

PURPOSE AND INTRODUCTION

To articulate Strauss Brands' commitment to creating and maintaining a workplace that is free from discrimination and to ensure that all employment-related decisions are based on relevant merits and qualifications

RESPONSIBILITY

This policy applies to all employees, contractors, clients, and suppliers of Strauss Brands, as well as any other persons associated with the company

POLICY STATEMENT

Strauss Brands upholds the principle that all employees and job applicants shall be treated fairly and without discrimination. The company strictly prohibits discrimination on the basis of race, color, religion, sex, age, sexual orientation, national origin, disability, or any other characteristic protected under applicable law.

Equal Opportunity Employment:

- ★ Ensure that recruitment, hiring, training, promotion, and any other aspect of employment happens based on qualifications, performance, skills, and experience without discrimination
- ★ Regularly review and update hiring practices to ensure they are equitable and inclusive

Workplace Environment:

- ★ Foster a workplace culture that respects diversity and promotes equal opportunities for all employees
- ★ Encourage a respectful communication style and behavior that is free from discriminatory language or practices

Discrimination Reporting and Complaint Procedure:

- ★ Establish clear mechanisms for employees to report discrimination or harassment without fear of retaliation
- ★ Ensure that all complaints are taken seriously, and prompt and thorough investigations are conducted

Disciplinary Measures:

- ★ Implement clear consequences for those found in violation of this policy, which may include disciplinary action up to and including termination of employment
- ★ Apply these measures to all levels of personnel, including management and executives

Training and Awareness:

- ★ Provide training to all employees, especially management and those involved in hiring decisions, to recognize, prevent, and handle issues of discrimination
- ★ Educate staff about the importance of diversity and the company's expectations for maintaining a discrimination-free workplace

Accommodation and Accessibility:

- ★ Make reasonable accommodations for employees with disabilities and ensure the workplace is accessible to all employees
- ★ Understand and comply with local laws regarding workplace accommodations and accessibility

Continuous Monitoring:

- ★ Monitor the effectiveness of non-discrimination policies and practices through regular audits and feedback from employees
- ★ Use findings from audits and employee feedback to improve policies and practices

Supplier and Partner Expectations:

- ★ Communicate this non-discrimination policy to all suppliers, contractors, and business partners, and expect their compliance
- ★ Include non-discrimination clauses in contracts and agreements and conduct due diligence to ensure partners' alignment with this policy

Policy Review:

- ★ Review this policy regularly to ensure it remains compliant with all applicable laws and reflects best practices
- ★ Consider any changes in legal requirements, societal expectations, or the needs and concerns of employees

In Conclusion, Strauss Brands believes in the strength of a diverse workforce and is committed to providing a work environment that is inclusive, fair and respectful. Discrimination will not be tolerated under any circumstances.

IMPLEMENTATION AND COMPLIANCE

- ★ Risk Assessments: We will conduct regular human rights impact assessments to identify, prevent, mitigate, and account for how we address our impacts on Dignity and Respect in the Workplace
- ★ Training and Awareness: We will provide training and/or resources to our employees to ensure they understand and can implement this policy effectively
- ★ Grievance Mechanism: Strauss Brands will establish a grievance mechanism for employees and other stakeholders to report human rights concerns without fear of retaliation
- ★ Monitoring and Reporting: Compliance with this policy will be regularly monitored and results will be included in our annual sustainability report
- ★ Continuous Improvement: We are committed to continuously improving our practices to support human rights, seeking dialogue with our stakeholders, and learning from best practices

RESPONSIBILITY AND REVIEW

The ultimate responsibility for this policy lies with the senior leadership of Strauss Brands. This policy will be reviewed annually and updated as needed to ensure relevance and effectiveness in representing our employees' rights and interest

RESOURCES AND REFERENCE MATERIAL

[ETI Base Code Guidance: Disability Inclusion in the Global Supply Chain](#)
[ETI Base Code Guidance: Gender Equality \(A\) Gender and the Base Code](#)
[ETI Base Code Guidance: Gender and Human Rights Due Diligence](#)
[Towards Disability Inclusion: A Handbook for Inclusion of Persons with Disabilities](#)

REVISION DATE	REASON FOR CHANGE	APPROVED BY
10.27.2023	Release	Elsa Kastrul