

PURPOSE AND INTRODUCTION

The purpose of this policy is to reinforce Strauss Brands' commitment to treating all employees with dignity and respect, and to explicitly prohibit any form of harsh or inhumane treatment within any part of the company or its operations

RESPONSIBILITY

This policy applies to all employees, contractors, subcontractors, suppliers, and other business partners associated with Strauss Brands

POLICY STATEMENT

Strauss Brands is committed to maintaining a work environment that promotes dignity and respect for every individual. Harsh or inhumane treatment, including but not limited to physical punishment, mental or emotional coercion, and verbal abuse of employees by managers, supervisors, or peers is strictly prohibited.

Prohibition of Harsh Treatment:

- ★ Explicitly forbid any form of physical abuse or discipline, psychological harassment, verbal abuse, or any other form of intimidation
- ★ Establish zero tolerance for acts of punishment or coercion, whether enacted by staff or by third-party partners

Reporting and Complaints:

- ★ Implement a confidential and anonymous mechanism for employees to report any instance of harsh or inhumane treatment without fear of retaliation
- ★ Ensure all complaints are investigated promptly and thoroughly by a competent and impartial body

Training:

- ★ Provide comprehensive training to all employees, especially those in supervisory roles, on positive management practices and effective, respectful communication methods
- ★ Educate staff on the importance of a harassment-free workplace and on their rights and responsibilities under this policy

Disciplinary Measures:

- ★ Clearly outline the disciplinary measures that will be taken against anyone who violates this policy, which may include reprimand, suspension, or termination of employment
- ★ Ensure disciplinary measures are applied fairly and consistently, regardless of the offender's position within the company

Supportive Measures:

- ★ Offer support services, such as counseling or referral services, to victims of harsh or inhumane treatment
- ★ Encourage employees to support colleagues who may be experiencing such treatment and to report any incidents they witness

Supplier and Contractor Compliance:

- ★ Require suppliers and contractors to adhere to the same standards and practices outlined in this policy
- ★ Include clauses in contracts that bind partners to comply with this policy, and provide for termination of contracts where a breach occurs

Review and Monitoring:

- ★ Regularly review and monitor the implementation of this policy to assess its effectiveness in preventing harsh or inhumane treatment
- ★ Adjust and improve the policy as needed, based on feedback from employees and findings from investigations

PROGRAM NAME

P 009 ★ Prohibition of Harsh and Inhumane Treatment

Accountability and Transparency:

- ★ Hold all levels of management accountable for enforcing this policy and ensure that they lead by example
- ★ Communicate openly with employees about policy updates and the outcomes of any investigations (while respecting the privacy and confidentiality of those involved)

In Conclusion, Strauss Brands is dedicated to ensuring a professional and respectful work environment. Any behavior contrary to this policy will not be tolerated and will be addressed with the utmost seriousness.

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 Prohibition of Harsh and Inhumane Treatment
- ★ 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

- [C029 - Forced Labour Convention, 1930 \(No. 29\)](#)
- [C105 - Abolition of Forced Labour Convention, 1957 \(No. 105\)](#)
- [C190 - Violence and Harassment Convention, 2019 \(No. 190\)](#)

REVISION DATE	REASON FOR CHANGE	APPROVED BY
10.27.2023	Release	Elsa Kastrul