

Human Rights Policy

Description and authorization process

Document name: Human Rights Policy

Document ID: 49

Document owner: Steve MacGuidwin - Vice President, Global Compliance Officer

Approved by: Steve MacGuidwin - Vice President, Global Compliance Officer

Type: Policy

Issued by: Legal

Region: Global

Version history:

Version	Effective date	Description
V1.5	March 07, 2025	Formatting changed to new template and ID number. Previous ID number was 020.03. Added "We offer reasonable employee accommodations based on disability, religion, and other areas as required by local laws in the policy statements".
V1.4	Jun 29, 2020	Added detail to the equal opportunity provision
V1.3	Oct 01, 2019	Enhanced anti-human trafficking provisions
V1.2	Apr 25, 2018	Added language re: breach of policy
V1.1	Mar 23, 2018	Updated to reflect "Vertiv Policies and Procedures
V1.0	Mar 01, 2018	Initial release



Table of Contents

1. Purpose.....	3
2. Scope.....	3
3. Definitions	3
4. Forms.....	3
5. Roles and responsibilities.....	3
6. Policy statements	3
7. Exceptions	5
8. Reviews	5

1. Purpose

- The purpose of this policy is:
 - To document Vertiv's commitment to respect human rights in all its operations. All applicable wage and hour, anti-discrimination, child labor, anti-slavery, and other laws protecting human rights are adopted by reference.

2. Scope

- This policy applies to Vertiv globally or the Region noted above including all its local units, subsidiaries, affiliates, employees, and all third parties (i.e., consultants, contractors, partners, vendors) performing business on behalf of Vertiv or its entities.

3. Definitions

- United Nations Global Compact. A strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labor, environment, and anti-corruption.
- Universal Declaration of Human Rights. The declaration adopted by the United Nations General Assembly on December 10, 1948, comprising 30 articles that outline a comprehensive perspective of human rights.

4. Forms

- Not applicable.

5. Roles and responsibilities

- Business Units and Functional Departments: The leaders of each Vertiv business unit and functional department have overall responsibility for assuring compliance with this policy.

6. Policy statements

- Vertiv respects the dignity and human rights of individuals and requires that our suppliers and business partners do the same. Vertiv fully supports and seeks to adhere to the principles of both the United Nations Global Compact and Universal Declaration of Human Rights.
- Employees: Vertiv's most valuable assets are its employees. We support our employees and are committed to respecting their fundamental rights at work. Further:
 - We do not accept forced, bonded, or indentured labor. Involuntary or exploitative prison labor, slavery, or trafficking of persons is prohibited. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. It is prohibited to hold or otherwise destroy, conceal, confiscate, or deny access by employees to their identity or immigration documents, such as government-issued identification, passports, or work permits, unless such holdings are required by law.
 - We provide all employees, including those hired by recruiters, with detailed and accurate work contracts or similar work papers, prior to relocation in cases where the employee must relocate to perform the work, and in a language understood by the employee. Low-skilled and migrant employees may cancel their work

contracts at any time with no financial penalty, subject to giving reasonable notice in accordance with local law or an applicable works council or collective agreement.

- We conduct appropriate document checks (including proof of age documents) of all employees before they begin work to confirm they are allowed to work according to applicable law and Vertiv policies and procedures.
 - We do not charge employees any recruitment fees.
 - We promote equal opportunities for all with respect to hiring, terms of employment, mobility, training, compensation, and occupational health, without discrimination as to age, race, color, religion, creed, sex, pregnancy status (including childbirth, breastfeeding, or related medical conditions), marital status, sexual orientation, gender identity / expression (including transgender status or sexual stereotypes), genetic information, citizenship status, national origin, protected veteran status, political affiliation, or disability. We offer reasonable employee accommodations based on disability, religion, and other areas as required by local laws.
 - We comply with local minimum age laws and requirements and do not employ child labor.
 - We pay wages that meet applicable legal requirements or, if there is no legal minimum wage, we will pay wages that align with the prevailing sector wage.
 - We assure that housing we provide for our employees meets local housing and safety standards.
 - If we hire foreign migrant workers and bring them into a country for the purpose of working for our company, we will provide or pay for return transportation at the end of their period of work.
 - When engaging recruiters, we will ensure that such recruiters and their subcontractors (1) do not charge the workers recruitment fees and (2) comply with Vertiv's Code of Ethics, this policy, the local labor laws of the country in which the recruiting takes place, and the local labor laws of the country of employment.
 - We protect our employees from harassment and an offensive or hostile work environment.
 - We will promptly investigate any reports of discrimination, harassment, or workplace violence and promptly take corrective action.
 - We encourage employees who observe or experience discrimination, harassment, or workplace violence to report such behavior to management or the Vertiv global ethics hotline.
 - We do not permit retaliation against any person that reports an incident of discrimination, harassment, or workplace violence in good faith.
- **Environment:** To the greatest extent practicable, Vertiv will avoid negative impacts to the communities in which it operates, including to the soil, air, and water.
 - **Suppliers, Recruiters, and Business Partners:** Vertiv shall require that its suppliers, recruiters, business partners, and their subcontractors abide by the principles set forth in Vertiv's Code of Ethics and this policy. Vertiv shall conduct appropriate due diligence to select suppliers, recruiters, and business partners that will ensure compliance with such principles.
 - **Data Privacy:** Many countries in which Vertiv operates have specific data protection laws regarding the processing of personal data of data subjects. Vertiv is strongly committed to complying with these laws. Accordingly, it is Vertiv's general policy that personal information and data pertaining to data subjects that is collected, stored, transmitted, or processed is protected from accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access. Personal data are used solely for legitimate purposes, and handled consistent with law.



- Any breach or violation of this policy; any other Vertiv Policies & Procedures (VP&P) or other Vertiv policy or procedure; Vertiv's Code of Conduct; applicable law, rule, or regulation; or applicable employment or consulting/professional services contract may result in disciplinary action, including but not limited to termination of employment or contract, and criminal and/or civil penalties in accordance with applicable federal, state, and local laws. For more information, see [VP&P – Policy Violations](#).

7. Exceptions

- Request for an exception to this policy must be presented to the document owner and approved by the document approver in writing. The document owner is responsible for maintaining records of any exceptions granted.

8. Reviews

- This document was reviewed and approved consistent with Vertiv Policies and Procedures.