

Human Rights Policy

Introduction

Element Fleet Management 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 Fleet Management respects human rights in their many manifestations and complies 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 Policies
- Equal Employment Opportunity; and
- Accessibility for Persons with Disabilities.

Believing that primary responsibility for human rights belongs to national governments and is enforced through laws and regulations, Element Fleet Management nevertheless endeavors to assure that in all our business practices we uphold human rights and avoid complicity in human rights abuses. We seek to identify opportunities and risks for human rights impacts within our spheres of influence and activities, with the following aims:

- to play a positive role in sound, ethical business operations
- to further economic growth and development
- to provide employment opportunities that utilize, build, and fairly reward the professional capabilities of our employees
- to partner with suppliers and clients in constructive supply chains
- to seek and have open dialogues with stakeholders, and participate in business, fleet management industry, and community engagement activities; and
- to avoid doing business that in any way encourages, condones, or furthers warfare, human trafficking, and child labor outside the bounds of law or internationally accepted good practice.

This Policy further defines our commitment.

Scope

This policy applies to Element and all its subsidiaries in Canada, Mexico and the United States.

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. Element employees are encouraged to report any suspected violations of this Policy through the Concern Reporting Hotline at 888-744-2277. External stakeholders may report inquires and concerns [by email](#). Element commits to investigating any suspected violations promptly; and no employee, officer or director who in good faith submits a report under this Policy shall suffer retaliation, harassment or an adverse employment consequence as result of such submission.

Workplace Practice

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

Forced Labor

Element aligns with the United Nation's Guiding Principles on Business and Human Rights and has zero tolerance for modern slavery, forced labour and human trafficking. Element shall not engage in or support forced, bonded or compulsory labor, nor require any form of deposit or confiscate identification papers from employees.

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.

Child Labor

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

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.

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.

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.

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.

Administration

These guidelines are administered in partnership between Legal and Human Resources. Exceptions to this Policy shall be reviewed and approved by the EVP, Chief People and Social Impact 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 and may updated at any time.

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