

Universal Synergetics, Inc.

Human Rights Policy



Respect for Human Rights

Respect for human rights is a fundamental value of Universal Synergetics, Inc. dba T.H.E.M. of New Jersey. We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights in our relationships with our employees and suppliers. Our aim is to help increase the enjoyment of human rights within the communities in which we operate.

This Policy is guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

The Company also expects our suppliers to uphold these principles and urges them to adopt similar policies within their own businesses.

We use due diligence as a means to identify and prevent human rights risks to people in our business and supply chain. Where we have identified adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in, their fair and equitable remediation. We seek to promote access to remediation where we are linked to or involved in those adverse impacts through our relationships with third parties.

The Human Rights Policy is overseen by USI's Board of Directors, including the President and Chief Executive Officer.

Community and Stakeholder Engagement

We recognize that we are part of the community in which we operate. We engage in human rights matters that are important to our community such as land rights, access to water and health. Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business. This includes issues in our Company, across our supply chain, through which we see to promote respect for human rights.

Diversity and Inclusion

We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain a workplace that is free from discrimination or harassment on the basis of 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 qualifications, performance, skills and experience.

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

Freedom of Association and Collective Bargaining

We respect our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment.

Safe and Healthy Workplace

The safety and health of our employees is of paramount importance. 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 to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

Universal Synergetics, Inc. Human Rights Policy (continued)

Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided and are maintained with respect for employee privacy and dignity.

Forced Labor and Human Trafficking

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

Child Labor

We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

Work Hours, Wages and Benefits

We compensate employees competitively relative to the industry and local labor market. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

Land Rights and Water Resources

We respect the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation. We recognize the significant implications regarding respect for human rights that land use and water use across our supply chain may have, and make every effort to address this issue through policy and action.

Guidance and Reporting for Employees

We strive to create a workplace in which open and honest communication among all employees is valued and respected. The Company is committed to comply with applicable labor and employment laws, as well as making employees aware of the Human Rights Policy through the employee handbook and employee training.

Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the company, or who has questions about this policy or would like to confidentially report a potential violation of the policy, should raise those questions and concerns with Human Resources. No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

Who does this policy apply to?

This policy applies to all business partners and suppliers. We expect all business partners and suppliers to abide by this policy. If there is a difference between the content of this policy and any local law or regulation, the more stringent requirement will apply.

Monitoring and Remediation

We are committed to working directly with our suppliers and customers to tackle human rights issues where we become aware of them. Our Human Resources department can be accessed by those in our supply chain. Where matters are brought to us, we are committed to protect the rights of those reporting matters, and we do not tolerate reprisal against anyone who raises a matter in good faith or where they have assisted an investigation.

We routinely review these mechanisms, along with any feedback on them, developing our approach to improve the process where practical.

Universal Synergetics, Inc. Human Rights Policy (continued)

How are we putting this policy into practice?

Our Human Rights policy is agreed to by our President & CEO, who reports directly to the Board. Responsibility for delivery is shared between members of Universal Synergetics, Inc.'s executives, all of whom report to the President & CEO.

Responsibility for day-to-day delivery of our Human Rights Policy is everybody's responsibility. All of our employees receive training on Human Rights and the Ethical Trading Initial Base Code is posted throughout our office. We will also work with our partners, suppliers and third-party vendors to communicate our policy, as appropriate.

How does this apply to me?

I am expected to:

- treat everyone with dignity and respect;
- celebrate cultural and individual diversity;
- not tolerate discriminatory, offensive or intimidating behavior, harassment, or bullying;
- commit to the highest standards of safety;
- not knowingly work with anyone known or suspected to be acting in a way that infringes on anyone's human rights, such as not complying with wage and hour laws, permitting exploitation of children, or not respecting a choice to join or not join a trade union; and,
- require partners, suppliers and other third parties with whom I work to adopt similar standards with respect to human rights.

The Company reserves the right to amend this policy at any time. Nothing in this policy says or implies that a contract exists between the Company and its employees or that participation in this program is a guarantee of continued employment with Universal Synergetics, Inc.