

coDesign**Human Rights & Working Conditions Policy***Fair Labor, Non-Discrimination, and Worker Protection Standards*

Version 3.3 · Effective Mar 2026

coDesign is committed to treating every employee and worker on our projects with dignity, fairness, and respect, and to upholding the human rights set out in the Universal Declaration of Human Rights and the core conventions of the International Labour Organization (ILO). This Policy has been agreed upon by coDesign's senior management and applies across all coDesign locations; it is a condition of employment for every coDesign employee and supervisor.

coDesign designates senior management representation accountable for social sustainability, reviews this Policy at least annually, and communicates its substance to relevant business partners through its separate Code of Conduct for Business Partners. Any coDesign employee, worker, or business partner may raise a concern about a possible human rights violation through coDesign's Business Ethics Policy grievance mechanism, without fear of retaliation.

1. Child Labor and Young Workers

coDesign complies with the U.S. Fair Labor Standards Act (FLSA) and applicable state child labor laws governing the minimum age of employment and the hours and conditions under which minors may work. coDesign does not employ any person younger than 16, or younger than 18 for any hazardous occupation, consistent with FLSA and ILO guidance, and never assigns a young worker night work, overtime, or hazardous duties that would interfere with their health, safety, or schooling.

2. Wages and Benefits

coDesign pays all employees at least the applicable minimum wage (and any legally required prevailing wage) plus any legally required overtime, and provides statutory benefits such as medical leave and other government-mandated entitlements. Wages are paid on time, in full, and in a manner that enables a decent standard of living, consistent with ILO-UNGC guidance.

3. Working Hours

coDesign limits regular workweeks to the maximum permitted by applicable law, and in no case to more than 48 regular hours plus legally permitted overtime, with a workweek restricted to 60 hours only in emergency situations. All overtime is voluntary, and every employee receives at least one full day off in every seven, consistent with Ethical Trading Initiative guidance based on ILO conventions.

4. Modern Slavery

coDesign strictly prohibits forced, bonded, indentured, or involuntary labor and human trafficking in any form, including retention of identity documents or exaction of work under threat of penalty. Employees are always free to leave their employment upon reasonable notice.



5. Ethical Recruiting

coDesign hires workers lawfully, fairly, and transparently. coDesign never charges recruitment fees to workers, never misleads or defrauds applicants about the nature of work, and never confiscates or withholds a worker's passport or government-issued identity documents. Every new hire receives written notice of their rights and responsibilities, in a language they understand, at the start of their employment.

6. Freedom of Association and Collective Bargaining

coDesign respects every worker's right to freedom of peaceful assembly and association, including the right to form or join a union and to engage in collective bargaining, without interference or retaliation, consistent with the National Labor Relations Act (NLRA) and ILO Convention No. 87.

7. Non-Discrimination and Harassment

coDesign prohibits discrimination or harassment based on race, color, sex, age, disability, national or ethnic origin, religion, sexual orientation, gender identity, political opinion, or any other protected characteristic, and provides equal pay for equal work. coDesign strictly prohibits harsh or inhumane treatment, including sexual harassment or abuse, corporal punishment, and mental, physical, or verbal coercion.

8. Women's Rights

coDesign is committed to the principle that women are entitled to equal political, economic, and social opportunity, consistent with the Convention on the Elimination of All Forms of Discrimination against Women, and takes active steps to ensure equal opportunity in hiring, pay, and advancement.

9. Diversity, Equity, and Inclusion

coDesign is committed to building an inclusive workplace and project workforce that reflects the communities where we work. Our approach to design and construction is human-centered — we believe the same principle that shapes the spaces we build should shape our own team: that people do their best work, and clients get the best outcomes, when a range of backgrounds, perspectives, and experiences are represented and valued at every level of the organization.

10. Rights of Minorities and Indigenous Peoples

Where coDesign's projects may affect the rights or living conditions of local communities, minorities, or indigenous peoples, coDesign respects their right to decent living conditions and, where relevant developments affect lands on which they live, to Free, Prior, and Informed Consent (FPIC), with particular consideration for vulnerable groups.

11. Land, Forest and Water Rights and Forced Eviction

coDesign avoids forced eviction and the uncompensated deprivation of land, forests, or water in connection with the acquisition, development, or use of land for our projects.



12. Use of Private or Public Security Forces

Where coDesign or its projects engage private or public security personnel (for example, jobsite security), coDesign requires that such personnel are properly trained and controlled so that their deployment does not result in human rights violations.

Training

coDesign trains employees on this Human Rights and Working Conditions Policy, covering employment rights, equality/diversity/non-discrimination, and how to identify and report potential human rights violations, as part of onboarding and on a periodic refresher basis.

Policy Governance and Approval

This Policy is reviewed at least annually by coDesign senior management and updated as needed to reflect changes in our operations, applicable law, and industry guidance, including the Global Automotive Sustainability Guiding Principles. This Policy is communicated to all coDesign employees and is available to clients and business partners upon request.

