

# Human Rights Policy



## **PURPOSE**

Since NCH's founding in 1919, a commitment to respect the dignity of all people and communities has guided our company. Our goal is to entrench human rights in all aspects of our business. We believe all of our Associates<sup>1</sup> and Business Partners<sup>2</sup> around the world deserve to be treated with dignity and respect and we all have a responsibility, both individually and corporately, to bring this policy to fruition. As proof, NCH is committed to respecting and adhering to internationally recognized Human Rights standards, as established in the Universal Declaration on Human Rights and the International Labor Organization's Core Conventions and we expect our business partners, including suppliers, to adapt to similar values.

## **APPLICATION**

NCH's Human Rights policy applies to all NCH employees worldwide, this includes anyone doing business for or with NCH and others acting on our behalf. This policy applies to all locations where NCH conducts business and includes all its subsidiaries and affiliated businesses, as well as all company-sponsored events.

## **POLICY**

This policy is to be viewed in conjunction with the NCH Code of Conduct and reiterates the expectations for our associates and our business partners to identify, prevent, mitigate and account for how we address adverse social impacts. In addition, the Human Rights policy exists to provide a framework for guiding NCH's ongoing Labor and Human rights improvement efforts to:

- Inform employees, business partners, suppliers and customers of NCH's commitment to human rights;
- Establish NCH's commitment to 'know and show' its respect for human rights through on-going human rights due diligence;
- Maintain NCH's high ethical standards and
- Contribute to the realization of human rights globally.

Furthermore, NCH conducts its business in a manner that respects the rights and dignity of all people, complying with all applicable laws and regulations. Our policy reflects our commitment to respecting and protecting internationally recognized Human Rights practices.

At NCH adverse social impacts include areas such as Child Labor and Human Trafficking, Employee Health and Safety, Working Conditions, Diversity, Discrimination and Harassment, and Career Management and Training.

- I. All employment with NCH is voluntary. We do not use child or forced labor in any of our operations or facilities. We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude. We fully respect all applicable laws establishing a

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<sup>1</sup> "NCH Associates" include all employees of NCH Group,, and employees of the controlled JV Partners.

<sup>2</sup> "Business Partners include all contingent workers, contractors, and non-employee sales representatives

minimum age for employment, in order to support the effective abolition of child labor worldwide.

- II. NCH abides by all laws and regulations regarding pay practices and the classification of employment according to job level and status.
- III. Diversity is embraced at NCH. We recognize that a diverse mix of backgrounds, skills and experiences drives new ideas, products, and services and provides us with a sustained competitive advantage.
- IV. We believe everyone should be treated with respect regardless of their background. We are committed to the elimination of discrimination based on gender, race, class, religion, economic status, ethnic background, sexual orientation and gender identity and expression, disability, age, political beliefs, veteran status, marital status or any other protected class.
- V. The NCH Supply Chain Management contracts require all suppliers, vendors, contractors, consultants and agents to adhere to the agreed upon conditions and language, which often times mirrors NCH's Employee Code of Conduct policy.
- VI. NCH respects all human rights and expects those with whom it does business to respect all human rights.
- VII. NCH reserves the right to take the appropriate disciplinary action, up to and including termination of employees, contractors, subcontractors, agents and partners, who violate, participate in, or were aware of and failed to report such activities. This includes the right to terminate business relationships with vendors and companies who are involved in activities that violate human rights.

## **IMPLEMENTATION**

Successful implementation of any policy comes from the correct tone exhibited by the top management of an organization. At NCH, the Board and its Directors fully support this stand along policy, the Employee [Code of Conduct](#) and the [Human Trafficking Policy](#) and the following steps of execution.

- I. Create procedures, training and internal reporting structure to embed this Policy throughout the company.
- II. Provide a safe and healthy workplace for all associates, contractors, and subcontractors. This may include security guards hired by the company. The security staff must be trained on use of force and adherence to Human Rights standards and regulations.
- III. We are committed that our workers are to be in a safe environment, and that NCH will strive to abide by all occupational health and safety regulations. When necessary, workers will be provided with safety equipment as appropriate to the work being performed.
- IV. All associates are to follow the principles as established in the Universal Declaration on Human Rights, which is a commitment to guarantee the fundamental freedoms and protecting the human rights of all who we come in contact with as part of our NCH job responsibilities.

- V. All associates are to exercise common sense and good judgment in determining if a Human Rights violation has occurred. If you believe a Human Rights violation has occurred, you are to immediately report the offense to the Chief Compliance Officer (CCO) or your Manager.
- VI. Associates are also to conduct human rights due diligence inquiries wherever feasible, extending through our operations and supply chain creating a company “duty to know” about and disclose Human Rights risks. This due diligence encompasses all new projects and significant modifications to existing operations where there is the potential for negative human rights impact, and seek to employ reasonable measures to mitigate those impacts.
- VII. NCH will only employ people above the minimum employment age set by local law. We will make every effort not to employ individuals under 18 years of age. However, regarding our suppliers, manufacturers or vendors, we will seek reasonable assurances that they will not knowingly use or employ individuals below the age of 16, except if allowed by local law and such exception is consistent with the guidelines of the International Labor Organization.
- VIII. Promote fair competition, including respect for property rights.
- IX. Meaningfully engage with the local communities, schools, businesses, government, and other stakeholders affected by our operations to create and maintain transparent relationships built on mutual respect and trust.
- X. Take appropriate action where we identify violations of this Policy by employees or contractors.

## **GOVERNANCE**

- I. Oversight - While the adherence of human rights are the responsibility of all employees at NCH, primary oversight and responsibility for the implementation of this policy rests with the CCO. The CCO will be assisted by the Legal General Counsel and the Chief Human Resource Officer. These Human Rights mandates are incorporated into current business charters.  
Gross Human Rights abuses will be treated as “legal compliance issues,” given the substantial legal repercussions flowing from human rights non-compliance.
- II. Training and Communications - Human Rights training will be incorporated into the Core 5 web-based platform currently used at NCH. Human Rights will be discussed during on-boarding/induction of new associates as well as annually with our Code of Conduct, FCPA Anti-corruption, Ethics and other courses.
- III. Operational Diligence - NCH will conduct periodic desk-top analysis/assessments to include questionnaires, interviewing and testing to identify red flags and other risks and how they are being addressed. Controls will be instituted for Human Rights elements of associates and third parties posing enhanced risks.
- IV. Hotline and Grievance Mechanism – NAVEX Global: Questions regarding NCH’s Human Rights policy, and any grievance concerning the same, may be directed to the local Country Manager and/or the local Human Resources Dept. or Chief



Compliance Officer by e-mail, at [compliance@nch.com](mailto:compliance@nch.com), or <http://www.alertline.com>, or by telephone at 1-888-471-4033 or if outside the U.S. by contacting the AT&T website at: <http://www.business.att.com/bt/access.jsp?c=0>.

- V. This policy will be reviewed annually. The next review will be on or about August 1, 2021.