

HUMAN RIGHTS POLICY STATEMENT

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Objective

A company must center people in everything it does to grow sustainably and stay competitive. This includes providing employees with intentional and rewarding professional development opportunities and encouraging the various members of our direct or indirect ecosystem to follow ethical practices.

The United Nations (UN) supports the idea that every company is responsible for the impacts and responsibilities it has on individuals through its activities.

Human rights cover three major areas:

- Respecting individuals, their dignity and their fundamental rights in the personal, collective and social realms
- Fighting discrimination and promoting equal opportunity
- Protecting stakeholders' personal and/or confidential data

This policy outlines the social and human rights policy commitments of ITC Group (comprising ITC Translations USA, Inc., SAS International Traduction Conseil – ITC, and ITC Traductions Canada Inc.).

The goal of this policy is to tell our employees, clients, suppliers and vendors about the ethical and social values that ITC Group follows and expects others to follow in all our business decisions, activities and partnerships.

This policy highlights ITC Group's commitment to respecting human rights and the values of integrity, respect, fairness and ownership. We do this in compliance with internationally recognized laws and frameworks, as well as relevant national laws in the countries where ITC Group operates.

Implementation

The relevant departments send this Statement to all employees via internal communications channels and to our business partners. We take appropriate steps and measures with a due diligence-based

approach to human rights to identify, prevent and address any adverse effects to human rights we may cause or contribute to or where an effect is directly linked to our operations, products or services through a business relationship. As human rights issues are systemic, we also expect our business partners to take appropriate steps and measures with a due diligence-based approach to identify and address any adverse human rights effects they may cause, contribute to or be linked to through their business relationships.

Our principles

Human rights issues are broad and complex, so we identified the six key prioritized areas outlined below. We are committed to focusing our efforts in these areas but recognize that other human rights issues may become priorities over time. We, therefore, review our focus areas regularly and will update this Statement accordingly.

1. Employee Health and Safety

In compliance with legal requirements in France, each new employee who joins the company is required to have an in-person or remote medical visit with a doctor at Agemetra.

ITC Group supports employee wellness. The Human Resources department tracks participation at webinars to better respond to employee expectations around working conditions. ITC Group also hosts workshops on wellness at work that include meditation, breathing exercises and advice for managing stress and finding a balance between personal life and professional life.

Although working remotely has many advantages, it contributes to a sedentary lifestyle that can be problematic for employee health. ITC Group regularly organizes challenges to get people moving via the Squadeasy or Kiplin apps. Over several days or weeks, employees are invited to walk, run or ride their bikes to help their team win a challenge.

ITC Group cares about the health of our employees and works with a broker that renegotiates insurance contracts to offer the best health insurance, disability and supplementary retirement terms in every country in which ITC Group has locations.

2. Working Conditions

Implementing remote work – Due to the pandemic, ITC Group decided to implement remote work for the well-being of our employees. This arrangement is governed by a specific policy.

Remote work is now available five days per week to all part- and full-time employees, including those with CDI (permanent) and CDD (fixed-term) contracts in France, temporary and seconded employees, work-study employees and interns. Prior to starting remote work, the employer asks employees to make sure their electrical setup is compatible and provide evidence of multi-risk home insurance, including liability insurance that covers them for work completed at home.

Employees are invited to come to our coworking spaces whenever they want so they can still spend time with colleagues and maintain team cohesion.

At home, employees are equipped with:

- Secure access to the company network through VPN
- A computer with a webcam
- A mouse
- A keyboard
- A chair
- A second monitor
- A screen stand
- A foot rest

Creating a respectful work environment – ITC Group respects the dignity of each person and appreciates their particular skills. Individuals must be treated fairly and with respect regardless of their appearance, beliefs, culture, affiliations or any other personal characteristic. Discrimination, harassment and any unfair treatment that violates an individual's dignity will not be tolerated in the course of ITC Group's activities and those of our suppliers. Employees must be able to report problems related to discrimination, harassment and any unfair treatment without fear of reprisal.

ITC Group commits to providing a fair, consistent and inclusive environment and makes all employment decisions based on neutral and objective criteria. In addition to complying with all applicable laws, ITC Group and our suppliers will not engage in or tolerate any discrimination, harassment or unfair treatment based on an individual's race, color, ancestry, ethnicity, religion, sex, pregnancy, national origin, age, disability, marital status, veteran status or obligation to military service, sexual orientation, gender identity or expression or genetic information.

Employing and compensating our staff appropriately – We appreciate our employees and suppliers and believe that if we treat them well, they will in turn treat our clients well. ITC Group commits to:

- Providing compensation, work hours, breaks, rest days, vacations and holidays in compliance with applicable legal requirements and agreements.
ITC Group provides a platform that facilitates employee leave requests and also provides access to the company's leave policy. Leave is fairly allocated among employees. In the United States and Canada, teams have more leave than regulations require with four weeks of leave per year. ITC Group gives employees time off on the afternoons of December 24 and 31 to help them balance their private lives and professional lives.
- Paying wages at regular intervals and not making any illegal or excessive deductions from wages, not withholding salaries or not delaying salary payments.
- Complying with all applicable laws, regulations and agreements regarding the employment of young workers.
- Recognizing freedom of assembly and collective bargaining. Respecting the right of workers to join or not join a worker's association or union without interference in compliance with applicable legislation and practices.

- Verifying that all employees are properly authorized to work.

3. Labor Relations

Since our founding, ITC GROUP has built a culture based on the values of trust, mutual respect, and dialogue. ITC GROUP management and employees all over the world work daily to create and maintain positive individual and collective relationships and are expected to do so as a core part of their job. ITC GROUP focuses on implementing the following strategic areas:

- Enhanced collective dialogue and negotiations with staff representatives. These meetings are held once a month.
- Open dialogue with external stakeholders on labor matters.

ITC GROUP promotes continuous improvement of working conditions, giving special attention to the following priorities:

- Respecting the right of our employees to establish and join organizations of their own choosing and engage in constructive negotiations.
- Offering competitive wages and benefits that allow our employees to cover their needs according to local standards of living.
- Following ITC GROUP guidelines regarding “outsourced activities” which indicate that the people performing them will be always treated fairly.
- Providing a safe and healthy workplace and a working environment that respects our employees’ family lives.
- Treating every employee with dignity and never tolerating discrimination, harassment or abuse.

ITC GROUP ensures that direct and frequent communication is established at the workplace between management and our employees. While dialogue with the staff representative is essential, it does not replace the close relationship that our management maintains with our employees. Regular dialogue with our employees and staff representatives creates an opportunity to discuss matters of mutual concern and allows our employees to acquire a full understanding of the company’s business activities and the objectives. In the spirit of continuous improvement, we encourage dialogue with our employees that goes beyond the traditional aspects of collective bargaining in order to share knowledge and to identify opportunities together related to other important matters such as health and safety in the workplace and caring for the environment.

4. Career Management and Training

Professional meetings are scheduled every two years to discuss training requests so that employees can learn, thrive and build their skills.

Annual reviews give our managers an opportunity to talk about the past year with their employees and discuss the successes and challenges experienced and decide together on the goals to set for the following year.

We also follow up with managers to make sure they maintain a good balance between professional and personal lives.

A Learning Management System (LMS) to consolidate all trainings ITC Group provides to employees and suppliers is scheduled for implementation in 2023.

Managing talent – Our HR policy is to offer our employees the opportunity for internal advancement when possible and/or to be assigned to our foreign offices.

5. Child Labor, Forced Labor and Human Trafficking

We recognize the human rights of children, such as the right to education, right to play, and right to basic needs and follow the International Labour Organization's definitions on the minimum age for employment and hazardous work and aim to align with the Child Rights and Business Principles.

Modern slavery is a crime and a violation of fundamental human rights. ITC GROUP is committed to eliminating all forms of slavery and participating in the international effort to abolish child labor and human trafficking and has a zero-tolerance approach to such activities.

- No employee and supplier of ITC GROUP may hire child or forced labor or conduct or support human trafficking on behalf of ITC GROUP.
- All employees and suppliers should be alert to any evidence of slavery, child labor or human trafficking in operations linked to our businesses. If an employee or supplier suspects slavery, child labor or human trafficking is occurring, they should report their concerns immediately to compliance@itcglobaltranslations.com.
- Student educational work experience that has been approved by ITC GROUP in accordance with international standards and local applicable law is not considered child or forced labor.

6. Diversity, Discrimination and Harassment

ITC Group supports increased diversity and inclusion through our various internal recruiting, onboarding and training policies to ensure all human profiles found in society are represented without distinction for profile, gender, age, cultural origin, beliefs or disability. This mainly includes writing gender-neutral job postings and recruiting through resumes that do not include photos.

ITC Group follows and complies with applicable legislation in the countries where we operate: discrimination of any kind is prohibited and company employees have the same rights and access to the same services at all times in their work environment. Harassment and offensive, derogatory, hostile, undesired or repeated behaviors or comments are not tolerated and are subject to disciplinary action.

In support of this, ITC Group follows and supports the Charter of Human Rights and Freedoms that prohibits harassment of any person on the basis of age, marital status, language, religion, social condition, pregnancy, sexual orientation, sex, political belief, disability, race or color, ethnic or national origin, gender identity or expression. As an employer, ITC Group takes necessary measures to provide a harassment-free workplace.

Empowering Women through Rights, Skills and Opportunities – Around the world many women face discrimination and disadvantage, lack access to skills and training, and face roadblocks to their active participation in the economy. They often lack the protection of basic rights and laws. Poverty, discrimination and violence against women are major barriers to opportunity.

As a certified Woman Owned company, women are integral to our business model and growth ambitions. We seek to manage and grow socially responsible businesses where women participate on an equal basis. We believe that women’s rights and economic inclusion are priorities that support long-term wins.

Our approach starts with respecting the rights of women and extends to promoting them, helping them expand their skills and opening up opportunities, both in our own operations and our value chain.

Leading with transparency

ITC Group’s ambition is to lead the way to a more sustainable and responsible future for our industry. We want to drive progress for people and the planet, and we believe that impactful and meaningful growth is how we continue to stay relevant to our customers and colleagues and secure our long-term business success.

By being transparent with our ambitions and learnings, we hope to inspire action and open up for collaboration. We still have a lot to learn, but we know we have the experience, curiosity and determination to make a difference.

REVISIONS AND VALIDATION

Document Revisions

No.	Document Version	Revision Description	Revision Date	Reviser

1	V1	Creation of ITC Human Rights Policy Statement	10/10/2022	M.Lavarenne
2				
3				
4				
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Document Validation

This document and its version number have been logged in the ITC Document Tracking file. It has been signed off and validated by the ITC HR Manager.

Date: 10/10/2022

Name: M. Lavarenne

Signature: 