

DJE HOLDINGS HUMAN RIGHTS POLICY

Revised: **March 2020 (reviewed annually)**
Owner: **Managing Director, Global Engagement and Corporate Responsibility**
Global Human Resources
Global Compliance
Approver: **Global Human Rights**
Chief Administrative Officer
Global Chief of Staff

I. Overview

The key tenets of DJE Holdings¹ business are reputation, leadership, and transparency. Respecting human rights, therefore, is a fundamental part of how we do business.

This policy reflects DJE Holdings' commitment to uphold human rights in every facet of our business, avoid directly or indirectly infringing on the human rights of others, and address negative impacts on human rights if they occur.

As a signatory of the United Nations Global Compact, DJE Holdings embraces our responsibilities as a business and supports internationally accepted principles regarding human rights, labor standards, and anti-corruption, including the United Nations Declaration of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. DJE Holdings seeks to operate our business in a manner that upholds these principles.

II. Materiality

While DJE Holdings, as a professional services firm with a modest sized global footprint, may have low risk of impacting a number of human rights issues, we have established a comprehensive policy approach that guides our business principles and our commitment to deliver on societal and operational responsibilities.

III. Application of Law

DJE Holdings will comply with applicable laws adopted in every country and locale where we operate.

Where local law is more or less strict than this policy, DJE Holdings will follow the stricter law or policy.

In situations where local law is silent on human rights, this policy will still apply.

¹ DJE Holdings includes Edelman, Zeno Group, Assembly, BioScience Communications, Edelman Intelligence, Edible, First & 42nd, Revere, Salutm, United Entertainment Group, and First at EDIFI

IV. People

DJE Holdings is a professional services firm, and our people are at the heart of our success. Ensuring fair and equal human rights for all our employees is at the center of our approach to business.

Equal Opportunity & Nondiscrimination

Our business thrives on diversity and inclusion. Diversity and inclusion are essential to provide our clients with myriad ideas and insights to effectively reach different global audiences.

DJE Holdings does not discriminate or tolerate discrimination based on age, sex, gender, gender identity, gender expression, race, color, ethnicity, national origin, ancestry, sexual orientation, religion, political affiliation, marital status, pregnancy, disability, genetic information, personal appearance, veteran status, or any other protected status or condition. Employment decisions are based solely on a candidate's ability to perform the job.

Our mission is to provide each employee with equal respect, dignity, and fair treatment. DJE Holdings strives to celebrate our diversity and does not tolerate harassment, intimidation, or degrading treatment.

Fair Pay & Working Conditions

DJE Holdings pays wages that meet or exceed local laws and aims to pay competitive wages that meet or exceed industry standards.

DJE Holdings employees will not be required to work more hours than allowed by applicable local laws and regulations.

Pay deductions will never be used as a disciplinary action.

Health & Safety

DJE Holdings regards safety and health as an essential element of our working environment and we work to provide a safe, clean, and healthy working environment for our employees. This includes taking precautions to minimize workplace hazards that may cause accidents or harm employee health.

Child Labor

DJE Holdings will not employ anyone under 15 years old, except as otherwise allowed under applicable laws and regulations and acceptable under societal and cultural norms (e.g., for use of minors in certain age-appropriate product promotion activities). Where local minimum age law stipulates a higher age for work or mandatory schooling, local law would apply.

Forced or Bonded Labor

DJE Holdings considers the use of forced, compulsory, or bonded labor unacceptable and will only employ people of their own free will.

Freedom of Association & the Right to Collective Bargaining

DJE Holdings employees have the right to organize and engage in collective bargaining without fear of intimidation, reprisal, or harassment. In countries that restrict this right, DJE Holdings may choose to support similar means of independent and free association and collective representation as allowed by applicable law.

Bribery

Integrity and trust are at the heart of our business, and DJE Holdings does not pay, solicit, or accept bribes. This includes the prohibition of providing payments or anything of value directly or indirectly to any government official, business partner, or individual for purposes of obtaining business or otherwise influencing their decisions in violation of applicable anti-corruption regulations and standards.

Compliance & Political Activities

DJE Holdings complies with all applicable laws and regulations of the countries in which we operate. DJE Holdings employees are free to participate in political activities of their choice as allowed by applicable law. DJE Holdings does not, however, participate in party politics or make donations of any kind to political parties.

Security Arrangements

DJE Holdings provides a safe and secure working environment for our employees and business partners. In some countries where we operate, local governments may be unable or unwilling to provide adequate security. In such cases, DJE Holdings will consider what additional security measures may be necessary to observe DJE Holdings' Human Rights Policy and international human rights norms.

V. Environment

We recognize that humans have a right to a healthy environment. We respect the environment we live and work in and embrace our responsibility to manage our environmental impact in a sustainable manner.

VI. Suppliers

We expect our suppliers to respect our Human Rights Policy and support our effort in making human rights a way of doing business.

DJE Holdings expects our suppliers to understand and comply with our [Code of Ethics for Suppliers and Service Providers](#), which communicates our expectations regarding human rights and other provisions that apply to our third-party service providers. Failure to comply with the provisions of this code can result in exclusion of a third-party service provider from doing business with DJE Holdings.

VII. Communities

Being accepted as a respected partner and member of each community where we live and work is an important driver of our success as a business. Respecting our communities and embracing our role as a positive member of our communities are key to our approach to human rights.

VIII. Services

We embrace our responsibility to manage our service in a manner that respects human rights and the communities in which we act.

Consumer Protection

DJE Holdings upholds quality standards to ensure that our services appropriately consider the interests and needs of our clients, consumers, and industry expectations. We are also committed to marketing and communicating responsibly in a manner that reflects the values and principles reflected in [Edelman's Code of Ethics and Business Conduct](#) and our [Day-to-Day Situation Guide](#).

Clients

We expect our clients to respect our Human Rights Policy and refrain from acting in a way that violates the human rights of their employees, communities, or others with which they interact. DJE Holdings reserves the right to refuse to work with clients, sectors, or industries that may jeopardize or violate the human rights of anyone. These excluded parties include but are not limited to those listed in the Economic Sanctions Compliance Policy.

IX. Governance

DJE Holdings' Human Rights Policy will be managed by our Edelman Global Citizenship Advisory Group, which is made up of key department and regional representatives and internal human rights experts. The advisory group will review DJE Holdings' Human Rights Policy and practices on a yearly basis.

Reporting Violations & Anti-Retaliation Policy

DJE Holdings encourages employees, clients, suppliers, business partners, and other third parties to report suspected violations or instances where a proposed action creates a risk of violation of the Human Rights Policy or human rights laws. Reports may be made to the Global Citizenship Advisory Group. Additionally, employees may report to Human Resources, their manager, or the Edelman "Listen Line". DJE Holdings will not retaliate against or otherwise punish those who voice their concerns in good faith.

Corrective Action

DJE Holdings will take all potential violations of the Human Rights Policy seriously and take appropriate action to correct or alleviate the negative impacts on human rights. Action may include but is not limited to educating the violating party on DJE Holdings' policies, instituting appropriate measures to prevent future violations, and disciplinary actions against the violating party.