



## **NORTHERN TECHNOLOGIES INTERNATIONAL CORPORATION HUMAN RIGHTS POLICY**

### **PURPOSE**

NTIC's approach to human rights has been designed to align with the United Nations Global Compact and core elements of the United Nations Universal Declaration of Human Rights.

NTIC is committed to providing an environment free of discrimination and harassment, where all individuals are treated with respect and dignity, can contribute fully, and have equal opportunities. The purpose of this policy is:

- To identify the types of behavior prohibited by this policy.
- To provide procedures to follow when complaints of discrimination or harassment made by partners or employees of NTIC arise.
- To ensure that all partners and employees of NTIC are aware that harassment and discrimination are unacceptable practices incompatible with our company standards, and a violation of the law.

### **SCOPE**

NTIC is committed to safeguarding the human rights of our employees and the individuals in all of our business interactions. We expect our employees and business partners to conduct business according to the highest principles of integrity, ethics, fairness and respect, and we expect our employees to comply with our [Code of Ethics](#). We are committed to contributing to the betterment of the communities in which we operate.

This policy:

- Applies at every level of NTIC, and extends to all partners and employees (including full-time, part-time, temporary and contract staff).
- Applies to every aspect of the employment relationship, including recruitment, selection, promotion, transfers, training, salaries, benefits, discipline and performance appraisals.
- Applies to the physical offices of NTIC.

- Extends to the outside offices of NTIC (such as work from home, off-site client meetings, business travel, firm-sanctioned social events and to electronic communications).

## **FREEDOM OF ASSOCIATION**

NTIC respects employees' voluntary freedom of association and right to bargain collectively and complies with pertinent local laws where we operate.

NTIC, along with its affiliates and subsidiaries, complies with applicable laws protecting the rights of workers to freely associate in accordance with core International Labor Organization (ILO) conventions. All of our businesses globally must respect the rights of workers to freely associate, organize and bargain collectively in accordance with applicable laws and the customs of the countries in which they are employed. All of our businesses must respect the rights of workers to communicate openly with management regarding working conditions without fear of retaliation, harassment, intimidation, penalty or interference.

## **FORCED LABOR**

NTIC, including its subsidiaries, joint venture, suppliers and vendors, does not engage in and will not tolerate the use of slavery, human trafficking or the use of forced labor of any kind. If it is discovered to occur then the responsible party will be immediately terminated or the supplier vendor relationship will be immediate terminated.

## **CHILD LABOR**

NTIC, including its subsidiaries, joint venture, suppliers and vendors, abides by all applicable minimum age laws and regulations. NTIC does not use or condone the use of child labor in violation of applicable law in the conduct of our business. NTIC prohibits the employment of employees who are under the international minimum age for work (15 years) and has a minimum hiring age of 18 unless approved in writing by the CEO or CFO. All employees under the age of 18 are prohibited from engaging in any hazardous work, night shifts or overtime work, work should be limited to office or simple production work. Additionally, NTIC will periodically review with outside counsel all hiring procedures to ensure they are effective and up to date with all national laws. NTIC requires all employees provide valid government issued documentation of their age prior to starting employment. HR will maintain documentation and annually review employees to verify that NTIC does not employ anyone under the age of 18.

## **COMPENSATION AND WORKING TIME**

NTIC has established fair and competitive pay levels that are based on local markets and job descriptions and are not based on gender, age, ethnicity, nationality or other personal characteristics or beliefs. We provide compensation and benefits that are competitive and comply with applicable laws and we are committed to a fair and living wage. NTIC prohibits fees in return for employment and prohibits unlawful wage deductions from employees. Additionally, NTIC agrees to pay all costs associated with recruitment vis intermediaries e.g. fees for visas, permits, ID cards, medical certificates, travel etc.

## **PROFESSIONAL DEVELOPMENT**

NTIC offers an Educational Assistance benefit program to its eligible employees. NTIC may reimburse all or part of the registration and tuition costs for full-time employees who continue their education in a work-related field, up to a maximum of \$1,000 per year, unless otherwise approved by NTIC's Chief Financial Officer or Head of Human Resources.

In addition to educational assistance for formal education, NTIC may arrange training programs that enable employees to progress in their technical, commercial, or financial knowledge of NTIC's business.

## **CONFLICT MINERALS**

NTIC is committed to sourcing materials from companies that share NTIC's values around human rights, ethics and environmental responsibility. NTIC supports the Dodd-Frank Section 1502 legislation that discourages companies from engaging in trade that supports conflicts and human rights violations in the Democratic Republic of Congo (DRC) and neighboring countries. To this end, we do not knowingly purchase products containing conflict minerals.

Further, NTIC requires its suppliers, and their complete supply chain, to comply with Dodd-Frank Section 1502 and NTIC's Conflict Minerals Policy.

NTIC recognizes that its compliance with these obligations will require time and effort from the members of its supply chain. However, NTIC expects that suppliers will take reasonable, good faith steps toward assisting NTIC in achieving its compliance obligations. If NTIC becomes aware of a supplier whose supply chain includes conflict minerals from conflict mines, NTIC will take appropriate action, up to and including, termination of the commercial relationship.

## **DIVERSITY & EQUAL OPPORTUNITY**

NTIC has worked to build a diverse and inclusive workforce and is committed to equal opportunity, in regard to all hiring decisions, including the hiring/promoting of all management positions and Board of Directors appointments. NTIC invests in building diverse talent pools and providing training to improve skills, where appropriate. NTIC has implemented a comprehensive Equal Opportunity, Non-Discrimination and Anti-Harassment Policy.

## **DISCRIMINATION & HARASSMENT FREE WORKPLACE**

NTIC upholds and supports the right to equal treatment without discrimination or harassment.

This policy prohibits discrimination or harassment on the basis of the following grounds, any combination of these grounds, and any other status protected by applicable law:

- Age
- Creed (includes religion)

- Sex
- Gender Identity and Gender Expression
- Sexual Orientation
- Family status (such as a parent-child relationship)
- Marital status (including the status of being married, single, widowed, divorced, separated, or living in a conjugal relationship outside of marriage, whether in a same sex or opposite sex relationship)
- Disability (including mental, physical, developmental or learning disabilities)
- Ethnicity
- Race
- National or Social Origin
- Citizenship
- Color
- Political Opinion

NTIC is committed to a respectful work environment free of any manner of physical and verbal harassment, including bullying, mobbing and sexual harassment. This is also referenced in NTIC's Anti-Harassment Policy on page 8 of the NTIC Employee Handbook. How to report harassment or objectionable conduct is also covered. NTIC takes all violations of this policy seriously and imposes consequences for violations, which may include termination of employment.

## **COMPLIANCE POLICIES**

Employees are mandated to adhere to existing corporate policies for global competition, anti-corruption, and ethical business conduct, as also referenced in NTIC's Foreign Corrupt Practices Act Policy, which is part of the NTIC Employee Handbook. NTIC specifically prohibits offering, promising, making, requesting, or accepting or agreeing to accept any payments or favors that might be considered improper or illegal.

Management and applicable employees are trained on anti-bribery and corruption topics, including applicable laws and regulations, and are encouraged to report any suspicions of wrongdoing. Managers are required to execute an FCPA acknowledgement form every two years.

## **IMPLEMENTATION**

NTIC's Human Rights Policy has been communicated and is accessible to all employees via NTIC's SharePoint site.

## **VIOLATIONS OF THIS POLICY**

If an employee believes that there may have been a violation of this policy, it should be reported through established channels including but not limited to:

- The manager of the department in which the violation occurred
- Any member of NTIC management
- The employee's HR Manager
- The Chief Executive Officer

NTIC strictly prohibits retaliation in any form against anyone who makes a good faith report about suspected violations or cooperates in an investigation of an alleged violation.

Suspected violations may also be reported anonymously via NTIC's whistleblowing hotline at (612) 607-7287 to our outside legal counsel.

NTIC expects its suppliers, vendors and contractors to abide by all laws, rules and regulations in effect in the countries and jurisdictions in which they do business.

## **ADMINISTRATION**

NTIC's Human Resources Administrator has overall responsibility for the administration of the policy.

NTIC's Chief Financial Officer and Chief Executive Officer have overall responsibility in ensuring appropriate follow-through of reported violations.

Supervisors and managers at all levels are responsible for upholding this policy and fully supporting NTIC's efforts to create a respectful, fair and safe work environment; to model their behavior accordingly, and to report non-compliance with this policy.

All Employees are responsible for treating co-workers with respect and dignity, valuing different thinking and ideas, working effectively across differences and reporting any violations of the principles presented herein.

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