



PHOENIX CABLES INC.

Human Rights Policy:

1. Purpose:

- a. The purpose of this policy is to express Phoenix Cables Inc's active and continuous determination to meet its responsibility to respect and support internationally recognized human rights standards in accordance with the UN Global Compact and the Universal Declaration of Human Rights.
- b. Human rights are the fundamental rights, freedoms, and standards of treatment to which all people are entitled. Respecting human rights and conducting business to the highest ethical standards is a core value at the Company and embedded in everything that we do.

2. Community and Stakeholder Engagement:

- a. We recognize that we are part of the communities in which we operate. We engage with communities and stakeholders on human rights issues that are related to our business and that are important to such communities and stakeholders, including, but not limited to, land use, environmental impacts, and civil impacts such as transportation and health. Our aim is to ensure through an open dialogue that we are listening to, learning from, and considering the views of the communities we operate in as we conduct our business.

3. Diversity and Inclusion:

- a. We value and advance diversity and inclusion in our workplaces. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain and establish workplaces that are free from discrimination or harassment based on race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is an individual's qualifications, performance, skills and experience.

- b. We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment and discrimination are not tolerated in the workplace or in any work-related circumstance outside the workplace.

4. Health and Safety:

- a. The safety and health of all our employees is of paramount importance to the Company. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. We work with our employees to provide and maintain a safe, healthy and productive workplace by addressing and remediating identified risks of accidents, injury and health impacts.
- b. The Company intends to promote respect for ethical conduct and human rights with its third parties such as contractors, suppliers and other business partners. We believe that working with partners that share in our human rights commitment is critical to the success of our business operations and brand integrity.

5. Forced labor, slavery, child labor and human trafficking:

- a. We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, child labor, modern forms of slavery and any form of human trafficking.
- b. We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

6. Work Hours, Wages and Benefits:

- a. We compensate our employees competitively compared to the industry in which the Company operates as well as the local labor market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

7. Land Rights and Water Resources:

- a. We respect the human need for sustainable water supplies, safe drinking water, and the importance of water for both ecosystems and communities. We address this by adhering to proper water regulatory management in accordance with applicable laws and regulations.

8. Guidance and Reporting:

a. We strive to create workplaces in which open and honest communications among all employees are valued and respected. The Company is committed to complying with applicable labor and employment laws wherever we operate.

i. Any employee who believes a conflict arises in the language of this policy and the applicable laws, customs and practices of the place where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy, should raise those questions and concerns with his or her supervisor, the Human Resources Department, and/or the Legal Department.

ii. Employees can also report suspected policy violations directly to the General Manager.

b. No reprisal or retaliatory action will be taken against any employee of the Company for raising concerns under this policy. The Company will investigate, address and respond to the concerns of reporting employees and where applicable, will take appropriate corrective action in response to any violation.

