



EC-203 Fundamental Human Rights

SECTION:

Employee Relations

SCOPE:

This policy applies to all employees associated with Elevate Care International (ECI) and its affiliated brands (Comfort Keepers, Prestige Nursing and Care, The Good Care Group, Oxford Aunts).

OWNER:

Chief Human Resources Officer (CHRO)

People are at the heart of our business model, and meeting their expectations is one of our priorities. Respect for human rights is essential to Elevate Care International's mission to improve the Quality of Life of our employees and of all whom we serve and to contribute to the economic, social and environmental development of the communities, regions and countries where we operate. Respect for human rights is therefore a pillar of our Responsible Business Conduct commitments.

As a global employer, Elevate Care International faces a variety of local contexts regarding human rights, and it may not always have control over these situations.

- Elevate Care International makes the following commitments regarding human rights:
- Elevate Care International respects human rights wherever we do business.
- Elevate Care International seeks to conduct its business in a manner that will not infringe upon the human rights of others, and we will address adverse human rights impacts that result from our business activities.
- Through human rights due diligence, Elevate Care International will seek to identify, prevent, and mitigate adverse human rights impacts that we may cause or contribute to or to which we may be linked directly by our business relationships.

OUR WORKPLACES

These commitments apply to every one of our employees throughout the world. All leaders, executives, and managers are responsible for knowing, abiding by, and communicating our commitments regarding human rights and to embed them in their operations, policies, and practices.

Elevate Care International expects our teams to observe the following minimum standards for our people working throughout the world:

SAFE, HEALTHY AND SECURE WORKPLACE

Elevate Care International embraces a global health and safety culture and seeks to deliver world-class health and safety performance. Elevate Care International will provide a safe and healthy workplace and working conditions, which comply at a minimum with applicable laws and regulations and will be subject to Elevate Care International's workplace health and safety program.

DIVERSE AND INCLUSIVE WORKPLACE





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Elevate Care International is committed to hiring employees based on the criteria of qualifications, competence, experience and other job-related criteria. These criteria also apply to all situations at work, e.g., recruitment, working with a client, selection for a project assignment or a promotion, or termination, and many more.

Elevate Care International fights against discrimination and is an inclusive employer. We want our diverse workforce to feel good and well-integrated at work. Elevate Care International seeks to provide to all employees the best possible work-life experience regardless of gender identity, sexual orientation, age, ethnicity, citizenship, race, color, religion, marital status, pregnancy, genetic information, disability, and any other characteristics protected by the law.

RESPECTFUL WORKPLACE

Elevate Care International expects all employees to treat each other with decency and respect. This includes ensuring that security and other procedures demonstrate respect for personal dignity and privacy. Elevate Care International forbids violence in the workplace and any verbal, emotional, psychological, sexual, physical, or other form of harassment, abuse, intimidation, or bullying. Anybody engaging in such behavior will be subject to discipline, including immediate termination.

NO FORCED LABOR AND NO HUMAN TRAFFICKING

Elevate Care International believes in the elimination of all forms of forced labor and has a zero tolerance for slavery or human trafficking in any part of our business. Therefore, it ensures that everyone is free from forced labor, threats, serious harm or physical restraint and commercial sex; ensures that anyone is free to resign at any time from any kind of work; is loyal and keeps promises about working conditions. In addition, Elevate Care International prohibits recruitment fees - no one should pay to work for us - and covers all the costs associated with the recruitment process.

NO CHILD LABOR

Elevate Care International will respect local child labor laws. Any employment of young workers is subject to legal limitations, based on local regulations, regarding hours of work, wages, working conditions, age and minimum education.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Elevate Care International is committed to respecting the right of employees to join the union of their choice or not, and to bargain collectively free from any form of retaliation or discrimination. We will bargain in good faith with lawful employee representatives. We will abide by the laws of the countries in which we do business and work within the legal framework of each country to ensure respect for freedom of association and collective bargaining.

In countries where the right of association and collective bargaining is restricted under law, we will facilitate the development of parallel means of workers' representation (e.g., meetings, coffee breaks, engagement surveys).





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LAWFUL WAGES, BENEFITS, AND WORK-TIME

Elevate Care International expects that all employees will be paid lawful wages and benefits on a timely scheduled basis for all time that they have worked. Our teams will observe all applicable laws and regulations for working hours for employees, including maximum hour limitations and requirements for break times. Overtime may be required only as permitted by law based upon the nature of the work.

OUR BUSINESS RELATIONSHIPS

Elevate Care International will communicate these policies to our clients and suppliers. We expect our business partners to support these policies and their underlying principles. We may engage with our business partners as appropriate to address actual and potential adverse human rights impacts.

OUR COMMUNITIES

Elevate Care International does business throughout the globe. Elevate Care International seeks to contribute to the development of each of the communities where we operate and to be a responsible citizen of those communities. Our employees, clients, customers, and suppliers live and do business in these communities. We will engage stakeholders in the communities where we do business and seek to develop solutions to concerns about adverse human rights impacts in those communities that may relate to our business activities.

REPORTING CONCERNS

We welcome our stakeholders raising concerns about our business practices and their impact on human rights. Meaningful paths for reporting concerns, free from the threat of any retaliation, are especially important for our employees. Likewise, our clients and suppliers and their employees, members of the communities where we operate, and other stakeholders that may be affected by our business must also have means of drawing adverse impacts to our attention.

Elevate Care International provides an effective mechanism wherever we do business for employees and other stakeholders to raise concerns about infringement of their human rights or other adverse human rights impacts relating to our business. Our Speak Up Ethics Portal (speakup.ecibrands.com) allows everyone to confidentially report activities or behaviors that are contrary to our Code of Conduct or illegal, including breaches of human rights.

Employees may also raise such concerns through lawful collective representatives. All reports should be made in good faith. Any report of suspected human rights infringements or adverse human rights impacts will be carefully reviewed by ECI, within a reasonable timeframe, and addressed promptly and appropriately. Individuals making such reports in good faith will not be subject to retaliation, threats, or harassment, and their identity will be held in confidence to the extent possible and as permitted by law. When a report is well-founded (i.e., business abuse has indeed taken place), appropriate measures (i.e., sanction, corrective action) will be taken where necessary, regardless of the individuals concerned, and in accordance with the law and our Policy on Disciplinary Measures.





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DUE DILIGENCE AND TRANSPARENCY

In addition to addressing concerns raised through individual and collective grievance mechanisms, Elevate Care International will work proactively to assess actual and potential human rights impacts related to our business and to take appropriate measures to address the risks and impacts that we identify. This process of risk assessment, mitigation, and remediation (including our responses to reported grievances) shall be subject to regular review in order to improve its effectiveness and ensure currency.

Elevate Care International has developed the following People Fundamentals in order to ensure minimum standards that are applied to all employees.

Each “fundamental” is linked to a control and a test plan in order to evaluate and mitigate this risk. Controls are included in our internal control process.

- Safe, secure and healthy workplace
- Respectful workplace relations: no threats, harassment, discrimination, or violence
- Training tools and equipment for competent and safe job performance
- Clear management: job descriptions and objectives
- Respect for fundamental human rights at work
- Full pay: on time every time
- Fair schedules: within legal maximum with proper days off and rest breaks
- Data privacy and security for personal information
- Voice: meaningful grievance mechanism, free from retaliation to report any violations

Responsibilities:

Employee: Employees are required to be familiar with this policy. The Company expects employees to report any possible violation of this policy to one’s supervisor or as otherwise provided in this policy.

Management: Managers are required to be familiar with and enforce this policy, and to take appropriate action when violations of policy occur or are reported. It is also the responsibility of Managers to ensure there are no retaliatory actions as a consequence of an employee reporting any possible violation of policy.

Human Resources: Human Resources representatives are responsible for being familiar with this policy in order to provide appropriate guidance and to take appropriate action when violations of policy are reported.

Policy Updates:

11/1/2023	S.Kochar	Draft of all sections	Creation of Document
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01/28/2025	S.Kochar	Updated scope and footer to exclude Cherished Home Care (UK). Changed Owner from SVP HR to CHRO.	Policy Updated
02/03/2026	S.Kochar	Updated scope and footer to reflect current ECI entities.	Policy Updated

