

DJE HOLDINGS HUMAN RIGHTS POLICY

Revised: **April 2025**
Owner: **Managing Director, Global Engagement and Corporate Responsibility**
Chief People & Culture Officer
Global Compliance and Ethics Officer
Approver: **Executive Committee**

I. Overview

This policy applies to all employees, officers, and directors throughout Daniel J. Edelman Holdings, Inc. (DJEH).¹

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

This policy reflects DJEH's 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.

Edelman (the largest company within DJEH) is a signatory of the United Nations Global Compact (UNGC). As such, DJEH 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. DJEH seeks to operate our business in a manner that upholds these principles.

Some of Edelman's objectives related to human rights:

- Continue to maintain workforce diversity in the U.S. consistent with applicable law.
- Ensure full employee participation in DEIB Essentials learning moment and expand DEIB-focused learning moments across the company.
- Maintain Employee Network Groups for all employees around the globe.

II. Application of Law

DJEH 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, DJEH will follow the stricter law or policy. In situations where local law is silent on human rights, this policy will still apply.

¹ Daniel J. Edelman Holdings, Inc. and its affiliated companies worldwide (collectively referred to as "DJE Holdings" or "DJEH" in this document). A list of DJEH affiliated companies can be found here: [Home | DJE Holdings](#)

III. People

DJEH 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

Diversity, equity, inclusion, and belonging (DEIB) help to transform our colleagues, our companies, our clients, and our communities and propel us forward. DJEH strives to celebrate and recognize all types of diversity, fostering an equitable and inclusive workplace culture. Diversity, equity, inclusion, and belonging are essential to provide our clients with myriad ideas and insights to effectively reach different global audiences.

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

DJEH embraces and values diversity and does not tolerate harassment, intimidation, or degrading treatment. Each day, our mission is to provide each employee with equal respect, dignity, and fair treatment.

Fair Pay & Working Conditions

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

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

Health & Safety

DJEH 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 & Child Protection

DJEH 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

DJEH considers the use of forced, compulsory, or bonded labor unacceptable and will only employ people of their own free will. We also seek to fully comply, at a minimum, with relevant labor and human rights regulations in each country in which DJEH operated, including meeting the reporting requirements of the [UK Modern Slavery Act](#).

Freedom of Association & the Right to Collective Bargaining

DJEH employees have the right to organize and engage in collective bargaining without fear of intimidation, reprisal, or harassment. In countries that restrict this right, DJEH supports 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 DJEH 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 improperly obtaining business or otherwise influencing their decisions in violation of applicable anti-corruption regulations and standards.

Extortion

DJEH conducts our business in a fair manner and does not participate in any extortionary activities, nor do we tolerate employees or suppliers committing extortion for any reason.

Compliance & Political Activities

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

Security Arrangements

DJEH 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, DJEH will consider what additional security measures may be necessary to observe DJEH's Human Rights Policy and international human rights norms.

IV. 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.

DJEH's environmental commitments can be found in our [Environmental Policy](#).

V. Suppliers

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

DJEH 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 the exclusion of a third-party service provider from doing business with DJEH.

DJEH's additional supplier expectations can be found in our Sustainable Procurement Policy and our and DJEH Supplier Environmental policy.

VI. 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.

VII. 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

DJEH 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 DJEH's Code of 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, suppliers, or others with which they interact.

DJEH reserves the right to refuse to work with clients, sectors, or industries that may jeopardize or violate the human rights of anyone.

VIII. Governance

DJEH's Human Rights Policy is managed by our Global Citizenship, Global Human Resources, and Global Legal and Compliance functions.

Reporting Violations & Anti-Retaliation Policy

- DJEH 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 Ethics and Compliance Officer, Chief Human Resources Officer, or Managing Director, Global Engagement and Corporate Responsibility. Additionally, employees may report to their manager or for anonymous reporting use [LISTEN LINE](#) access code **DJE**.

DJEH will not retaliate against or otherwise punish those who voice their concerns in good faith.

Corrective Action

DJEH 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 DJEH's policies, instituting appropriate measures to prevent future violations, and disciplinary actions against the violating party.