



Ariel Premium Supply, Inc. Labor & Human Rights Policy

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Respect for human rights is an essential value of Ariel's. Ariel makes every effort to respect and promote human rights in accordance with the International Bill of Human Rights, Universal Declaration of Human Rights, International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. Ariel treats all of its employees with respect and dignity and strives to promote diversity in the workplace. Our policies and practices require Ariel to conduct our business with uncompromising integrity and to promote labor and human rights within the company's sphere of influence. We also expect our business partners including independent suppliers and vendors, and the communities in which we operate, to uphold these principles and urge them to adopt similar practices within their own businesses.

Commitments:

Ariel is Committed to the safety and health of all employees and recognizes the need to comply with regulations governing injury, accident prevention and employee safety. Maintaining a safe environment, however, requires the continuous cooperation of all employees.

Applicability of the Policy:

All associates of ARIEL PREMIUM SUPPLY INC. and visitors must make this policy effective.

Responsibility & Governance:

Human Resources

All Managers/supervisors

Health, Safety, and Environmental Officer

The following principles outlined in this document should be viewed as minimum requirements. They are not intended to conflict with or modify terms of any contract with Ariel.

Respect for Labor & Human Rights

Ariel recognizes the importance of maintaining and promoting the fundamental human rights of employees by operating under programs and policies that:

- Promote a workplace free of discrimination and harassment.
- Prohibit child labor, forced labor, and human trafficking.
- Provide fair and equitable wages, benefits, and other conditions of employment in accordance with local laws.
- Provide safe working conditions.

Ariel's Labor & Human Rights Policy aligns with our Code of Business Ethics and Conducts, Anti-Harassment Policy including sexual harassment, Workplace Safety Policy and Environmental Policy covering diversity, environment, health and safety, and employee relations. Ariel is dedicated to the principles that all persons should be treated with respect and is committed to fair, ethical and responsible business practices, as we engage with our employees, consumers, customers, vendors and communities globally. This policy is equally applicable to Ariel's members, directors and vendors, and Ariel reserves the right to preclude such individuals from participation in or doing business with Ariel to the extent they engage in conduct prohibited by this policy.

Prohibited Conducts under this Policy

It is the policy and practice of Ariel to maintain and foster a work environment in which all employees are treated with decency and respect. Accordingly, Ariel has adopted a zero-tolerance policy toward discrimination and all forms of unlawful harassment, including but not limited to sexual harassment. This zero-tolerance policy means that no form of unlawful discriminatory or harassing conduct towards any employee, client, contractor, or other person in our workplace will be tolerated. Ariel is committed to enforcing its policy at all levels within Ariel, and any employee who engages in prohibited discrimination or harassment will be subject to discipline, up to and including immediate discharge from employment for a first offense.

Ariel, in compliance with all applicable federal, state and local anti-discrimination and harassment laws and regulations, enforces this policy in accordance with the following definitions and guidelines:

Employee Health and Safety Issues

Federal law OSHA (Occupational Safety and Health Administration) requires that we keep records of all illnesses and accidents which occur during the workday. The Missouri State Workers' Compensation Act also requires that employer reports any workplace illness or injury, no matter how slight. If employer fails to report an injury, employer may jeopardize employee's right to collect workers' compensation payments as well as health benefits. OSHA also provides for employee's right to know about any health hazards which might be present on the job. Should employee have any questions or concerns, contact

employee's direct supervisor/manager for more information. (Employee Handbook, Reporting Safety Issues 6-1 P.70)

Working Conditions

Ariel will provide a safe, healthy, and secure workplace. We will abide by all applicable laws and regulations for safety and health. Proper sanitation, lighting, ventilation, and fire safety protection will be provided (Employee Handbook, Section VI. Safety 6-1 P.70)

Discrimination

It is a violation of Ariel's policy to discriminate in the provision of employment opportunities, benefits or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, the person's race (including hairstyle/texture), color, national origin, age, religion, disability status, sex, sexual orientation, gender identity or expression, genetic information or marital status.

Discrimination of this kind may also be strictly prohibited by a variety of federal, state and local laws, including Title VII of the Civil Rights Act of 1964, the Age Discrimination Act of 1967 and the Americans with Disabilities Act of 1990. This policy is intended to comply with the prohibitions stated in these anti-discrimination laws.

Discrimination in violation of this policy will be subject to disciplinary measures up to and including termination.

Harassment

Ariel prohibits harassment of any kind, including sexual harassment, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy, harassment is any verbal or physical conduct designed to threaten, intimidate or coerce an employee, co-worker, or any person working for or on behalf of Ariel.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal harassment includes comments that are offensive or unwelcome regarding a person's national origin, race, color, religion, age, sex, sexual orientation, pregnancy, appearance, disability, gender identity or expression, marital status or other protected status, including epithets, slurs and negative stereotyping.
- Nonverbal harassment includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of national origin, race, color, religion, age, gender, sexual orientation, pregnancy, appearance, disability, sexual identity, marital status or other protected status.

Sexual Harassment

Sexual harassment is a form of unlawful employment discrimination under Title VII of the Civil Rights Act of 1964 and is prohibited under Ariel's anti-harassment policy. According to the Equal Employment Opportunity Commission (EEOC), sexual harassment is defined as "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature ... when ... submission to or rejection of such conduct is used as the basis for employment decisions ... or such conduct has the purpose or effect of ... creating an intimidating, hostile or offensive working environment."

Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature:

- Is made explicitly or implicitly a term or condition of employment.
- Is used as a basis for an employment decision.
- Unreasonably interferes with an employee's work performance or creates an intimidating, hostile or otherwise offensive environment.

Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal sexual harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or "kidding" that is oriented toward a prohibitive form of harassment, including that which is sexual in nature and unwelcome.
- Nonverbal sexual harassment includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters, notes, facsimiles, e-mails, photos, text messages, tweets and Internet postings; or other forms of communication that are sexual in nature and offensive.
- Physical sexual harassment includes unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, and forced sexual intercourse or assault.

Courteous, mutually respectful, pleasant, noncoercive interactions between employees that are appropriate in the workplace and acceptable to and welcomed by both parties are not considered to be harassment, including sexual harassment.

Consensual Romantic or Sexual Relationships

Ariel strongly discourages romantic or sexual relationships between a manager or other supervisory employee and an employee who reports directly or indirectly to that person, because such relationships tend to create compromising conflicts of interest or the appearance of such conflicts. In addition, such a relationship may give rise to the perception by others that there is favoritism or bias in employment decisions affecting the staff employee.

Moreover, given the uneven balance of power within such relationships, consent by the staff member is suspect and may be viewed by others, or at a later date by the staff member, as having been given as the result of coercion or intimidation. The atmosphere created by such appearances of bias, favoritism, intimidation, coercion or exploitation undermines the spirit of trust and mutual respect that is essential to a healthy work environment. If there is such a relationship, the parties need to be aware that one or both may be moved to a different department or other actions may be taken.

If any employee of Ariel enters into a consensual relationship that is romantic or sexual in nature with an employee who reports directly or indirectly to that employee, or if one of the parties is in a supervisory capacity in the same department in which the other party works, the parties must notify the HR Manager or other appropriate corporate officer. Because of potential issues regarding quid pro quo harassment, Ariel has made reporting mandatory. This requirement does not apply to employees who do not work in the same department or to parties where neither one supervises or otherwise manages responsibilities over the other.

Once the relationship is made known to Ariel, the company will review the situation with human resources in light of all the facts (reporting relationship between the parties, effect on co-workers, job titles of the parties, etc.) and will determine whether one or both parties need to be moved to another job or department. If it is determined that one party must be moved, and there are jobs in other departments available for both, the parties may decide who will be the one to apply for a new position. If the parties cannot amicably come to a decision, or the party is not chosen for the position to which he or she applied, the HR Manager and senior management will decide which party will be moved. That decision will be based on which move will be least disruptive to the organization as a whole. If no other jobs are available for either party, the parties will be given the option of terminating their relationship or resigning.

Every employee should be aware that all managers and supervisors are absolutely prohibited from making any decision regarding job assignment or reassignment, performance evaluation, compensation, promotion or demotion, termination or commencement of employment, or any other decision involving any tangible employment action, based in whole or in any part on any person's exposure to, submission to, acquiescence in, or complaint about, sexual harassment or any other form of unlawful harassment or discrimination.

Retaliation

Ariel recognizes that there are times when the need arises for employees to express concerns or complaints. Any Ariel employee may bring the concern, complain or report directly to his/her supervisor/manager, the HR, or any member of the Management Team with whom he/she feels comfortable bringing such a complaint. Similarly, if employee witnessed illegal discrimination, including sexual or other forms of unlawful harassment, he/she is requested and encouraged to report this to one of the individuals listed above.

No Ariel manager or supervisor is authorized, or permitted, to retaliate or to take any adverse employment action whatsoever against anyone for reporting unlawful harassment, or for opposing any other discriminatory practice in the workplace.

No reprisal, retaliation, or other adverse action will be taken against an employee for making a complaint or report of discrimination or harassment or for assisting in the investigation of any such complaint or report. Any suspected retaliation or intimidation should be reported immediately to the HR or any member of the Management Team with whom he/she feels comfortable bringing such a complaint.

All complaints will be investigated promptly and, to the extent possible, with regard for confidentiality. Ariel would like to ensure that associates receive a fair and unbiased review of workplace concern or complaint. The Management Team shall have final authority to resolve any disputes regarding the implementation of this Complaint Procedure, including determination of the appropriate decision makers.

If the investigation confirms conduct contrary to this policy has occurred, Ariel will take immediate, appropriate, corrective action, including discipline, up to and including immediate termination.

No hardship, loss, benefit or penalty may be imposed on an employee in response to:

- Filing or responding to a bona fide complaint of discrimination or harassment.
- Appearing as a witness in the investigation of a complaint.
- Serving as an investigator of a complaint.

Lodging a bona fide complaint will in no way be used against the employee or have an adverse impact on the individual's employment status. However, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation.

Any person who is found to have violated this aspect of the policy will be subject to discipline up to and including termination of employment.

- Offensive and unwelcome sexual invitations, whether or not the employee submits to the invitation, and particularly when a spoken or implied *quid pro quo* for sexual favors is a benefit of employment or continued employment;
- Offensive and unwelcome conduct of a sexual nature, including sexually-graphic spoken comments; offensive comments transmitted by e-mail or another messaging system; offensive or suggestive images or graphics whether physically present in the workplace or accessed over the Internet; or the possession of or use of sexually suggestive objects; and
- Offensive and unwelcome physical contact of a sexual nature, including the touching of another's body; the touching or display of one's own body, or any similar contact.

Forced Labor and Human Trafficking

Ariel supports the elimination of all forms of forced, bonded or involuntary prison labor and will not use slave or involuntary labor, whether bonded, prison, military, compulsory or indentured

labor, including debt servitude or human trafficking with respect to any aspect of its operations. All employment is voluntary. Ariel is committed to acting ethically and with integrity in all our business dealings and relationships. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our organization consistent with our obligations under various countries' laws.

Violation of Child Labor Laws

Ariel abides by local child labor laws and do not use or condone child labor in any circumstance. Ariel supports the elimination of exploitive child labor.

Unsafe/Disruptive Conditions in the Workplace

Ariel's policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations as well as internal requirements. Ariel works to provide and maintain a safe, healthy and productive workplace, in consultation with our employees and professional experts, by addressing and remediating identified risks of accidents, injury and health impacts. Ariel prohibits violence, harassment, intimidation and other unsafe or disruptive conditions due to internal or external threats.

In compliance of Working Hours, Wages, and Benefits Laws

Ariel complies with local wage laws and compensates our employees with wages and benefits that meet or exceed the legally required minimum and competitively relative to the industry and local labor market. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

Disruptive Conditions of Diversity and Inclusion

Ariel is committed to be a high-performing organization built on the foundation of a diverse and inclusive workforce, with individuals and teams working to blend a wide range of talents, preferences and perspectives in pursuit of shared purposes. Our diversity and inclusion efforts with our employees expand globally through a multi-pronged approach focused on recruitment, development and engagement. Employees are expected to be open to dialogue and tolerant of others' differences and participate in open and honest communication as well as assuming the positive intent of others.

Communication, Training and Reporting Procedures

We strive to create workplaces in which open and honest communication among all employees is valued and respected. Ariel is committed to complying with applicable labor and employment laws wherever we operate. In addition, we work to achieve full employee engagement as the foundation of our mutual success; strive to create a culture that champions respect and inclusion; offer competitive wages and benefits; and implement clear health and safety practices.

All employees are expected to comply with this Human Rights and Labor Policy. In furtherance of this, managers and employees receive written policies and/or training on a number of human rights and labor related issues which may include equal employment opportunity, anti-harassment, Code of Business Conduct compliance etc.

Any employee who believes a conflict exists or has come to exist between the language of this policy and the laws, customs and practices of the place where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy should raise those questions and concerns with his or her direct manager, the Management Team, Human Resources or through any available reporting features in Ariel.

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The identity of the complainant is usually revealed to the parties involved during the investigation, and the HR Manager will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR department.

Environment

We abide by all applicable environmental laws and regulations. We will manage our environmental footprint to minimize the adverse impact on the environment. We will manage our energy, water, and waste systems for maximum efficiency and minimal adverse impact on the environment.

Key performance indicators to measure effectiveness of steps being taken

Ariel performs an **annual review** of its risk assessment and policies.

This Standard Labor and Human Rights Policy is **publicly** accessible on Ariel's public website. www.arielpremium.com

This Standards Labor and Human Right policy is **reviewed annually**.

Next review on 02/24/2023

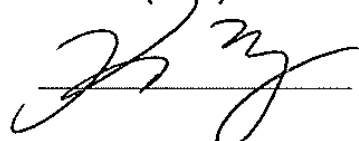
Human Resources

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