



Global Human Rights Policy

Purpose

Vybond Group, Inc. and its subsidiaries (“Vybond”) are committed to conducting business with integrity, fairness, and respect for the dignity and rights of all people. We are committed to promoting human rights across all aspects of our business – operations, supply chains, and business relationships, regardless of geography. We operate in alignment with international human rights standards and applicable laws. Our goal is to provide a safe, fair, and inclusive workplace and to ensure that everyone connected to our business is treated with respect.

Scope

This policy applies to all Vybond locations and team members. We expect our suppliers and business partners to adhere to the ethical standards outlined herein and in our Supplier Code of Conduct.

Policy Commitments

Vybond’s human rights commitments are informed by:

- [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#)
- [ILO Declaration on Fundamental Principles and Rights at Work \(amended 2022\)](#)
- OECD Guidelines for Multinational Enterprises
- Modern slavery and human rights due diligence legislation in jurisdictions such as Germany, Canada, UK, and the USA

Core Principles

Respect for Human Dignity and Inclusion:

We foster a culture of respect, inclusion, and belonging. Discrimination, harassment, and abuse are strictly prohibited.

Freedom from Forced Labor and Modern Slavery:

Vybond prohibits all forms of forced, bonded, or indentured labor. We do not retain identity documents or require deposits. We comply with import bans on goods produced with forced labor, including but not limited to the Uyghur Forced Labor Prevention Act.

Child Labor Prohibition:

We do not allow child labor in our operations. We do not employ children under 18, except in lawful apprenticeships or internships. We believe children throughout our value chain should not be forced or coerced in trafficking, bonded labor or servitude.

Women’s Rights and Gender Equality:

We uphold the principle that women’s rights are human rights, ensuring equal pay, opportunity, and protection from discrimination, slavery, and violence.



LGBTQIA+ Rights:

We affirm the rights and dignity of LGBTQIA+ individuals and prohibit discrimination based on sexual orientation or gender identity. We respect the inherent worth and dignity of all individuals in our business.

Indigenous Peoples' Rights:

We respect the autonomy, customs, and land rights of Indigenous communities and avoid actions that infringe upon their sovereignty.

Fair Compensation and Working Hours:

We comply with wage and hour laws and ensure fair compensation. We comply with all minimum wage, overtime, and benefits practices that relate to applicable local and national laws and regulations. Where no minimum wage exists, we pay at least the prevailing industry rate.

Safe and Healthy Work Environment:

Following the [2022 ILO amendment](#), we recognize a safe and healthy workplace as a fundamental right. We prohibit physical or mental abuse and maintain clean, secure facilities.

Freedom of Association and Collective Bargaining:

We respect employees' rights to organize and bargain collectively, in accordance with national labor laws.

Legal Employment and Immigration Compliance:

We verify the legal work status of all employees and comply with immigration laws.

Human Rights Defenders:

We support the role of Human Rights Defenders in our supply chain. We do not tolerate threats, intimidation, or retaliation against anyone who raises concerns in good faith about potential human rights impacts related to our operations or supply chain. We encourage open dialogue and are committed to addressing concerns constructively and transparently.

Risk Management and Due Diligence

- We conduct annual human rights risk assessments as part of our enterprise risk management.
- Suppliers undergo human rights and labor standards audits.
- We implement mandatory human rights due diligence aligned with emerging global legislation.
- We invest in supply chain traceability beyond Tier 1 suppliers and use tools like audit trails to verify sourcing.



Training and Awareness

- All team members receive human rights training, including how to identify red flags and report concerns.
- We collaborate with suppliers to build capacity and promote ethical practices.

Reporting and Accountability

- Concerns can be raised confidentially through the [Paycom Hotline 24/7](#).
- Reports may also be directed to Managers, HR, or Legal & Compliance (legal@vybond.com).
- Retaliation for good faith reporting is strictly prohibited
- Throughout investigations, Vybond will maintain confidentiality, to the extent possible, based on its legal and ethical responsibilities.

Version Control

Date	Version Number	Purpose/Change	Author/Approver
December 15, 2025	1.0	Original Version	Sr Legal & Compliance Manager