ONTERRIS, INC.

HUMAN RIGHTS POLICY

At Onterris, Inc. (Onterris), we understand that fulfilling our mission of protecting the air we breathe, the water we drink and the soil that sustains us means caring for the entire ecological system. In doing so, we recognize the interconnectedness between environmental sustainability and the well-being of individuals and communities. We firmly believe that everyone, regardless of their background, should be safeguarded through our business practices, upholding their right to life, liberty, security of person and dignity.

The Onterris Code of Conduct and Ethics Policy is the foundation of our commitment to human rights. The Code of Conduct and Ethics Policy formalizes our expectations with respect to integrity, sound judgment, ethical conduct and adherence to laws.

This Human Rights Policy builds upon our Code of Conduct and Ethics Policy and outlines how we aim to protect the internationally recognized fundamental rights and freedoms established by the Universal Declaration of Human Rights through our daily business practices and operations, as well as our supply chain and procurement practices.

Commitment

In alignment with the United Nations Guiding Principles on Business and Human Rights, and consistent with the International Labor Organization (ILO) Core Conventions, Onterris upholds and promotes human rights in the following areas:

Discrimination and Harassment

- Onterris is committed to providing a work environment that is free of unlawful discrimination, including harassment, bullying or other abusive behavior.
- Onterris forbids any unwelcome conduct or denial of opportunity that is based on an individual's race, color, national or ethnic origin, religion, sex (including gender, gender identity, pregnancy and sexual orientation), age, disability, genetic information, military or veteran status or any other characteristic protected by applicable law.
- Onterris commits to fairness in our recruitment, hiring and promotion practices. All qualified candidates will be treated fairly and considered without discrimination.
- Onterris aims to ensure pay equity and adoption of fair compensation practices. We regularly evaluate our compensation programs to identify and address unjustified pay disparities.

Child Labor

- Onterris complies with all local minimum age laws and requirements and will not utilize child labor in any part of our organization.
- Onterris will not knowingly conduct business with suppliers that engage in child labor.

Forced Labor and Human Trafficking

- Onterris will not employ forced or indentured labor and will not tolerate or condone human trafficking or other coerced labor in any part of its organization.
- Onterris will not knowingly conduct business with suppliers that engage in forced labor (i.e., modern slavery) or human trafficking.

Freedom of Association and Collective Bargaining

- Onterris respects every employee's right to freedom of association and right to join collective bargaining organizations.
- Onterris is committed to open and constructive dialogue with employees and their representatives and forbids discrimination or retaliation against any employee for exercising these rights.

Working Conditions

- Onterris treats all persons with respect and integrity; we conduct our business fairly and ethically.
- Onterris provides just and favorable working conditions and reasonable working hours across the organization. Our employees' wages and salaries comply with minimum wage regulations in all regions of operation, and we strictly adhere to relevant laws regarding working hours and remuneration.

Employee Health and Safety

- Onterris recognizes that all employees have the right to a safe and healthy working environment; we are committed to protecting the health and safety of our employees so that everyone can do their job safely and without injury or illness.
- Onterris employees are required to comply with health and safety policies and procedures; no employee is to be directed to complete a task that cannot be done safely. All employees, contractors and visitors have the authority to stop work if working conditions or behaviors are unsafe.
- Onterris employees are required to actively participate in our health and safety programs by implementing safe work practices, reporting incidents and unsafe conditions and completing mandatory health and safety training courses.

Violations and Resolution

Onterris will not be complicit in human rights violations. Known or suspected human rights violations must be reported immediately to the Senior Vice President, Human Resources or the General Counsel. Employees should not attempt to gather evidence or confront potential violators. Alternatively, concerns or grievances can be reported by employees or external stakeholders anonymously and confidentially through our third-party ethics hotline by phone (+1 844-319-4551) or via the online platform.

Onterris will treat each report of potential human rights violations seriously and no retaliation will be taken or tolerated against anyone for reporting or supplying information about a valid concern. Onterris will promptly review reported concerns upon receipt and conduct a thorough investigation in accordance with our Code of Conduct and Ethics Policy.

Communication and Training

This policy is communicated to our employees so that our workforce understands our human rights commitments and knows the steps to take if human rights violations are identified or suspected. This policy is also communicated to our external stakeholders through our website.

All employees are required to complete our annual Code of Conduct and Ethics training program to support policy implementation. Additionally, all employees are required to complete regular harassment prevention training.

Governance

The Onterris Board of Directors and its committees provide active oversight regarding the implementation of our policies, including this Human Rights Policy.

The development and maintenance of this policy is the shared responsibility of the Onterris General Counsel and Senior Vice President, Human Resources. This Policy will be reviewed periodically and updated as needed to reflect our ongoing commitment to human rights.

Scope and Applicability

All Onterris operations, including our businesses, locations and employees globally, are covered by this Human Rights Policy. Additionally, Onterris will not knowingly conduct business with suppliers that engage in child labor, forced labor or human trafficking or otherwise operate in non-compliance with applicable laws and regulations.

Vijay Manthripragada
President and CEO, Onterris, Inc.
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