



## HUMAN RIGHTS POLICY

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## I. PURPOSE

CECO Environmental Corporation and its subsidiaries (“CECO” or “Company”) respects and acknowledges internationally recognized human rights principles and is committed to treating all people with dignity and respect. The purpose of this Human Rights Policy (“Policy”) is aligned with CECO’s objective to maintain effective corporate policies which, among other things, provide an overview of expectations for CECO Personnel (defined below). In addition, this Policy exists to:

- Inform CECO Personnel, business partners, vendors, suppliers and customers of CECO’s commitment to human rights;
- Establish CECO’s respect for human rights through on-going human rights due diligence;
- Maintain CECO’s high ethical standard; and
- Contribute to the realization of human rights globally.

## II. SCOPE

This Policy applies to CECO Personnel worldwide, as well as to CECO’s external agents, business partners, vendors, and suppliers, to which Company’s Supplier Code of Conduct applies.

This Policy is overseen by CECO’s Board of Directors, Chief Executive Officer, and Senior Vice President of Human Resources.

## III. DEFINITIONS

TERM	DEFINITION
child	Any person under the minimum legal age for employment under applicable law where the work is performed.
conflict minerals	Conflict minerals currently include the metals in tantalum, tin, tungsten, and gold, which are the extracts of the minerals cassiterite, columbite-tantalite, and wolframite, respectively.
human rights	Basic rights inherent to all human beings, regardless of nationality, place of residence, sex, gender, national or ethnic origin, color, religion, language, or any other status.
OECD	Organization for Economic Co-operation and Development
Personnel	Refers collectively to CECO directors, officers, and employees.
UN	United Nations

## IV. POLICY

Respect for human rights is a fundamental value of CECO. CECO’s aim is to help increase the enjoyment of human rights within the communities in which we operate, and the approach and this Policy are guided by:

- The UN Guiding Principles on Business and Human Rights;
- The UN Universal Declaration of Human Rights;
- The International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work; and
- The OECD Guidelines for Multinational Enterprises.

We use due diligence as a means to identify and prevent human rights risks to people in our business and value 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.

We recognize that governments are ultimately responsible for establishing the legal framework to protect human rights within their jurisdictions. Central to CECO’s respect for human rights is our commitment to the rule of law and to compliance with the law wherever CECO operates. CECO expects its business partners, both internal and external, to have the same commitment.

Consistent with the principles set forth in our Code of Business Conduct and Ethics and our Supplier Code of Conduct, as is detailed below, through this Policy CECO:

- Prohibits forced labor, child labor, discrimination, and harassment;
- Works to establish safe and healthy working conditions;
- Promotes diversity, which is a value critical to CECO's business strategy; and
- Requires the provision of fair and equitable wages, benefits, and other conditions of employment, in accordance with recognized human rights and applicable laws.

#### **A. Salient Risks**

The Company is committed to respecting all internationally recognized human rights and our management policies and ongoing procedures cover the breadth of these rights, principles and related issues. Our approach to human rights starts with understanding how our products, business activities and operations may impact stakeholders, both positively and negatively. We focus on the human rights issues that are most salient to our business. Among the broader human rights issues we identified, our saliency process prioritized the lettered items detailed below.

#### **B. Community and Stakeholder Engagement**

We recognize that CECO is part of the communities in which it operates. We engage with communities on human rights matters that are important to them, such as access to clean water and air. We also engage with people in those communities, including vulnerable and disadvantaged groups. Our aim is to ensure, through dialogue, that we are listening to, learning from, and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level. Where appropriate, CECO engages with a wide range of civil society and stakeholders on human rights issues related to its business.

#### **C. Implementation and Training**

Training is an important part of effective human rights practices. CECO therefore undertakes efforts to build awareness about this Policy and related procedures; specifically, CECO ensures employees are aware of this Policy through its annual training program.

#### **D. Diversity, Equity and Inclusion**

CECO encourages diversity, is receptive to diverse opinions, promotes equal opportunity for all, and fosters an inclusive and ethical culture. We value and advance the diversity, equity, and inclusion of the people with whom we work. CECO is committed to protecting the rights of all employees, including women and underrepresented groups, is committed to equal opportunity and is intolerant of discrimination, bullying, and harassment. We work to maintain workplaces that are free from discrimination, bullying, and 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.

#### **E. 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, bullying, or harassment. Where employees are represented by a legally-recognized union, we are committed to establishing a constructive dialogue with their freely-chosen representatives. CECO is committed to bargaining in good faith with such representatives.

## **F. Safe and Healthy Workplace**

The safety and health of our employees is a critical priority. CECO's 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.

## **G. Workplace Security**

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

## **H. Forced Labor and Human Trafficking**

CECO believes that the employment relationship should be voluntary, and terms of employment must comply with applicable laws and regulations. We therefore 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.

## **I. Child Labor**

We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required. CECO further prohibits illegal child labor.

## **J. Immigration**

CECO ensures that all employees who work for CECO are duly authorized to do so.

## **K. Right to Water**

We recognize the right to water as a fundamental human right. We respect the human need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation.

## **L. Work Hours, Wages, and Benefits**

We compensate employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime, and benefits laws.

## **M. Conflict Minerals**

CECO strives not to use conflict minerals throughout its supply chain, the obtainment of which, especially when extracted in certain regions, is linked to human rights violations. CECO abides by conflict mineral reporting requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act and of the Securities Exchange Commission.

## **N. Environment**

CECO operates in a manner that actively manages risk, conserves natural resources, and protects the environment. We believe in applying environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss, and opportunities for business growth through operational and product

stewardship. CECO complies with all applicable environmental, health, and safety laws, regulations, and directives, including laws and international treaties relating to waste disposal, emissions, discharges, and hazardous and toxic material handling. We believe in protecting the health, safety, and welfare of CECO Personnel, visitors, and others who may be affected by our business activities.

## O. Guidance and Reporting

We strive to create workplaces in which open and honest communications among all Personnel are valued and respected. CECO is committed to comply with applicable labor and employment laws wherever CECO operates.

Personnel who believe there is a conflict between the language of this Policy and the laws, customs, and/or practices of the place where he or she works, who has questions about this Policy, or would like to confidentially report a potential violation of this Policy, should raise those questions and concerns with local management, Human Resources, or the Legal Department. Employees can also report suspected policy violations through the Compliance Hotline secured internet website at <http://www.convercent.com/report> or by calling the appropriate toll-free number for their location, as follows:

US/Canada: 1-800-461-9330  
International (call collect): 1-720-514-4400

No reprisal or retaliatory action will be taken against Personnel for raising concerns under this Policy. The Company will investigate, address, and respond to concerns and will take appropriate corrective action in response to any violation.

For individuals in the European Union: Please note that, due to EU legislation, the Compliance Hotline phone or web services only allow for reporting of financial, accounting, and auditing matters. To report issues under the Human Rights Policy, contact your local Management, Human Resources Director, or the Legal Department ([legal@onececo.com](mailto:legal@onececo.com)).

## V. RELEVANT TOOLS AND RELATED POLICIES

1. *Employee Handbook*
2. *Code of Business Conduct and Ethics*

This policy can be found via the Company's internet site: <https://www.cecoenviro.com/esg>

## VI. RESPONSIBILITY, REVISION HISTORY, AND APPROVALS

### A. Responsibility for Policy and policy adherence

Policy Owner	Policy Owner Title	Policy Group	Policy Number	Policy Name
Pam Turay	SVP Human Resources	Human Resources	HR-3002	Human Rights Policy

### B. Revision/review date

Last date	Review	Changes or Revisions	Next Review Due	Nature of revisions	Reviewed by/ revised by
New		N/A	05/30/2022	N/A	New

**C. Approval**

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Approver Title HR Director

Approver Signature Annemarie Tuinstra

DocuSigned by:  
*Annemarie Tuinstra*  
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Final Approver Title SVP Human Resources

Final Approver Signature Pam Turay

DocuSigned by:  
*Pam Turay*  
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