-female ratio consistent with regional representation by 2030.
- Strive to achieve continued representation of women in leadership positions with analysis biennially next by 2027.
- Achieve a minimum of 95% adherence to the formal, anonymized application process for all candidates applying for positions at PCI annually, analysis by the end of 2027.
- Provide training on diversity, discrimination and harassment issues to 100% of staff by 2025.
- Ensure that 100% of PCI employees with disabilities have flexible work arrangements offered and put in place by the end of 2025 to facilitate inclusive work practices.

5.2 Measures

- We comply with applicable Federal, State and local laws governing nondiscrimination in every location in which we have facilities.
- PCI is committed to developing and mentoring women, the women’s mentorship committee will define a charter and meet semi-annually by the end of 2027.
- Conduct regular awareness trainings on diversity, discrimination and harassment issues.
- Any reports will be investigated as outlined in the handbook
- We make sure to prevent discrimination during the recruitment phase.
- In compliance with the Americans with Disabilities Act (ADA), we provide reasonable accommodation for qualified individuals with disabilities.

6 Career Management and Training

PCI believes in the importance of a culture based on training and improvement. We view training as a way to foster the career development of our employees at all levels and give them an opportunity to succeed. By investing in our team's growth, we ensure that our workforce remains dynamic and skilled, capable of meeting the ever-evolving demands of our industry. Further, PCI is committed to supporting the continued growth of our employees through performance reviews and internal promotion opportunities. Our dedication to employee development not only enhances individual performance but also drives the overall success of our organization.

6.1 Objectives

PCI is committed to providing opportunities for personal development, career growth, and compensation improvement on a fair and equitable basis. To support this, we have formulated the following objectives:

- Enhance the transparent recruitment process that is communicated to all candidates with analysis of effectiveness by 2027.
- Regularly assess, refine and communicate the promotion process to maintain transparency and fairness in advancement opportunities for employees.
- Look to fill roles internally to promote appropriate candidates, before recruiting externally.
- Ensure that all educational offerings are thoroughly communicated to staff and that staff have access to procedures/steps on how to pursue external training.
- Ensure that, by the end of the performance review cycle, 90% of high-performing employees at PCI have been offered and have actively pursued promotion opportunities within the organization.
- Provide 100% of our employees with performance reviews conducted on a yearly basis.
- Provide at least an average of 10 hours of training per employee in a year by 2030.

6.2 Measures

- Our Employee Handbook detailing employee benefits and guidelines is made available to all employees.
- We have developed an Internal Job Posting program to enable internal mobility and career growth.
- We request only information required for business or legal purposes and protect the confidentiality of personal information kept on record.
- We provide every new PCI employee with an onboarding period comprising of effective orientation and training.
- Training on skills, awareness topics and industry best practices are provided.
- Performance reviews are conducted on yearly basis for all employees, and individual career plans are developed subsequently to set individual goals and track targets.

7 Complaint Mechanism

7.1 Reporting Internally (Problem Solving Procedure)

PCI encourages anyone who sees something that might be in breach of this policy to report it, aligned with our Problem-Solving Procedure. Feel free to speak with your manager, Human Resources, or a

manager of PCI if you witness or suspect any breach of this policy. The issue should first be discussed with the employee's supervisor or those directly involved in the matter. If the matter cannot be resolved:

- A meeting with the department manager or department director should be requested.
- If the matter remains unresolved, a meeting should be requested with Human Resources.

Any individual who believes they have encountered or witnessed a breach of this policy is strongly encouraged to report such concerns. We will ensure that no reporter faces retaliation or any adverse consequences for reporting a breach. We are committed to thoroughly investigating such reports and taking appropriate actions to address any confirmed violations.

In the case of any incident witnessed which may result in immediate incident, do not wait to start a formal reporting process. Instead, the witness should go directly to the person managing the activities or a senior staff member on shift to address the situation promptly. Determining what constitutes an emergency should be based on best judgment.

7.2 Reporting Externally (Whistleblower Hotline)

We encourage individuals to follow our Problem-Solving Procedure for concerns that can be dealt with in-house. However, should any individual need to make a report securely and confidentially, external reporting can also be undertaken using our External Hotline.

- **Subject Matter**: Anyone who believes that they have witnessed or experienced a violation of PCI's policies or suspects fraudulent behavior by an employee (at any level of the organization), supplier or contractor, can report it via the External Hotline. This can be done anonymously if the caller requests.
- **Reporting Procedures**: Calls can be made from any location at any time. Callers can choose to give their name or remain anonymous if they wish. All calls are documented and reported back to management, as appropriate.
- **Investigation Procedures**: Management will initiate an investigation into the matter and ensure proper resolution to the matter. If the reporter has not expressed the desire to remain anonymous, PCI will ensure that they remain informed about the process and outcome.
- **No Retaliation**: No officer, affiliate or employee of the company who in good faith reports a breach or wrongdoing will suffer harassment, retaliation, discipline or adverse employment consequence.

Reporting is available 24/7 and can be made via these channels:

By Phone: 855-400-6002; for Spanish - 800-216-1288
By email: standard-reports@mitratech.com
or go to: https://report.syntrio.com/pcinternational

Confidentiality will be maintained to the extent practical and permitted by law. Investigations will be conducted as confidentially as possible and related information will only be shared with others on a need-to-know basis. The investigation will be completed, and a determination made and communicated to the reporter as soon as practical.

7.3 Remediation Process

In accordance with the OECD Due Diligence Guidance for Responsible Business Conduct, PCI commits to providing or cooperating in remediation procedures where appropriate.

Some key elements of the remediation process through the lens of OECD include the following actions:

- Remedial Actions: If the investigation confirms wrongdoing, appropriate remedial actions will be taken. This may include disciplinary measures, corrective actions, and changes to policies or procedures to prevent future occurrences.
- Remedy to Victims: Should the wrongdoing reported result in damages to an individual, PCI will promptly address the situation by providing appropriate remedies. The type of remedy offered will depend on the nature and severity of the breach, ensuring fair and supportive measures are implemented to resolve the issue and support those affected.
- Reporting to Authorities: In cases where the wrongdoing may involve violations of laws or regulations, the findings may be reported to relevant authorities in compliance with legal obligations.
- Documenting and Reporting: The remediation process will be thoroughly documented, including investigation reports, actions taken, and outcomes. Relevant stakeholders, including company leadership, will be provided with regular updates on the company's efforts to address the reported concerns.

The ethics remediation process will follow all local laws and regulations. Impacts to the business operation will be addressed through outside counsel at the discretion of the VP of HR.

8 Policy Review, Sanctions & Approval

8.1 Policy Review

To ensure the continued validity and accuracy of this policy, an annual review will be carried out by the Policy Owner listed in Section 1.4 of this document. The review intends to identify any need for an update and make any necessary changes. The objectives and measures should be revised closely as these will almost certainly change periodically. If significant changes occur in PCI's operations, then a more frequent review of this document is advised.

8.2 Sanctions

All PCI members and affiliates are responsible for following this policy and applying it to their daily work. Further, managers are responsible for monitoring and ensuring that the personnel under their supervision follow this procedure. In the event of non-compliance with this policy, PCI reserves the right to corrective action against the perpetrator. In some instances, non-compliance may lead to relationship termination.

8.3 Approvals of the Latest Version of this Document

Revision	Date	Description / Summary of Changes	Author
000	08/01/2024	<Initial Issue>	Harner, Amanda HR OPS
001	08/29/2025	Update met goals and revise to 2030 goal timeline	Jones, Carren HR OPS
002	08/01/2026	Changed branding and all instances of “Comar” to “PCI”	Mikayla Simphaly Quality & Regulatory Engineer

With the Acknowledgement and Approval of:

ELECTRONICALLY AUTHORIZED	DATE:	9/24/26
Mary Connery, VP of Human Resources	LOCATION:	Corporate

Next Review: 8/1/2027