

July 01, 2024

**POLICY STATEMENT REGARDING
Child Labor, Forced Labor & Human Trafficking**

1 PURPOSE

1.1 At BioSpectra Inc., we are committed to upholding the highest standards of ethical conduct in all aspects of our operations. As such, we unequivocally condemn the use of child labor and forced labor in any form. We recognize that child and forced labor are serious violations of human rights and are detrimental to the well-being of individuals and communities. Therefore, we affirm the following policy:

2 SCOPE

2.1 This policy applies to our entire organization and those we do business or partner with including suppliers, vendors and contractors.

3 IMPLEMENTATIONS

3.1 BioSpectra has established a mechanism to report child labor and/or forced labor issues and inclusion of:

- 3.1.1 Confidentiality guarantee; our whistleblower program, further information regarding this can be found in the employee handbook, Section 1: Diversity.
- 3.1.2 Non-retaliation guarantee.
- 3.1.3 Dedicated and anonymous reporting channels to Human Resources and/or Regulator Compliance Departments (EHS and Security).

3.2 BioSpectra has an established a Whistle-blower policy that provides employees with a process to register complaints, ensures there will be a fair and objective investigation and there will be no retaliation for making a complaint. BioSpectra has implemented an electronic platform, called ReportIT, which provides employees with the opportunity to anonymously report violations of child labor, forced labor, and human trafficking.. Moreover, there are repercussions to any necessary party that has gone against company policy as stated in our employee handbook, Section 1: Diversity.

3.3 Refer to our Policy Statement on the employment and protection of Minors. It is the policy of BioSpectra Inc., not to employ child labor nor use of any forced labor or engage in any form whatsoever of human trafficking. BioSpectra expressly prohibits the hiring of employees under the age of 18 and does not allow children to work at any level of the organization. Outlined in the BioSpectra Employee Handbook: Section 2 - Employment.



3.4 The company further prohibits the use of child labor in any part of its supply chain as detailed in our “Supplier Code of Ethics”. All employees, contractors, and suppliers are expected to comply with this policy and ensure that child labor is not condoned in the workplace, directly or indirectly.

- 3.4.1 BioSpectra adheres to the Federal Fair Labor Standards Act (FLSA) as well as all State child labor laws for the Commonwealth of Pennsylvania.
- 3.4.2 As an incorporated entity in the Commonwealth of Pennsylvania, BioSpectra adheres rigorously to all State laws and guidances of the Pennsylvania Dept. of Labor.
- 3.4.3 Similarly, BioSpectra adheres to all Federal Guidance and Laws pertaining to a company with over 50 employees.
- 3.4.4 Our employee hiring practices are documented in our Employee Handbook, Section 2.

3.5 Therefore, it is the responsibility of each and every employee to uphold the principles and policies of this document in every area of service and employment within the company.

4 PROHIBITION OF CHILD LABOR

4.1 We strictly prohibit the use of child labor in any part of our operations. Children under the legal working age in their respective countries shall not be employed by our company or our suppliers.

5 PROHIBITION OF FORCED LABOR

5.1 We prohibit any form of forced or compulsory labor. This includes situations where individuals are coerced to work through threats, physical or psychological abuse, or any other means of coercion.

6 SUPPLIER RESPONSIBILITY

6.1 We expect our suppliers and business partners to share our commitment to eliminating child and forced labor from their own operations. We will work collaboratively with suppliers to ensure compliance with these standards.

7 VERIFICATION AND MONITORING

7.1 We will implement rigorous processes to verify and monitor compliance with our policy against child and forced labor. This may include audits, assessments, and ongoing dialogue with suppliers and stakeholders.

8 TRAINING AND AWARENESS

8.1 We will provide training and awareness programs to our employees and suppliers to ensure understanding of our policy, the importance of ethical labor practices, and the identification and reporting of any violations.



9 REMEDIATION AND ACCOUNTABILITY

9.1 In the event that violations of this policy are identified, we will take immediate action to address the situation, including collaborating with suppliers to implement corrective actions and providing remedies to affected individuals.

10 TRANSPARENCY AND REPORTING

10.1 We are committed to transparency in our efforts to eliminate child and forced labor. We will report periodically on our progress, challenges, and outcomes related to this policy.

11 CONTINUOUS IMPROVEMENTS

11.1 We will continuously review and improve our policies, practices, and procedures regarding child labor, exploitation, and human trafficking to ensure alignment with internationally recognized principles and best practices.

12 POLICY REVIEW

12.1 This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.

Policy Approval: Authorized person name: Paul DiMarco - Title: Sr. Vice President

A handwritten signature in black ink, appearing to read "Paul DiMarco", with a stylized flourish at the end.

**Paul DiMarco | Senior Vice President
Commercial Operations**

Paul.dimarco@biospectra.us

www.biospectra.us