

Human Rights and Labor Standards Policy



This document was approved by Human Active Technology (HAT) executive management and is publicly available on our website. All employees are informed about the contents of this document.



Introduction from our CEO: Steven Bramson

As a global company HAT believes it has the responsibility, as good corporate citizens, to respect Human Rights and comply with international laws. HAT's values guide the attitudes, behaviors and decisions of all HAT employees and consultants around the world as we interact with our customers, our partners, our suppliers, the communities in which we work and live, and – most of all – each other. This Human Rights and Labor Standards Policy is an important and critical part of our commitment to these values, as its focus is to ensure that our employees and nonemployee workers around the world are treated with dignity, fairness and respect.

My personal commitment is that I will do everything I can to ensure that all of us at HAT maintain our standards of conduct and our respect for each other, by setting a personal example and taking a proactive interest in our performance as individuals and as a team. I am confident that all our employees at HAT will do the same.

Steven Bramson

CEO

September 2022



Human Rights and Labor Standard Policy

This Human Rights and Labor Standards (the “Policy”) is applicable to all full time, part-time and temporary employees (collectively “Employees”) and agents, representatives, consultants, advisors, and other similarly titled independent contractors (collectively “Consultants”) of Human Active Technology (the “Parent”), its branches and its wholly owned subsidiaries (the “Subsidiaries”). The Parent, branches and Subsidiaries are collectively referred to herein as the “Company”.

As part of this Policy, the Company recognized the United Nations Declaration of Human Rights.

1. Our Code of Conduct and Ethics

HAT has published its Code of Conduct and Ethics which is communicated to all employees and publicly available on our corporate website. The purpose of the Code is to ensure that all HAT employees and those acting on our behalf are aware of the standards of ethical behavior and integrity in all business dealings that are required of all Directors, management and staff. These standards both protect us from business risk and support the development of trust and positive relationships with all business associates, colleagues and partners. The Code of Conduct and Ethics outlines the Company’s expectations with regards to personal behavior and respect for individuals.

2. Our Workplace Practices

At HAT, we strive to attract, engage and retain employees who can help deliver our business strategy in a way which aligns with our core commitment to our core values, ethical conduct and integrity in all we do. We recruit highly competent individuals on the basis of appropriate education, training, skills, and experience. Our commitment to our employees is to respect and uphold their rights in all aspects of their employment and engagement with HAT. Our approach to creating an ethical working environment stems from a basic appreciation and respect for core internationally accepted labor standards. These employee rights are encompassed in the globally ratified International Labor Organization’s Declaration of Fundamental Principles and Rights at Work which we support and are enhanced by advanced human resources practices.

3. Employee Rights

We believe that employees should know their rights in respect of their employment with our Company. Employees join HAT out of their own free will and in full agreement to the proposed terms and conditions. We do not require any employee to remain in employment for any period of time against his or her will or use practices which restrict employees' ability to terminate employment. We do not engage in forced labor in any way, and we do not employ children in any part of our business operations. As a minimum, HAT employees are rewarded in accordance with laws and regulations governing salaries and benefits in each country in which we operate. Further, we respect the right of employees to open communication and human and equitable treatment. We maintain open and direct communication with our employees through our Human Resources Department and encourage their full participation in our business. We provide updates to employees about business activities and results, and all other matters which affect them, or may help them perform their roles more effectively. During the course of employment, management and members of our Human Resources team are committed to responding to all questions or grievances raised by employees relating to terms and conditions, rights and any other matters of concern.

4. Equal Opportunity, Diversity, and Inclusion

We strive to maintain an inclusive work culture in which each employee feels respected and valued and has the opportunity to develop and grow in line with business needs and personal aspirations. We offer all individuals equal opportunity to join the Company, and to progress within the Company according to performance and potential. We embrace employees from all possible backgrounds representing different dimensions of diversity which include gender, race, color, religion, nationality, age, sexual orientation, disability, and other aspects of diversity. We aim to ensure that our workplace is free of all forms of discrimination, harassment, violence and other behaviors which might negatively impact the workplace experience, such as alcohol or substance-abuse. Company's employees receive periodic trainings on relevant issues relating to anti-harassment and discrimination.

5. Employee Health and Safety

HAT aims to provide all employees with a workplace which is healthy and safe, and free from all known health and safety risks. We observe all laws and regulations regarding employee safety. We uphold OSHA standards for health and safety management and an integrated quality, environment, health and safety and supply chain policy.

6. Human Rights in Our Supply Chain

We aim to uphold the human rights of all those affected by our business activities, and in particular, of the employees engaged in our supply chain. We are guided by our respect for internationally recognized human rights, which include those set out in the Universal Declaration of Human Rights and in the International Labor Organization's Declaration of Fundamental Principles and Rights at Work. We uphold all applicable laws in all countries in which we operate and treat all those with whom we interact with respect and dignity. We adhere in all material respects to the United States Conflict Minerals Rule (i.e., Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act). As part of compliance with the Rule, we carry out due diligence on the source or approximated source of Conflict Minerals (i.e., Tin Tantalum, Tungsten and Gold) originating from high risk or conflict afflicted areas in the Covered Countries. We require and expect all of our relevant suppliers to comply with our request for information on the source of approximated source of Conflict Minerals.

7. Supplier Engagement and Contract Operations

We work with outsourced vendors for the supply of our products and components which are manufactured and assembled to our specifications. In general, we cultivate long-term relationships with our outsourced vendors, who are of themselves large national or global, respected business operations that are familiar with our approach to human rights and labor standards. Of necessity, we work closely with our outsourced suppliers enabling us to observe the standards that are maintained, and the workplace conditions provided to their employees. We strive to have our outsourced vendors and key suppliers confirm that they observe the following practices which protect labor rights and human rights:

- Respect for employees and treating employees with dignity, applying humane, decent and fair practices. To the extent possible, suppliers will invest in employee training and development.
- Encourage diversity and avoidance of discrimination in the workplace.
- Declare support for freely chosen employment and prohibit any form of forced labor.
- Prohibit child labor under the legal age permitted by law in the country of operation.
- Act in accordance with working hours as defined by local laws.

- Observe laws and regulations relating to health and safety of employees.
- Compensate employees in accordance with applicable laws and regulations.
- Provide formal grievance mechanisms for employees to voice their concerns and receive appropriate acknowledgement without fear of retaliation.

8. Sourcing and Supply

We aim to source all the materials used in our supply chain for the manufacture of our products in a way which upholds human rights, for example, taking in to account the rights of indigenous peoples in extractive industries for metals and elements used in our products. We expect our suppliers to engage in responsible sourcing practices, using verified sources where possible. Consistent with this Policy HAT established a detailed Conflict Minerals Policy addressing the Human Rights and environmental issues connected with the mining and trading of tantalum, tin tungsten and gold which are used in the electronics industry supply chain.

This policy may be amended from time to time with or without notice by the Company.