



Human Rights Policy

Policy Statement

The Fedcap Group has a longstanding commitment to promoting human rights, diversity, equity and inclusion in the workplace and has implemented policies and procedures to support and uphold human rights, equal employment opportunity and compliance with affirmative action requirements.

We are fully committed to meeting the implementation requirements of the UN Guiding Principles for Business and Human Rights. We strive to respect and promote human rights in our relationships with our employees, suppliers, partners and other stakeholders. Our aim is to ensure human rights are protected among our workforce and in the communities in which we serve and operate.

This Human Rights Policy applies to The Fedcap Group, the entities that we own, and the facilities that we manage. The Fedcap Group also expects suppliers and partners to uphold these principles and urges them to adopt similar policies within their own businesses.

This Human Rights Policy is overseen by The Fedcap Group's Chief Executive Officer and President, General Counsel and Chief Compliance Officer.

Human Trafficking

We fully prohibit human trafficking for any purpose, whether forced labor, sexual slavery, or commercial sexual exploitation for the trafficker or others.

Forced Labor

We fully prohibit the use of all forms of forced labor for any purpose, whether through the use of force, fraud, or coercion. This includes prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

Child Labor

We prohibit the employment of minors under the age of 14, restrict the hours and types of work that can be performed by minors under 16, and prohibit the employment of minors under the age of 18 in any hazardous occupation.

Freedom of Association

We respect our employees' rights to collective bargaining under all federal, state and local laws.

We seek to compensate employees relative to the relevant industry, local labor market and available resources. We work in good faith to comply with applicable wage, work hours, overtime and benefits laws.

Equal Remuneration

We work in good faith to ensure that work of a similar nature or value is equally remunerated.

Discrimination

It is our policy to provide equal employment opportunities to all employees and applicants without regard to unlawful considerations of religion, creed, race, color, sex, sexual orientation, [genetic information], national origin, age, gender, gender identity or expression, disability, marital status, citizenship status, domestic partnership, military status or status as a veteran, or any other protected characteristic in accordance with applicable federal, state or local law. This policy applies to all aspects of employment, including, but not limited to, hiring, job assignment, compensation, promotion, benefits, training, discipline, and termination. The Fedcap Group expects all employees to act in accordance with our equal employment opportunity policy and to take all steps necessary to maintain a workplace free from unlawful discrimination, harassment and retaliation.

Guidance and Reporting for Employees

There are several ways in which employees, Board members and volunteers can speak up and report concerns under this policy. Individuals may speak directly with their supervisor, or with members of the Human Resources or Legal Department.

Individuals may also send an email to the Corporate Compliance Officer at corporatecompliance@fedcap.org and concerns may be raised via the Compliance Hotline: 1-866-384-4277; TTY: 1-866-294-9572.

Document Control

This policy will be reviewed at least annually to respond to any changes. The Fedcap Group reserves the right to amend this policy at any time.