



HUMAN RIGHTS POLICY



PUBLIC



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Purpose:

This policy reflects CES's commitment to protect and advance human dignity and human rights in CES business practices. This policy applies to all personnel employed by or engaged to provide services to CES, including, but not limited to, CES's employees, officers, and contingent workers, as well as CES's contractors and suppliers.

Policy:

CES's relationships with its employees, contractors and suppliers and with the countries and communities in which CES operates are intended to reflect the principles, policies, and codes established and referred to in this policy. CES Code of Conduct is founded on responsible, honest and ethical behaviour, and the character of CES is defined by the personal integrity and honesty of its employees. The CES Code of Conduct is the means to implement its human rights values and commitments.

This policy is guided by the Ten Principles of the United Nations Global Compact as derived from: The Universal Declaration of Human Rights, the International Bill of Human Rights and the International Labor Organisation's 1998 Declaration on Fundamental Principles and Rights at Work. CES is committed to compliance with all applicable employment, labor and human rights laws to ensure fair and ethical business practices are followed. CES's respect of human rights is demonstrated in its employment practices, including non-discrimination, diversity and inclusion, minimum age requirements, freedom of association and respect for collective bargaining and fair compensation policies. CES further demonstrates its dedication to human rights in the commitment to providing healthy, safe, and secure workplaces, and to promoting the health and safety of the communities in which it operates.

We expect our employees, contractors and suppliers to comply with the law in each place we do business and to abide by our Business Ethics and Compliance Policy, Code of Conduct or, as applicable, our Supplier Code of Conduct. Implementation of compliance with the Code of Conduct is overseen by the Chief Compliance Officer. CES Human Rights Policy is consistent with and incorporates the principles set forth in our policies which prohibit discrimination, child labor and human trafficking, modern slavery and forced labor.

Our goal is to conduct business with those who share our commitment to these same principles. CES will continue to require commitment to human rights from its contractors and suppliers. To ensure this commitment is met, CES includes in its supplier and service provider agreements a requirement that its business partners operate under business and ethics standards consistent with CES own standards.



Investigations and Audits

CES reserves the right, where applicable, to conduct investigations and audits to verify that business is being conducted in compliance with this policy. All CES employees and third parties through whom CES conducts business are required to fully, accurately and promptly cooperate.

Policy Compliance

CES is committed to conducting business with the highest levels of integrity, in full compliance with the spirit and integrity of the laws of each country in which we operate as well as in full compliance with our Code of Conduct. We encourage anyone who believes that this policy has been violated to report their concerns to the Chief Compliance Officer. Employees who fail to report actual or suspected misconduct may be deemed in violation of this policy as permitted by applicable law. CES will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.