

HUMAN RIGHTS POLICY

Atlantic Sapphire believes that it is fundamental to its business to respect and protect human rights. We also believe that, as a business, we can positively impact human rights.

Through Atlantic Sapphire's compliance with applicable laws and regulations and Code of Conduct, together other company policies, we are committed to conducting our business ethically and upholding the highest standards of ethics and good business practices. This policy is aligned with Atlantic Sapphire's Code of Conduct.

Atlantic Sapphire respects internationally recognized human rights as established in the Universal Declaration on Human Rights and the International Labor Organization's Core Conventions. Human Rights is an area of importance to our employees, workers, shareholders, investors, customers, consumers, the communities in which we operate and civil society groups.

Objectives

The objectives of this policy are as follows:

- Reaffirm and inform employees, business partners and customers of Atlantic Sapphire's commitment to human rights.
- Establish a policy for Atlantic Sapphire's consistent reevaluation of its human rights policies.
- Maintain Atlantic Sapphire's high ethical standards.
- Participate and make a meaningful contribution to human rights in a larger context, including in the communities in which we operate.

Scope

Atlantic Sapphire's Human Rights Policy applies to all Atlantic Sapphire employees, anyone doing business for or with Atlantic Sapphire and others acting on Atlantic Sapphire's behalf.

While this Human Rights Policy draws from a variety of legal principles, it primarily draws on foundations and principles established by the United Nations Global Compact and applicable labor laws and regulations.



Responsible Sourcing

Atlantic Sapphire has a large and diverse extended supply chain. In addition to the standards set forth in our Code of Conduct that suppliers must abide by to do business with Atlantic Sapphire, we are committed to working only with suppliers who comply with our Code of Conduct.

Our suppliers must be transparent about their business and labor practices and work to remedy any shortfalls.

Diversity

At Atlantic Sapphire, we value having diverse employees as it leads to diverse contributions and improves our business and strategies. Atlantic Sapphire is committed to equal employment opportunities and does not tolerate discrimination and harassment in the workplace. Atlantic Sapphire does not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace.

Atlantic Sapphire is committed to maintaining a workplace free from discrimination or harassment based on race, sex, color, national or social origin, religion, age, disability, sexual orientation, political opinion or any other status protected by applicable laws.

These principles apply not only to Atlantic Sapphire employees, but also to the business partners with whom we work.

In pursuit of these goals, Atlantic Sapphire:

- Selects employees and contractors on the basis of qualification, experience and past performance;
- Provides equal opportunity to all employees and applicants for employment without regard to race, creed, color, national origin, religion, ancestry, gender, sexual orientation, gender identity, marital status, familial status, or any other basis protected by federal, state, local law and international conventions;
- Respects the personal rights and dignity of all employees, and will not tolerate sexual harassment in any form;

Work Hours, Wages and Benefits

Atlantic Sapphire compensates employees competitively relative to the industry and the local labor markets. We operate in full compliance with applicable wage, overtime and benefits laws. In addition, Atlantic Sapphire operates in full compliance with applicable work hours and regulations as defined by applicable laws in the jurisdictions in which we operate.

Open Communication

Atlantic Sapphire encourages open communication with employees and community, and provides processes for reporting any matters of concern. Any employee who believes a conflict arises between the language of the policy and the laws, customs and practices of the place where he or she works, or 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, Head of Legal, or by writing to forum@atlanticsapphire.com. No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

Development and Growth

Atlantic Sapphire, as part of our core values, encourages continuous learning and encourages employees to increase and enhance their skills. Atlantic Sapphire provides opportunities for employee advancement with regards to the employees' desires and qualifications and the company's business needs. Additionally, Atlantic Sapphire provides relevant education, training and guidance resources on an ongoing basis.

Safe and Secure Working Conditions

Atlantic Sapphire is committed to providing its employees with a safe and healthy workplace. In furtherance of this goal, Atlantic Sapphire complies with applicable safety and health laws, regulations and internal requirements. We are committed to maintaining a productive workplace by minimizing the risk of accidents, injury and exposure to health risks.

Atlantic Sapphire is also committed to maintaining a workplace free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provide as needed and will be maintained with respect for employee privacy and dignity.

Atlantic Sapphire is committed to engaging with our employees to continually improve health, safety and security in the workplace. In addition, Atlantic Sapphire complies with the International Finance Corporation's (IFC) Performance Standard 2 regarding labor and working conditions.

Freedom of Association

Atlantic Sapphire respects our employees' right to join or form unions without fear of reprisal, intimidation or harassment. Where a legally recognized union represents employees, we are committed to establishing a constructive dialogue with their freely chosen representative.]

Forced Labor and Human Trafficking

Atlantic Sapphire prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of human trafficking.

Child Labor

Atlantic Sapphire is committed to the abolition of child labor and all forms of forced or compulsory labor.

Atlantic Sapphire prohibits the hiring of individuals under the legal age of employment in the relevant jurisdiction and under the age of 18 for positions in which hazardous work is expected.

Compliance

Employees and suppliers are expected to comply with this Human Rights Policy and all applicable Atlantic Sapphire policies.

Violation of this policy or the refusal to cooperate will result in disciplinary action, up to and including termination and referral to the appropriate authorities. Where Atlantic Sapphire has reasonable belief that any supplier or partner infringes or violates human rights, we reserve the right to cease such relationship immediately.

As such, employees and suppliers are expected to:

- Never infringe on human rights.
- Be alert to any evidence of human rights infringements in our direct operations or in the operations of our business partners and report any situation in which a human rights infringement is suspected.

Public Reporting

We report to the public on our human rights-related commitments, efforts and statements, consistent with this Human Rights Policy, as part of our annual ESG Report. This reporting cross references the UN Guiding Principles Reporting Framework.