

# Pinnacle Group Policies and Procedures

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## Labor and Human Rights Report

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| <b>Revision Date</b> | August 1, 2021                  |
| <b>Doc. Owner</b>    | Pinnacle Group Legal Department |

## Executive Summary

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This policy document is designed to provide an overview of Pinnacle Group's Labor and Human Rights policies and responsibilities.

## Qualitative Objectives and Commitments:

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### Employee Health and Safety Policy Includes:

#### Driving for Work

If an employee's job requirements include driving, the employee must:

1. Have a valid driver's license and no more than one conviction in the past eighteen (18) months for driving under the influence of alcohol or drugs, or reckless driving;
2. Maintain minimum insurance coverage required by law if the employee is driving a personal vehicle;
3. Not operate the vehicle while under the influence of alcohol or any controlled substance that could impair the driver, and not use a cell phone or PDA or engage in behavior that could be distracting while driving;
4. Not allow unauthorized people to ride in or drive the vehicle;
5. Comply with all laws regarding the use of cellular phones while operating a vehicle;
6. Observe all applicable parking and traffic regulations, including using seatbelts; parking or traffic violations will be the employee's sole responsibility; and
7. Report all accidents, property damage, personal injury, or moving violations as soon as possible and no later than 8 hours after the incident occurred to Pinnacle's Risk Manager at 214-740-2443

**Smoke-Free Workplace:** Pinnacle provides a smoke-free workplace. Employees are prohibited from smoking inside any Pinnacle or client building. Employees must comply with rules regarding smoking and using tobacco at client sites. This also includes the smoking or use of E-cigarettes, and depending on the client site, may also include the use of chewing tobacco.

**Drug and Alcohol-Free Workplace:** Employees are prohibited from bringing alcohol, unlawful drugs, or other illegal controlled substances into Pinnacle or client premises, and from working while under the influence of alcohol, drugs, or illegal controlled substances. If an employee is suspected of being under the influence of alcohol, drugs, or illegal controlled substances while at work, he or she may be required to take a drug test. Employees are prohibited from using prescription or over the counter medication that might impair their ability to safely operate equipment or otherwise perform their job duties in a safe manner. Violations of this policy including refusal to submit to a drug test, will be subject to disciplinary action, which may include dismissal from employment. Post-accident testing and random testing may also be required. As is

true of all our policies, this policy will be administered in strict compliance with our policy regarding discrimination and the equal treatment of all.

**Violence in the Workplace:** Violence in the workplace will not be tolerated. Employees who commit or threaten to commit acts of violence while on Pinnacle or client premises, or while on duty for Pinnacle will be subject to disciplinary action, which may include dismissal from employment.

Employees should report any violence they observe in the workplace, including any threat of violence, regardless of whether they were directly involved, to their Pinnacle supervisor or client point of contact or to Human Resources immediately.

**Weapons in the Workplace:** Employees are prohibited from bringing weapons of any kind into Pinnacle or client premises. Employees who bring weapons into the workplace will be subject to disciplinary action, which may include dismissal from employment. Like all policies, this will be administered in strict compliance with applicable law.

**Safety and Emergency Procedures:** Employees must follow all safety and emergency procedures for their worksites, whether established by Pinnacle or the client. Employees who do not follow safety and emergency procedures will be subject to disciplinary action, which may include dismissal from employment.

Employees are encouraged to report health and safety hazards or any related concerns to Pinnacle's Risk Manager at 214-740-2443. Pinnacle prohibits taking adverse employment action against employees who report health or safety hazards. In case of emergency, employees are instructed to dial 9-1-1.

**On-the-Job Injuries and Worker's Compensation:** Employees must notify their Pinnacle supervisor or client point of contact and Human Resources if they are injured on the job, no matter how insignificant the injury may seem when it occurs. Pinnacle carries Worker's Compensation Insurance for all employees in accordance with the laws of the states where employees work. If an employee takes leave in connection with a Worker's Compensation claim any accrued PTO or paid sick leave will be applied concurrently with the Worker's Compensation leave as permitted by law.

## **Working Conditions**

Pinnacle recognizes that from time to time, employees have questions or concerns regarding their work, Company policies and procedures or other matters. We value and encourage open and honest discussion, which is why our Open Door philosophy is such an important part of our culture. Clear, open, honest and respectful communication is essential. Employees should feel comfortable discussing any issue with the person or people directly involved, their manager or Human Resources. Employees can also go to [www.mysafeworkplace](http://www.mysafeworkplace) or contact 1-800-461-9330 and anonymously report their concerns 24 hours a day, 7 days a week.

## **Social Dialogue**

**Freedom of Association.** Pinnacle recognizes and respects the rights of its employees to freedom of association and collective bargaining. Strict compliance with the National Labor Relations Act is mandated. Pinnacle does not infringe upon its employees' ability to form or join a union.

**Bribes and Kickbacks.** Pinnacle does not permit or condone bribes, kickbacks, loans or any other illegal, secret or improper payment, transfer or receipts. Strict compliance with the Foreign Corrupt Practices Act is mandated. This prohibition applies both to the giving and the receiving of payments or gifts. Offering or giving money or anything else of value, directly or indirectly, to government officials, parties or candidates for the purpose of obtaining or retaining business or to secure any improper advantage in the United States or abroad is illegal.

**Open Door Policy.** Pinnacle recognizes that from time to time, employees have questions or concerns regarding their work, Company policies and procedures or other matters. We value and encourage open and honest discussion, which is why our Open Door philosophy is such an important part of our culture. Clear, open, honest and respectful communication is essential. Employees should feel comfortable discussing any issue with the person or people directly involved, their manager or Human Resources. Employees can also go to [www.mysafeworkplace](http://www.mysafeworkplace) or contact 1-800-461-9330 and anonymously report their concerns 24 hours a day, 7 days a week.

## **Career Management and Training**

**Pinnacle Provides Management, Evaluation and Training.** Pinnacle provides annual evaluations for its corporate employees as well as access to free training through its subscription to Pryor Learning Solutions. Pinnacle also provides career coaching and training upon request of its consultants.

## **Child Labor, Forced Labor and Human Trafficking**

**Child Labor Prohibited.** Pinnacle does not allow for the employment of child labor. Any person under the age of 15 (or 14 where laws of the state or country permit), is under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greater, is considered a child. Any worker under the age of 18 that is employed by Pinnacle will be shown particular care to ensure they are able to carry out the duties assigned in the conditions that they are required to work in. Pinnacle will ensure that no physical, mental or other harm as a direct or indirect result of their work or working conditions is incurred.

Pinnacle Group goes beyond the letter of the law in complying with applicable employment standards. We believe in complying with the spirit of the law as well as the letter of the law and expect our employees to treat all people with respect, dignity, courtesy, and fairness. Our

commitment is to maintain a safe work environment for all people, free of abusive practices, exploitative conditions or harassing conduct. Our policies set out these expectations in detail, and we reinforce them through regular training, and enforce them vigorously as needed to ensure we live up to our commitments.

**Human Trafficking and Forced Labor Prohibited.** Pinnacle does not tolerate human trafficking or forced labor of any kind and we adhere to all international labor and immigration laws and regulations wherever we operate and encourage our clients and supply chain partners to do the same.

### **Diversity, Discrimination and Harassment**

**A company-wide commitment to drive diversity and inclusion.** As a certified minority- and women-owned business, Pinnacle Group understands and appreciates the contributions that diverse talent and suppliers make to our company, our economy, and our country. For that reason, Pinnacle Group diligently pursues diverse talent and suppliers.

**One of our cornerstones is a diverse and fully capable supply chain.** Pinnacle Group is fully committed to developing a supplier base that is as diverse as the global workforce. To this end we're an active member in multiple diverse supplier organizations including the National Minority Supplier Development Council (NMSDC) and Women's Business Enterprise National Council (WBENC).

**Investments in growing small businesses drive community development.** We believe in building the communities we live in and serve. To help achieve this for our diverse suppliers, Pinnacle Group actively seeks out and contributes to the success of diverse, small businesses. We foster key relationships and provide opportunities to become Tier 2 prime suppliers for our clients. In turn, these relationships enable our diverse suppliers to have a positive and sustainable impact on the communities they live in and serve.

**Pinnacle Group is a true partner for client diversity initiatives.** In order to help our clients gain maximum benefit from their contingent labor programs, we actively seek out, mentor, and support new suppliers that are from underrepresented diversity categories. We also work hand-in-glove with clients to help supplement their diversity initiatives in a meaningful way, including inclusion among the Billion Dollar Roundtable.

**A diverse workforce delivers top notch talent to Pinnacle Group and its clients.** We are also deeply committed to growing a diverse workforce. Pinnacle is an equal opportunity employer that goes above and beyond to embrace not only the letter of this commitment but also the spirit of this commitment. Our corporate employees are representative of this value and we've continued to provide exceptional opportunities to women and minority candidates who deliver top notch talent to Pinnacle Group and our clients. The representation of women among our corporate employees is consistently over 60% and the representation of minority groups consistently exceeds 40%. We

also provide training on anti-discrimination in the hiring and employment process to 100% of our employees, ensuring that they deliver top talent to our clients regardless of any protected characteristic, and provide equal opportunity to all candidates.

**Equal Employment Opportunity.** Pinnacle is an equal opportunity employer and does not discriminate in any aspect of employment on the basis of age, color, disability, genetic characteristics, national origin, race, religion, sex, gender identity, sexual orientation, veteran status, status as a parent, or any other characteristic that is protected by federal, state or local law.

**Affirmative Action.** Pinnacle is an affirmative action employer. Pinnacle's affirmative action plan is administered by its Director of Human Resources.

**Employment of People with Disabilities.** Pinnacle does not discriminate against qualified individuals on the basis of disability in any aspect of employment. Qualified individuals are those applicants or employees who can perform the essential functions of the position with or without a reasonable accommodation. Accommodations may be requested from Human Resources. Requests for accommodation shall be considered through an informal, interactive process between the employee, the employee's immediate Pinnacle supervisor, and Human Resources. An employee may be required to provide documentation during the accommodation process, including statements from medical providers, in order to establish eligibility for accommodation and the effectiveness of proposed accommodations. Reasonable accommodations that do not cause undue hardship for Pinnacle will be provided to qualified individuals. All documentation obtained during this process will be kept confidential to the extent possible, maintained separately from personnel files, and accessible only to authorized individuals. Like all processes, this will be administered in full compliance with all applicable law.

**Unlawful Discrimination Prohibited.** Pinnacle prohibits unlawful discrimination in all aspects of employment on the basis of age, color, disability, genetic characteristics, national origin, race, religion, sex, gender identity, sexual orientation, veteran status, status as a parent, or any other characteristic protected by federal, state or local law.

Employees who engage in unlawful discriminatory practices will be subject to disciplinary action, which may include dismissal from employment.

Discriminatory practices include:

1. Basing employment decisions on stereotypes or assumptions about people because of age, color, disability, genetic characteristics, national origin, race, religion, sex, gender identity, sexual orientation, veteran status, status as a parent, or any other characteristic protected by federal, state or local law; or
2. Harassing others on the basis of age, color, disability, genetic characteristics, national origin, race, religion, sex, gender identity, sexual orientation, veteran status, status as a parent, or any other characteristic protected by federal, state or local law; or

3. Taking adverse employment action against a person who is married to or associated with an individual who has a certain disability or genetic characteristics, or is of a certain age, color, national origin, race, religion, sex, gender identity, sexual orientation, veteran status, status as a parent, or any other characteristic protected by federal, state or local law; or
4. Retaliating against an individual for filing a complaint of discrimination, participating in an investigation, or opposing discriminatory practices.

**Unlawful harassment is prohibited.** Harassment is unwelcome verbal or physical conduct that creates an unpleasant or hostile situation that is based on a person's age, color, disability, genetic characteristics, national origin, race, religion, sex, gender identity, sexual orientation, veteran status, status as a parent, or any other characteristic protected by federal, state or local law.

Harassment becomes unlawful when: (1) enduring the offensive conduct becomes a condition of continued employment, or (2) the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

**Sexual Harassment.** Sexual harassment is a specific type of harassment that can include unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when:

1. Submission to or tolerance of such conduct is made either explicitly or implicitly a term or condition of an individual's employment; or
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance, or creates an intimidating, hostile, or offensive working environment.

**Making a Complaint.** Employees who believe they or other employees have been victims of discrimination, harassment, or retaliation should notify Human Resources immediately. If an employee is not comfortable reporting the concern to Human Resources, then the employee should report their concerns by calling or reporting to Pinnacle's MySafeWorkplace hotline (available 24 hours a day, 7 days a week).

- Phone: 1-800-461-9330 (reports can be taken in many languages)
- Website: [www.MySafeWorkplace.com](http://www.MySafeWorkplace.com) (select "Make a Report Online Now," type Pinnacle in the "Organization Search Box" and select the appropriate Pinnacle entity from the drop down menu)

Upon submission of a report, the individual will be provided with a unique access code and will be asked to generate a personal password. Document this code and password, as it will be necessary in order to follow up on the report either by phone or through the website. Once the code and

password are entered, the individual can have an anonymous dialogue with Pinnacle through the message board section of the report marked “Talk to Your Organization.” Instructions are provided at the front of this Handbook. Pinnacle supervisors must immediately notify Human Resources of any complaints they receive and/or violations they observe.

**Retaliation Prohibited.** Employees are prohibited from taking any adverse employment action against an individual who has made a complaint of discrimination (including harassment, sexual harassment, or retaliation), participated in an investigation, or opposed discriminatory practices. Employees who violate this policy will be subject to disciplinary action, which may include dismissal from employment.

**Investigation and Resolution of Complaint.** Human Resources will investigate, or cause to be investigated, all claims of discrimination, harassment, or retaliation filed by or against a Pinnacle employee or a third party’s employee. Human Resources may take any action it deems necessary and appropriate to resolve a complaint in compliance with applicable law. Employees who violate Pinnacle’s discrimination, harassment, or retaliation policy will be subject to disciplinary action, which may include dismissal from employment.

### **External Stakeholder Human Rights**

Pinnacle continues to fulfill the commitment of its clients to maintain their standards regarding human rights. Pinnacle has not had any negative evaluation by its clients regarding human rights and work environments.

## **Scope of Application:**

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This Report encompasses all full-time, part-time and temporary employees of Pinnacle Group, including all contract employees.

## **Allocation of Responsibilities:**

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Pinnacle Group’s General Counsel will be the Executive in charge of Labor and Human Rights Issues. Implementation of procedures will be undertaken by the Legal Department, Human Resources Department, Compliance Department, Risk Management Department and the IT Department.

## **Quantitative Objectives:**

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Pinnacle’s objective is to continue to monitor its employee hotline for any reports regarding any and all labor and human rights issues. Should any issues be reported, Pinnacle will take immediate action to investigate and address the issues. Pinnacle will also continue to report and respond to any requests made by its customers and monitor its suppliers regarding all labor and human rights issues.

| Social Index   | 2019 | 2020  |
|--|------|-------|
| Percentage of new employees receiving training on labor and human rights issues as part of their onboarding.   | 100% | 100%  |
| Number of employees covered by a collective bargaining agreement.  | 0    | 0     |
| Number of whistleblower complaints made to Pinnacle’s MySafeWorkplace hotline.   | 0    | 0     |
| Injury Severity Rate – lost work days per 100 employees.<br>Injury Severity Rate = (number of work days lost + light duty days lost) x 200,000/total hours worked. |      | 3.013 |

## Review Mechanisms:

Pinnacle Group’s Labor and Human Rights Report is reviewed annually. The next review is scheduled for August 1, 2022. Any significant changes to activities or operations will be reviewed by the Legal Department outside of the annual review and the Report amended as necessary.