



## **ELEMENT FLEET MANAGEMENT**

### **Human Rights Policy**

As of November 1, 2017, Updated as of February 4, 2019

#### **1. Introduction**

Element Fleet Management Corp., together with its subsidiaries (collectively, “Element”), has long been a company characterized by progressive practices toward our workforce and operating with the highest citizenship and integrity principles in the countries and communities where we do business.

Element is committed to uphold and comply with laws and internationally recognized human rights everywhere we operate. A range of our policies express principles consistent with and/or related to human rights principles, including:

- Code of Business Conduct and Ethics (which references, among many other topics, Health and Safety, Respect for Our Employees, Abusive or Harassing Conduct Prohibited, Privacy, Policy Against Retaliation, and Competition and Fair Dealing);
- Whistleblowing Policy;
- Workplace Violence Policy;
- Equal Employment Opportunity; and
- Accessibility for Persons with Disabilities.

This Policy further defines our commitment.

#### **2. Human Rights**

Element shall support and respect the protection of internationally proclaimed human rights and shall make sure that Element is not complicit in human rights abuses.

#### **3. Workplace Practice**

The necessary conditions for a safe and healthy work environment shall be provided for all Element employees.

#### **4. Forced Labor**

Element shall not engage in or support forced, bonded or compulsory labor, nor require any form of deposit or confiscate identification papers from employees.

#### **5. Labor**

Element employees are free to leave their employment at will. A reasonable notice period is anticipated, as required by law, if applicable. An Element employee under contract employment with Element shall abide by the terms of the Contract.

#### **6. Child Labor**

Child labor is not tolerated and Element will not participate in nor support child labor. The minimum age of employment with Element as a full-time regular employee is 18 years.

## 7. Freedom of Association

Element respects the rights of all employees to join an association or union to represent their interests as employees, to organize and to bargain collectively or individually. An employee's right to refrain from joining an association or union is equally respected.

## 8. Working Hours and Compensation

Element shall comply with applicable laws and agreements on working hours and compensation. Element is committed to ensuring that, at a minimum, all employees earn a minimum wage that enables employees to meet their basic needs.

## 9. Discrimination

Element is committed to fair employment practices and a workplace in which all individuals are treated with dignity and respect. Element does not tolerate discrimination against individuals on the basis of race, colour, gender, religion or other characteristics. Women should receive equal remuneration and working conditions as men for work of equal value. Element expects that all workplace conduct will be professional and free of bias and harassment.

Element is committed to providing Equal Employment Opportunity ("EEO") to all applicants and employees without regard to race, color, religion, genetic information, sex, gender identity, sexual orientation, age, marital status, family status, ancestry, national origin, citizenship, physical or mental disability, veteran status, military obligations or any other characteristic protected by applicable laws.

## 10. Security

Element is committed to developing a safe and secure working environment and will establish security strategies, plans, standards, policies and procedures to identify and manage risks effectively with a focus on preventing security incidents, being prepared to respond to incidents appropriately and investigating and analyze security incidents in order to take appropriate action and continuously improve.

## 11. Governance

Exceptions to this Policy shall be reviewed and approved by the EVP, Chief Human Resources Officer and the EVP, General Counsel. Questions regarding the appropriate interpretations of this Policy shall be directed to Human Resources or Legal. This Policy shall be reviewed on a periodic basis or at the determination of upon change in applicable law, or in applicable business lines, products, processes or practices.

## 12. Document Change History

Version	Date	Changes
001	11/01/2017	Initial document
002	02/04/2019	Periodic review