



Human Rights Policy

Version 1

Revised: 12/10/2021

Internal Use Only

This document is confidential and designed for use by Epiq personnel. The contents may be shared with other personnel but may not be copied nor shall the document remain on the premise of any party other than Epiq without a valid Nondisclosure Agreement.

Human Rights Policy

Purpose

The purpose of this policy is to:

- 1) Outline Epiq's commitment to meet its responsibility to respect internationally recognized human rights standards set out in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labor Organization's Declaration of Fundamental Principles and Rights at Work;
- 2) Lay out Epiq's expectations of associates, business partners, and other relevant parties; and
- 3) Provide information on how Epiq complies with all applicable and internationally recognized human rights.

Scope

This human rights policy reflects our company's understanding of its responsibility to support and respect the protection of internationally proclaimed human rights and ensuring that we are not complicit in human rights abuses. It also:

- Provides a basis for embedding the responsibility to respect human rights through all business units and functional areas.
- Responds to relevant internal and external stakeholders.
- Elaborates on the company's commitment to respect and support human rights.
- Demonstrates international good business practice.

This Policy applies to Epiq and its personnel, all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. For recent acquisitions to Epiq, this policy applies once the integration is complete.

Compliance with this policy is mandatory. If any employee believes that someone is violating the Human Rights Policy, they are hereby asked to report it immediately to their manager, human resource business partner or the Epiq Integrity Hotline.

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Epiq's Corporate Responsibility to Respect Human Rights

The responsibility to respect human rights is a global standard of conduct for all businesses wherever they operate. Epiq commits to:

- Having policies, processes, and procedures to identify, prevent, mitigate, and account for how we address our impacts on human rights;
- Addressing its human rights impacts and taking adequate measures for their periodic review: prior to a new business activity or relationship, prior to major decisions or changes in operations (market entry, product launch, policy change, wider changes to the business), in response to or in anticipation of changes in operating environment/political climate;
- Avoiding causing or contributing to adverse human rights impacts through our own business activities and addressing such impacts when they occur;
- Preventing or mitigating (or remediating as necessary) adverse human rights impacts that are directly linked to our operations, products or services or using our leverage where we have the ability to effect change in the wrongful practices of another entity in our control;
- Tracking the effectiveness and driving continuous improvement of our human rights responses based on qualitative and quantitative indicators as well as feedback from internal and external stakeholders.
- Having an operational grievance mechanism directly accessible by individuals and communities across all our global locations.

Modern Slavery and Human Trafficking

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, indentured or forced and compulsory labor and human trafficking, that deprives a person's liberty by another in order to exploit them for personal or commercial gain. Pursuant to our [Anti-Slavery and Human Trafficking Statement](#), Epiq has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, as well as to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Child Labor

The Company does not employ persons under the age of sixteen (16). Individuals under the age of 18 (interns, mentoring program participants) may work for Epiq under limited circumstances as set forth by state and federal laws, and such employment must be approved in advance by management.

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Responsibilities

Roles	Responsibilities
Board of Directors	<ul style="list-style-type: none">Overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it
Compliance/CSR Team	<ul style="list-style-type: none">Primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering human rights abuses
Management	<ul style="list-style-type: none">Responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of human rights
Employees	<ul style="list-style-type: none">Comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to CSR@epiglobal.com

Policy review

This policy is reviewed at least annually. The annual policy refresh is completed by Corporate Social Responsibility/Compliance team and approved by the Chief Legal Officer. Minor updates to the policy can also be requested by the business throughout the year and can be approved and implemented by the Compliance team.

Enforcement

Suspected or known violations of this policy may result in:

- Accountability for conduct under any applicable Epiq corporate policies, procedures, or contractual obligations, including disciplinary action up to and including termination of employment
- Prosecution under applicable statutes
- Suspected or known violations of Local, State, National and International law will be processed by the appropriate Epiq authority and/or law enforcement agencies.

In addition, we may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

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Document Control

Version	Date Published	Author	Description
1.0	December 7, 2021	Kate Stark	Human Rights Policy- Draft
1.0	December 10, 2021	Alison Wisniewski	Human Rights Policy- Approval