



GLOBAL HUMAN RIGHTS POLICY

POLICY DOCUMENT

VERSION: 2.0

EFFECTIVE/REVISION DATE: August 16, 2024

POLICY OWNER/S: Global HR Policy Management Team

DOCUMENT NO. HR-EC-GL102

INTERNAL USE ONLY

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1.0 Purpose

Human rights are basic principles to ensure everyone is treated with dignity and fairness. Sutherland is dedicated to building a company culture that supports internationally recognized human rights and works to avoid being involved in any human rights violations.

This policy communicates our expectations with respect to human rights and labor practices and the high standard of conduct expected of our employees and other stakeholders worldwide. We are committed to support the elimination of all forms of slavery, servitude, forced and compulsory labor, human trafficking, child labor and human rights abuse. We value diversity and equal opportunity and do not tolerate discrimination or harassment of any kind.

Sutherland aims to do business with suppliers who share our values with respect to human rights. [The Sutherland Supplier Code of Conduct](#) sets forth Sutherland's expectations regarding supplier conduct, including respect to human rights; labor law compliance; workplace health and safety; diversity, equity and inclusion; and other areas.

2.0 Scope

This policy applies to all employees of Sutherland and its subsidiaries, contractors, volunteers, interns, agents, external consultants, third-party representatives, business partners including sub-contractors.

3.0 Policy Statement

Sutherland upholds and respects all internationally recognized human rights as contained in the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social, and Cultural Rights (ICESCR), and the eight core International Labor Organization (ILO) conventions. We are a member of the United Nations Global Compact (UNGC) and affirm our commitment to the UN Guiding Principles on Business and Human Rights.

In alignment with the above, Sutherland makes the following commitments to respect, support, and promote human rights. We expect our partners and suppliers to make their own commitments aligned to these standards.

a. Non-discrimination

Sutherland is committed to an inclusive workplace environment free from acts of discrimination and harassment and strives to make all employment decisions based on job-related qualifications without regard to race, color, sex, age, disability, medical condition, physical appearance, national origin, ancestry, alienage or citizenship status, pregnancy, ethnicity, religion/creed, disability, genetic information, gender (including gender identity or gender expression, or status as a transgender person), sexual orientation, military or veteran status, marital or familial status, status as a victim of domestic violence, stalking or sex

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offenses, or any other category protected by applicable law, the Sutherland Code of Conduct and the Global Diversity, Equity and Inclusion Policy.

b. Workplace health and safety

Sutherland is committed to the health and safety of our employees. We maintain a global program of regular education, emergency response planning and training to ensure individuals are equipped to identify and manage potential risks in our workplaces.

c. Minimum wages

Sutherland complies with the applicable local minimum wages. We use market and industry standards to apply fair wages, where no wage law is in existence.

d. Child labor

We abide by local minimum age laws and do not use or condone child labor in any circumstance.

e. Anti-slavery and human trafficking

Sutherland has a zero-tolerance approach to any form of slavery including forced or compulsory labor. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

f. Working hours

We abide by all local working hour laws including local statutory limits on weekly hours worked. All overtime and/or statutory holiday hours are administered fairly; recorded accurately; paid correctly; and compliant with applicable employment standards legislation for the purposes of overtime pay. We recognize the need for employees to have regular breaks, vacations, and establish an efficient work-life balance. We do not use forced or compulsory labor. All employment is voluntary.

g. Freedom of association

We respect the right of our employees to freely participate in labor unions, or choose not to participate, and the right to collectively bargain, in accordance with local laws.

h. Data Privacy

In order to protect the personal data of its employees, Sutherland maintains high level data privacy standards. Data privacy standards are implemented in

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accordance with applicable legislations. Sutherland expects its employees to comply with data privacy laws in each of the countries it operates.

i. Responsible Sourcing

We have a large and diverse supply chain, and we recognize the critical role our suppliers play in helping us to source responsibly and sustainably. Our Supplier Code of Conduct, together with Global Strategic Sourcing Policy sets out our expectations with regards to the respect for the human rights, including labor rights, of the workers in our extended supply chain. We work with suppliers who agree to ensure transparency, remedy any shortcomings, and to drive continuous improvement. Our policies contain clear requirements and guidance on grievance mechanisms.

4.0 Risk Assessment, Prevention, and Remediation

Whilst the principles contained herein are subject to national laws and ethical best practices, internationally accepted human rights are to be always adhered to as a minimum, at all points in time.

It is the responsibility of every employee to be alert to any potential violations and to ensure compliance with this policy. If a potential violation occurs, the employee must promptly notify our Corporate Ethics department and Global HR Team, who in turn will take appropriate remedial action. Should Sutherland identify any risk of contributing to an adverse impact in human or labor rights, it will take the necessary steps to cease or prevent its contribution and use its leverage with internal and external business networks to mitigate any remaining impacts to the greatest extent possible.

5.0 Human Rights Assessment and Evaluation

We conduct a human rights impact assessment and have identified key human rights metrics to evaluate and address risks and issues. We will track results annually to determine priority areas. The metrics include:

i. Quantitative Metrics:

- Incident Tracking & Response: Track incidents of workplace discrimination and harassment and implement measures to redress.
- Pay Equity: Conduct regular gender pay reviews and put plans in place to address gender pay gaps identified.
- Leadership Diversity: Track the representation of diverse employees in leadership positions and put programs in place to hire and promote underrepresented groups into leadership positions.
- Supply Chain Assessments: Increase the number of suppliers and partners audited and certified for human rights compliance with the aim of eliminating incidents of forced labor or human trafficking in the supply chain.

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ii. Qualitative Metrics:

- Health & Safety: Promote health and safety best practices and address incidents timely.
- Wellness; embed awareness of wellbeing into our culture through a global wellness program.
- Diversity, Equity and Inclusion (DEI); ensure awareness of our policy and promote leadership engagement to embed DEI into all employee related decisions.
- Training & Awareness: Ensure that employees and stakeholders receive adequate training on human rights and are aware of the reporting channels.
- Timely intervention: Ensure timely and prompt intervention in reported cases of human rights violations without fear of retaliation.
- Stakeholder Feedback: Collect and analyze feedback from internal and external surveys, focus groups, research projects, and interviews to identify potential concerns and areas for action.

6.0 Ownership & Governance

This policy is owned by the Global HR Policy Management Team. All employees are responsible for ensuring compliance with the provisions of this policy. Corporate Ethics and Human Resources are responsible for communicating and reviewing the contents of this policy from time to time.

Sutherland's Office of Sustainability, a cross-functional team of executives and senior-level employees, provides oversight and advice on Sutherland's overall human rights management strategy.

7.0 Policies for reference

- [Supplier Code of Conduct](#)
- [Diversity, Equity & Inclusion Policy](#)
- [Global Strategic Sourcing Policy](#)
- [Sutherland Environmental Policy](#)
- [Sutherland Occupational Health and Safety Policy](#)

8.0 Effective Date, Repealing Clause & Request for Exemption

This updated policy takes effect on 16 Aug 2024 and will be automatically reviewed every two (2) years from the last recorded revision date. Geo HR Heads are required to review and revise/repeal any local policy that is redundant or inconsistent herewith. Any request for exemption due to local regulation requiring a deviation from this policy should be reviewed by Corporate Ethics and Global HR Team and then endorsed to the Global HR Policy Management Team for approval.

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9.0 Review & Approval History

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Localizations - Business		None			
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Version	Author	Changes Made	Reviewed by	Approved by	Effective Date
1.0	Global HR Policy Management Team	New Policy	Abhishek Agarwal	Erich Tinch James S. Lusk	April 12, 2022
2.0	Abhishek Agarwal	Added reference to international standards, clarified policy scope, included policy goals and other consequential changes	Idania Quintanilla Julie Clarke Anju Talwar	Anil Joseph	August 16, 2024