

ELEVATE Employment Policy

At ELEVATE, we pride ourselves on our high standards for ethical conduct and professionalism in dealing with each other, our clients, factories, workers and our communities. Integrity is at the core of everything we do—including how we operate internally.

This policy applies to all ELEVATE employees. However, they are not meant to describe the full scope of ELEVATE human resource policies or practices. More detailed statements of policies, procedures and practices are included in region-specific ELEVATE Handbooks. Employees are required to comply with all ELEVATE policies, procedures and practices at all times and are responsible for consulting their management if they have any questions.

Our goal is to ensure full compliance with these principles by ELEVATE managers and employees.

Non-Discrimination and anti-harassment

ELEVATE is an equal opportunity employer. All employment decisions based on merit, qualifications, and abilities. ELEVATE does not discriminate in employment practices because of race, color, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, disability or veteran status, or any other basis protected by the legislation in the countries we operate in.

ELEVATE actively works to maintain a diverse and inclusive work environment. ELEVATE will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Grievance mechanisms and remediation

ELEVATE places importance on the provision of effective grievance mechanisms and remedy for employees, individuals and communities adversely impacted by its operations. ELEVATE is committed to making sure workers can communicate without fear of retaliation, intimidation, harassment or discrimination.

Employees with concerns or grievances relating to the workplace are encouraged to bring these issues to the attention of their manager, the Global HR Director, the Senior Vice President of their business stream or through ELEVATE's third-party hotline, [Ethics Point](#). All concerns reported in good faith will be treated confidentially and reviewed. Anyone who attempts to retaliate against the employee for speaking up may face disciplinary action up to and including termination of employment. Should a matter be reported in malicious or vexatious manner, disciplinary action may be taken – including termination of employment.

Respect and dignity

ELEVATE will treat all employees with respect and dignity and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment.

There is no forced, bonded or involuntary prison labour, employees are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.

Forced or involuntary labor

ELEVATE will not use forced or involuntary labor of any type (e.g., forced, bonded, indentured or involuntary prison labor); employment is voluntary.

Child labor

ELEVATE will not use child labor. The term "child" refers to any employed person under the age of 16, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. We support the use of legitimate workplace apprenticeship, internship and other similar programs that comply with all laws and regulations applicable to such programs.

Freedom of association

ELEVATE provides the freedom for its employees to establish a formal employee organization or representative structure in accordance with local law. The company will not discriminate based on an employee's decision to join in an employee organization or representative structure.

Wages and benefits

ELEVATE will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates, nonexempt or exemption classification and other elements of compensation, and provide legally mandated benefits.

All employees shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

Laws, including regulations and other legal requirements

ELEVATE will comply with all applicable laws, regulations and other legal requirements in all locations where it conducts business.

Non-disclosure and confidentiality

The protection of confidential business information and trade secrets is vital to the interests and success of ELEVATE. Such confidential information includes, but is not limited to, the following examples:

- Compensation and benefits data;
- Financial information;
- Marketing strategies;
- Pending projects and proposals;
- Proprietary production processes;
- Personnel/Payroll records; and
- Conversations regarding confidential business information between any persons associated with the company.

Employees who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

Additional information about ELEVATE's operational expectations for confidentiality and non-disclosure are defined within the company's Code of Conduct. Employees should refer to the Code of Conduct for more information.

Conflict of interest

ELEVATE employees or any of their relatives may not have any financial interest, direct or indirect, in any business which competes with ELEVATE or with which ELEVATE has business dealings. Exceptions will be reviewed and approved by the Vice President of Global Quality and Integrity.

Anti-bribery

ELEVATE employees are never permitted to offer or accept bribes or commissions nor participate in or facilitate corrupt activities of any kind. Employees found to be soliciting or accepting any commission, payment, gift, service, favor or any other benefit related to their work from a client will be in breach of their contract under terms of gross misconduct. Employees should refer to ELEVATE's Code of Ethics for additional information.

Health and safety

ELEVATE will provide its employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Employees should refer to ELEVATE's Occupational Health and Safety policy for more information.

Approved

Approved by Ian Spaulding, CEO, ELEVATE – 5 March 2018

Additional information

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