



## **Human Rights Policy**

### **Introduction**

Ampacet Corporation advances the future of plastics by bringing forward-thinking solutions to our customers that increase product performance, durability and sustainability. We are committed to achieving sustained growth and profitability by designing innovative, cost-effective and sustainable solutions to enhance plastics' visual appeal, functionality and performance beyond limits. We are committed to our core values of safety & sustainability, diversity, accountability and innovation.

### **Purpose**

Ampacet is committed to developing an organizational structure which implements a policy of awareness and support for internationally recognized human rights. While governments have the primary responsibility to protect against human rights violations, we understand and are committed to the recognition and safeguarding of human rights in all the countries in which we operate.

Human rights are generally defined as the basic freedoms believed to be inherent to all people. They are outlined in the Universal Declaration for Human Rights, ([Universal Declaration of Human Rights | United Nations](#)), as well as The International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work, (<https://www.ilo.org/ilo-declaration-fundamental-principles-and-rights-work>).

The purpose of this Human Rights Policy (this "Policy") is to highlight some of those key commitments. This Policy applies to all Ampacet employees, officers, directors, contractors, subcontractors, vendors, suppliers, partners and others through whom we do business. This Policy is intended to supplement Ampacet's Global Code of Conduct, Supplier Code of Conduct (see "References" section below) and other policies as may be adopted or amended from time to time (together, "Ampacet Policies") which are incorporated by this reference.

### **Prohibition of Slavery and Human Trafficking**

Ampacet opposes any form of forced or involuntary labor, whether in the form of slave labor, forced prisoner, indentured labor, bonded labor or other forms. Directly or indirectly engaging in mental or physical coercion, slavery or human trafficking is prohibited through the entire supply chain. Workers must be free to terminate their employment. All workers have the right to engage in work willingly and have full freedom of movement, without surrendering travel documents and without the payment of fees for their employment.

## **Prohibition of Child Labor**

Ampacet opposes the use of all forms of child labor. We expect our customers and suppliers to do the same. Employees must be at or over the local legal minimum age for work or mandatory schooling age. When young employees are employed they must not do work that is mentally, physically, socially or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school.

## **Fair Compensation**

Ampacet employees must be provided with a total compensation package that includes wages, overtime pay, benefits and paid leave which meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher, and compensation terms established by legally binding collective bargaining agreements are implemented and adhered to.

## **Working Conditions**

Ampacet must adhere to the legal and contractual rights of employees, both permanent and casual. We are committed to complying with all applicable wage laws, including minimum wage, working hour limits, overtime hours, and legally mandated benefits and keep accurate and complete records of worker hours and wage documentation in accordance with applicable law.

## **Prevention of Discrimination and Harassment**

Ampacet is committed to treating all employees with respect and dignity. No employee should be subject to any physical, sexual, psychological, verbal harassment, violence, abuse or other form of intimidation. There shall be no discrimination in employment, including hiring, compensation, advancement, discipline, access to training, termination or retirement. Discrimination, based on race, age, role, gender, gender identity, gender expression, color, ethnicity or national origin, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, protected genetic information, veteran status, union membership or political views or political affiliation or any other basis protected by law is prohibited.

## **Safety**

At Ampacet, dedication to health and safety is a fundamental value. Ampacet is committed to promoting a healthy and safe workplace that aims to prevent accidents and injury arising out of, or occurring during work or as a result of the employer's operations.

## **Freedom of Association**

Ampacet is committed to providing an environment whereby the legal rights of employees to freedom of association and collective bargaining are recognized and respected. Employees must not be intimidated or harassed in the exercise of their legal right to join or refrain from joining any organization.

## **Community**

Ampacet respects human rights and recognizes that the welfare of the global communities in which we operate is important to our success. We encourage investing in our communities and contributing both time and resources to promote the quality of life and welfare of the people who live there. We respect the rights and title to property and land of the individual, indigenous people and local communities. All negotiations regarding their property or land, including the use of and transfers of it, must adhere to the principles of free, prior and informed consent, contract transparency and disclosure.

## **Suppliers**

At Ampacet, we take our commitment to human rights seriously and expect the same from those with whom we do business. Suppliers will require that these expectations be implemented throughout their own supply chains consistent with those described in this Policy and in Ampacet's Supplier Code of Conduct (see "References" below).

## **Integrating Sustainability and Climate Commitments**

Ampacet recognizes that the protection of human rights is deeply interconnected with environmental sustainability and climate responsibility. To reflect this integrated approach, Ampacet is committed to aligning its human rights practices with broader sustainability objectives, ensuring that human rights and environmental protection are mutually reinforcing within our operations and throughout our supply chain.

## **Due Diligence and Risk Assessment**

Ampacet is committed to proactively identifying, assessing, and addressing human rights risks in its operations and throughout its supply chain. This due diligence and risk assessment process is a core component of Ampacet's commitment to safeguarding human rights, ensuring compliance with this Policy, and continuously improving our practices. Ampacet conducts regular risk assessments across all levels of operations to identify actual and potential human rights risks, including issues related to forced labor, child labor, discrimination, health and safety, and environmental impact. Based on the findings of our risk assessments, Ampacet develops preventive and corrective action plans to address identified risks. Where human rights violations are identified, Ampacet takes immediate corrective actions.

## **Governance and Accountability**

The Ampacet executive management team is responsible for the implementation of this Policy and related due diligence processes ensuring that risk assessments are conducted regularly and that appropriate preventive and corrective actions are taken. Executive management is also responsible for ensuring that reports of potential human rights violations are thoroughly investigated and resolved.

## **Reporting Potential Violations**

All suspected violations of law or of this Policy should be reported to Ampacet's Chief Compliance Officer or Executive Director Human Resources at [ampacet.compliance@ampacet.com](mailto:ampacet.compliance@ampacet.com) or by telephone (914) 631-6600 or by mail at Ampacet Corporation, 660 White Plains Road, Tarrytown, NY 10591. Ampacet respects the right of individuals to report anonymously and ensures that all reports are

handled with strict confidentiality. Ampacet maintains the highest levels of data security to protect the confidentiality of all reports.

Ampacet enforces a strict non-retaliation policy to protect individuals who report concerns in good faith. Any form of retaliation, harassment, or discrimination against individuals is strictly prohibited. The non-retaliation policy applies to all employees, contractors, and suppliers, safeguarding individuals against any adverse actions as a result of raising concerns.

The Chief Compliance Officer and Executive Director Human Resources are responsible for overseeing all investigations relating to potential violations of this Policy. Any necessary investigative activity will be conducted ensuring a fair and unbiased process.

References:

Ampacet Global Code of Conduct (<https://www.ampacet.com/wp-content/uploads/Global-Code-of-Conduct-April-2024.pdf>)

Ampacet Supplier Code of Conduct (<https://www.ampacet.com/Supplier-Code-of-Conduct-July-2023>)