

UKG Human Rights Policy 2024

At UKG, our purpose is people™. We have a people-centered culture that seeks to empower and inspire people to greatness so we can care for each other, our families, our communities, and our customers. Foundational to this purpose is our commitment to respecting fundamental human rights and embedding this commitment in the way we do business.

We firmly believe in doing the right thing and our core values—United, Kind, and Growing—are a unifying framework for how we operate our business throughout the world, including as it relates to human rights.

This Policy, with our Employee Handbook, Code of Business Conduct and Ethics, and [Third Party Code of Conduct](#), articulates our commitment to respect human rights across our operations, products, and communities.

Thank you.



Jennifer Morgan, CEO | UKG

1. Scope of Our Commitment

At UKG, we commit to respecting internationally recognized human rights in our operations, which includes our employees and those in our supply chain, in our products, and in our communities. This commitment is informed by our adherence to the [United Nations Guiding Principles on Business and Human Rights](#) (UNGPs). This means we aim to respect the rights of all individuals affected by our business and will work to address any adverse impacts that we may cause or to which we may contribute. It also means that we seek to mitigate adverse human rights impacts that are directly linked to our operations, products, or services by our business relationships with third parties, including those in our supply chain such as suppliers, vendors, partners, and other third parties (collectively, “Third Parties”). We also believe that we can serve as a catalyst for action by our Third Parties.



In addition to the UNGPs, we also commit to adhering to the following international principles and standards:

- ❖ [The International Bill of Human Rights](#) (including the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights);
- ❖ [The International Labour Organization’s \(ILO\) Declaration on Fundamental Principles and Rights at Work](#) and core [International Labour Standards](#);
- ❖ [The Organisation for Economic Cooperation and Development \(OECD\) Guidelines for Multinational Enterprises](#);
- ❖ [The UN Convention on the Rights of the Child](#);
- ❖ [The UN Declaration on Human Rights Defenders](#);
- ❖ [Framework Principles on Human Rights and the Environment](#); and
- ❖ [The Ten Principles of the UN Global Compact](#).

We expect our employees and Third Parties to respect human rights in a manner that is consistent with this Policy.

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We comply with applicable national laws. Where local laws are more rigorous than this Policy, we will adhere to the stricter of the standards. In situations where international human rights standards and the commitments outlined in this Policy exceed national laws, we will seek to align our operations with international standards in ways that respect national laws.

2. Due Diligence

We are committed to ongoing human rights due diligence in accordance with the UNGPs. This means we seek to surface and mitigate actual and potential human rights-related risks, including through engagement with internal and external stakeholders. We will complete a company-wide saliency assessment every three years and are committed to continually enhancing our Third-Party assessments, product-level assessments, and risk-based downstream due diligence processes to ensure they are consistent with our commitment and industry best practices.

3. Our Focus

As a technology company focused on workforce management and human capital solutions, we recognize that we must respect all internationally recognized human rights. The following, however, are priority areas of focus given our business:



Operations

We are better together. Respecting human rights is core to our operations, this includes our employees' rights and the rights of individuals working with our Third Parties.

Our employees (U Krewers): We take great pride in our award-winning workplace culture and values. Our Employee Handbook and Code of Business Conduct and Ethics describe our expectation that our employees treat everyone with dignity and respect; we will not tolerate discriminatory treatment or harassment. We are committed to equal employment opportunity, pay equity, and advancing diversity, equity, and belonging. Our Code also articulates our commitment to honest and ethical conduct and fair dealing, anti-bribery and corruption, and to abiding by modern slavery prevention laws. We commit to providing a healthy and safe workplace for U Krewers and taking steps to ensure their safety while travelling in the course of their duties. We also believe in the right to free association and regularly engage in dialogue with our employees.

These commitments are complemented by comprehensive, market-leading programs and benefits that support U Krewers, their families, and their communities.

Our Third Parties: We expect Third Parties to be united with us in the commitments outlined in this Policy and we will support them in meeting these commitments. We believe in developing and maintaining a culture where our Third Parties support and practice our values, including abiding by our [Third Party Code of Conduct](#). That Code outlines our expectations regarding important areas, including human rights, anti-discrimination, modern slavery prevention, union membership, fair treatment, compensation and working hours, anti-corruption and gifting, confidentiality, intellectual property rights, privacy, grievance channels and non-retaliation, workplace safety, environmental responsibility, health and safety training and communication, and responsibly sourced materials.

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We take a risk-based approach to the responsible management of our supply chain, and we actively engage in monitoring and third-party assessments to ensure compliance with the Third-Party Code and other international standards. We believe in the value of continuous improvement. When a Third Party in our supply chain falls short of our expectations, we will support them through mutually agreed action plans and capacity building or discontinue that relationship where appropriate.



Products & Customers

We will do the right thing. We strive to build trustworthy and innovative products that empower our customers' employees to reach their professional potential without causing harm. It is our intention that our passion for workforce management will create meaningful work experiences, encouraging better outcomes for all. Respecting the human rights of our customers is critical to earning this trust and fulfilling our purpose.

While we fundamentally believe in the positive impacts of our products, we strive to mitigate and minimize the risks of adverse impacts and the potential misuse of our technology. For UKG, this means we prioritize data privacy, accessibility, mitigating bias, transparency and consent, and technology impacts on livelihoods and the future of work. We also believe in the ethical use of artificial intelligence and other automated technology in our products to ensure that these systems are robust, lawful, respect human autonomy and fairness. We integrate privacy, human rights, and responsible innovation considerations into our software development lifecycle in order to mitigate potential adverse impacts at all stages of design, deployment and use. [Our Privacy Notice](#) outlines our approach to protecting personal information. We carry out product-level privacy, protection, and security assessments.

Our [Acceptable Use Policy](#) seeks to ensure our products and services are not used for any illicit, harmful or offensive activities, or to undermine people's workplace, livelihood, and non-discrimination rights.

We are committed to ensuring digital accessibility for people with disabilities. We are continually improving the user experience for everyone and integrating accessibility into our Software Development Life Cycle.



Community & Society

We can make an impact. We strive to be a force for good and accountable to our community. We believe we can make important contributions and be a thought leader on the future of work.

Giving is core to our culture and we're committed to serving our communities. We partner with a variety of nonprofits, participating in philanthropic projects and providing charitable support worldwide aligned with our values and purpose.

We recognize that climate change presents a challenge to the full enjoyment of various human rights and exacerbates existing poverty, conflict, and inequality. We are committed to mitigating climate change and doing business with respect for the right to a clean, healthy, and sustainable environment. Our approach is outlined in our [Global Environmental Policy](#).

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4. Integration

The commitments outlined in this Policy will be integrated on an ongoing basis into the way we do business. These efforts will be resourced appropriately based on the findings of our ongoing human rights due diligence. We will engage in meaningful dialogue with external stakeholders, including those in our local communities, and communicate this Policy and our [Third-Party Code](#). We will carry out human rights training for relevant employees and integrate respect for human rights into relevant policies, processes, and contracts.

5. Remedy

We are committed to maintaining an environment where candid communications are the expectation, not the exception. We see mechanisms for reporting concerns as an important tool for identifying potential impacts. We maintain a secure and confidential third-party hotline where we encourage the reporting of any violations of this Policy, our [Code of Business Conduct and Ethics](#), or any other integrity concerns. Reports may be made anonymously to the maximum extent permitted by local law. This hotline is open to all and UKG prohibits retaliation against anyone who raises a concern, question, or complaint in good faith. We will not obstruct access to judicial and non-judicial, third-party mechanisms.

We respect the crucial work done by human rights defenders—defined as anyone who identifies or reports a human rights concern—to strive for the realization of human rights around the world and value their input. We neither tolerate nor contribute to threats, intimidation, and attacks against human rights defenders and expect our Third Parties to make this same commitment.

Reported concerns specifically related to human rights are handled by the Environmental, Social & Governance (ESG) team at UKG. UKG takes all concerns that it receives seriously and will respond with urgency and care. We are committed to addressing or effectively remediating instances where we have caused or contributed to adverse human rights impacts. We are also committed to working with our Third Parties to remedy adverse impacts to which we may be directly linked.

6. Governance

Our Company-wide approach to respecting human rights is part of UKG's ESG Program, which is overseen by our Board of Directors with executive accountability to UKG's Chief Legal Officer. UKG's ESG team is responsible for the day-to-day management of the ESG Program and the implementation of this Policy.

We will transparently report on our implementation of this policy, our salient risks, and our efforts towards continuous improvement, through our ESG report, [Modern Slavery Statement](#), and on UKG.com.

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7. Questions about this Policy?

- ✓ Contact UKG Compliance at ComplianceOfficer@ukg.com



8. Reporting Concerns

- ✓ If you know or suspect that this Policy has been violated, report it promptly to ComplianceOfficer@ukg.com or the [UKG ReportingLINE](#) (reports may be made anonymously where permitted by local law).

9. Version History

Version #	Version Date	Effective Date	Policy Owner	Approver	Audience
1.0	August, 2021	November 01, 2021	People Solutions/Legal	Peter Acton, VP Deputy GC	All UKG employees
1.1	May 2023	June 30, 2023	Legal/Compliance	Peter Acton, VP Deputy GC	All UKG employees
1.2	May 2024	June 30, 2024	Legal/Compliance	Peter Acton, GVP Deputy GC	All UKG employees