



## ***Gates Industrial Corporation plc***

### ***Human Rights Policy***

Gates Industrial Corporation plc and its relevant affiliates (“Gates” or the “Company”) are committed to upholding the human rights of all people, and treating each individual with dignity and respect. Gates believes in the principles of equality and non-discrimination and works to use its influence and business relationships to promote the opportunity for all people throughout Gates’ value chain to exercise and enjoy their fundamental human rights. Gates does so in accordance with Gates’ commitment to the general principles of the UN Global Compact.

This Human Rights Policy outlines Gates’ commitment to fundamental human rights. This policy is guided by the UN Guiding Principles on Business and Human Rights (UNGPs), the International Bill of Human Rights, including the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social, and Cultural Rights; and The ILO Declaration on Fundamental Principles and Rights at Work. Gates further communicates its commitment to human rights to its employees and the public via Gates’ Code of Business Conduct and Ethics, which is available in 20 languages, as well as Gates’ Supplier Code of Conduct, its Health, Safety, and Environmental Policy, and its diversity and inclusion policies and programs.

#### **Scope of Commitment**

This Human Rights Policy applies to all employees of the Company, including part-time and temporary workers as well as independent contractors. As a company, Gates abides by the laws in the markets where Gates operates. Where local laws are less stringent than Gates’ policies and internationally recognized human rights and employment standards, Gates is guided by the more stringent policies and standards, and encourage its suppliers to follow these standards and principles. Gates also expects its co-manufacturers and independent suppliers to share Gates’ commitment and standards by adopting similar policies and upholding these values within their business operations and, where possible, Gates works with them to develop the capacity to do so. Gates’ Supplier Code of Conduct further reinforces and clarifies this commitment.

#### **Focus and Salient Issues**

Gates is committed to respecting all internationally recognized human rights, and its management policies and ongoing procedures cover the breadth of these rights, principles and related issues. Gates’ approach to human rights starts with understanding how Gates’ products, business activities and operations may impact rightsholders, both positively and negatively.

Gates has identified the following human rights issues as being most salient to its business (in alphabetical order):

- Access to mechanisms for reporting concerns
- Appropriate wages and benefits
- Climate change
- Equal opportunity for all
- Freedom of association
- Health and safety
- Involuntary labor and human trafficking
- Underage labor

Gates recognizes that some groups may be at greater risk of negative human rights impacts due to their vulnerability or marginalization. Furthermore, while Gates strives to support these issues through general programs and policies, Gates realizes that, to fully address these issues, Gates may implement different types of support, strategies for remediation, or access to mechanisms for reporting concerns for different groups or circumstances.

Finally, Gates recognizes that other issues may grow in importance over time. Gates remains steadfast in its commitment to identify these issues and take appropriate actions to respond to potential human rights risks.

### **Prevention of Involuntary Labor**

Gates will not use any form of forced, bonded, indentured or prison labor or engage in any form of human trafficking. All work done for Gates must be voluntary, and employees shall be free to leave work or terminate their employment with Gates at any time, with reasonable notice if required under local law. Gates will ensure that third party agencies providing labor are compliant with the provisions of this Policy and applicable regional and local laws and regulations.

### **Prevention of Underage Labor**

The minimum age for employment or work at Gates shall be 15 years of age, the minimum age for employment applicable for Gates' industry in any relevant country, or the age for completing compulsory education in any relevant country. Gates may employ juveniles who are older than the applicable legal minimum age for employment but are younger than 18 years of age, provided they do not perform work likely to jeopardize their health, safety, or morals, consistent with ILO Minimum Age Convention No. 138.

### **Equal Opportunity for All**

Gates is firmly committed to the equitable treatment of all of its employees and qualified applicants for employment. Equal opportunity in all aspects of employment is one of Gates' most basic beliefs and the Company will not tolerate any illegal discrimination, harassment or retaliation against any worker based on age, race, color, sex, sexual orientation, gender identity or expression, transgender status, religion, national origin, ancestry, citizenship, disability, veteran or marital status, genetic information, pregnancy, childbirth or related medical conditions, or any other applicable status protected by national, state or local law. These equal opportunity principles are applied to all hiring and employment practices, including applications for employment,



promotions, rewards, access to training, job assignments, wages, benefits, discipline and termination, and are more fully described in Gates' Code of Business Conduct and Ethics, located on the Company's webpage at [gates.com](http://gates.com).

Gates' commitment to providing equitable treatment extends to dealings with employees, customers, suppliers, and all other business contacts. Gates will not tolerate or condone illegal harassment whether engaged in by co-workers, supervisors, customers, or other non-employees who conduct business with the Company.

### **Wages and Benefits**

Gates pays all of its employees at least the minimum wage required by the applicable laws and regulations in the countries in which it employs individuals, and provides all legally mandated benefits. In addition to their compensation for regular hours of work, Gates compensates its employees for overtime hours at the rate required by such applicable laws and regulations. Gates pays its employees in a timely manner, and the basis for payment is clearly conveyed to them in a timely manner.

Gates offers vacation time, leave periods, and holidays consistent with the applicable laws and regulations in the countries in which it operates. Gates is committed to workweeks that do not exceed the maximum permitted under such applicable laws and regulations.

### **Freedom of Association**

Gates respects the rights of its workers to associate freely, form and join (or not join) workers' organizations of their own choosing, and seek representation and bargain collectively, as permitted by applicable laws and regulations. Gates also prohibits acts of interference with the establishment, functioning, or administration of workers' organizations, in accordance with applicable laws and regulations.

### **Health and Safety**

Gates recognizes that integrating sound health and safety management practices into all aspects of business is essential to maintaining high morale and producing innovative products. Gates is committed to creating a safe and healthy work environment for all of its employees. Gates policies and practices regarding employee health and safety are more fully described in its Health, Safety and Environment Policy, located on the Company's webpage at [gates.com](http://gates.com).

### **Supplier Requirements**

Gates conducts due diligence throughout its business to proactively assess, identify, prevent and mitigate actual and potential adverse human rights impacts to stakeholders across Gates' value chain. Gates suppliers are required to adhere to the Gates Supplier Code of Conduct. As provided in its Supplier Code of Conduct, Gates requires that working conditions in the Gates' supply chain are safe, and that workers are treated with respect and dignity. All Gates suppliers are obligated to operate in full compliance with the laws, rules and regulations of the countries in which they

operate. When adverse human rights impacts are uncovered due to Gates' business activities or from linkages to its operations, Gates is committed to taking timely and transparent action to remediate in a fair and equitable manner in line with the UNGPs.

### **Whistleblower Protections and Anonymous Reporting**

Gates Suppliers should create programs to ensure the protection of whistleblower confidentiality and prohibit retaliation against workers who participate in such programs in good faith. Suppliers shall provide a mechanism for workers to report workplace concerns anonymously in accordance with local laws and regulations.

If a Gates employee, Supplier or any other third-party believes that actions have taken place, may be taking place, or may be about to take place (whether by a Gates employee, a Gates Supplier, or any other third party acting on Gates' behalf) that violate this Human Rights Policy, the Supplier Code of Conduct, Gates' Code of Business Conduct and Ethics, any other Gates policy, or any applicable legal or regulatory requirement, that individual is encouraged to bring the matter to the attention of Gates by one of the following methods:

- (a) in writing to Gates Industrial Corporation plc, Attn: Audit Committee/General Counsel, 1144 Fifteenth St., Suite 1400, Denver, Colorado 80202;
- (b) by sending an e-mail to [compliance@gates.com](mailto:compliance@gates.com);
- (c) by calling (toll free) the number appropriate to the applicable language or location listed on Annex A to Gates' Code of Business Conduct and Ethics (available on [gates.com](http://gates.com)) or as found on [gatescorp.ethicspoint.com](http://gatescorp.ethicspoint.com); or
- (d) by accessing the web portal of Gates' third party provider at [gatescorp.ethicspoint.com](http://gatescorp.ethicspoint.com) or the web portal of any successor third party provider as may be approved from time to time by Gates.

### **Governance and Accountability**

Respect for human rights is an integral part of Gates' values and global sustainability strategy. Gates reports on its progress against its efforts in Gates' annual Sustainability Report as well as on [gates.com](http://gates.com). Management of human rights is the responsibility of Gates' executive and senior leadership teams across all of Gates' business lines and the globe. Ultimate oversight for human rights resides with the Nominating and Governance Committee of Gates' Board of Directors.



Ivo Jurek  
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Gates Industrial Corporation plc