

# **DMT Solutions Global Corporation d/b/a BlueCrest Global Human Rights Policy (Updated March 13, 2026)**

## **1. Purpose**

BlueCrest is committed to respecting the inherent dignity and equal rights of all people. This policy sets out our global standards to prevent human rights abuses, promote decent work, and ensure safe, healthy, and inclusive workplaces across our operations and value chain. It aligns our commitments with the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, including the 2022 amendment recognizing a safe and healthy working environment as a fundamental right, and with the UN Guiding Principles on Business & Human Rights (UNGPs).

## **2. Scope and Applicability**

This policy applies to all employees, officers and directors of BlueCrest worldwide. We expect suppliers, contractors, distributors, agents, labor brokers, and other third parties (collectively, 'business partners') to apply equivalent standards and to cascade them to their own supply chains.

## **3. Policy Statement and Core Commitments**

BlueCrest supports conduct consistent with the following five core ILO principles and commits to respect, promote and realize them throughout our operations and business relationships:

- Freedom of association and the effective recognition of the right to collective bargaining;
- The elimination of all forms of forced or compulsory labor;
- The effective abolition of child labor;
- The elimination of discrimination in respect of employment and occupation; and
- A safe and healthy working environment.

We support these commitments by taking reasonable steps to identify and address potential human rights risks in our operations and by monitoring and communicating our efforts in line with the UNGPs.

## **4. Key Definitions**

**Child:** For the purposes of this Policy, a 'child' is any person under 18 years of age. BlueCrest prohibits hazardous work for anyone under 18 and follows applicable law on minimum age

for employment, which must be no less than 15 (or higher where local law sets a higher minimum).

**Forced or compulsory labor:** All work or service exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily, including state-imposed forced labor and trafficking for labor exploitation.

**Recruitment fees and related costs:** Any fees or costs, direct or indirect, charged to workers during recruitment, placement, or employment. Under this Policy, workers shall not pay recruitment fees or related costs – the employer pays.

## **5. Standards and Specific Commitments**

### **5.1 Freedom of Association and Collective Bargaining**

We respect employees' rights to form, join, or refrain from joining lawful organizations, and to bargain collectively in accordance with applicable law. We foster open dialogue and worker engagement where unions are absent.

### **5.2 Prohibition of Forced Labor & Responsible Recruitment**

- No use of forced, bonded, indentured, trafficked or prison labor contrary to international standards.
- No retention, destruction or confiscation of workers' identity documents or other valuable personal items.
- No worker-paid recruitment fees or related costs at any stage; where such fees are identified, we provide remediation, including reimbursement.
- Transparent contracts in a language workers understand; no contract substitution.
- Freedom of movement and the right to terminate employment subject to reasonable notice and law.
- Enhanced protections for migrant workers, including prohibition on debt bondage and unfair deductions.

### **5.3 Child Labor and Young Workers**

- No hiring below the legal minimum age and never below 15.
- No hazardous work for anyone under 18.
- Robust age-verification and remediation procedures, including documented corrective actions; prioritize the best interests of the child, including education access.

### **5.4 Non-Discrimination, Equal Opportunity and Inclusion**

- Employment decisions based on qualifications, merit and business needs.
- Zero tolerance for discrimination, harassment or bullying based on protected characteristics, including race, color, ethnicity, national origin, sex, gender identity or expression, sexual orientation, disability, age, religion, veteran status, pregnancy, or any status protected by law.

- Commitment to reasonable accommodations for disabilities and for religious practices, consistent with law.

### **5.5 Safe, Healthy and Respectful Working Environment**

- Provision of a safe and healthy workplace, integrating hazard identification, risk assessment, training, and prevention.
- Management systems aligned to recognized OSH principles and continuous improvement; attention to physical safety, ergonomics, and mental health and well-being.
- Emergency preparedness, incident reporting, and corrective actions across operations and sites, including field and remote work.

### **5.6 Privacy and Data Protection**

- Protect personal data of employees, customers and stakeholders consistent with applicable laws (e.g., GDPR and relevant U.S. state privacy laws).
- Limit data collection to legitimate business purposes; ensure security controls, access limits and retention discipline.
- Transparency regarding monitoring technologies and AI-enabled systems impacting workers, with risk assessments and safeguards.

## **6. Implementation and Human Rights Due Diligence (UNGPs)**

- Governance: Board and senior management oversight. The General Counsel (or designee) owns this Policy and reports annually on implementation.
- Risk Assessment: Periodic salience-based human rights risk assessments covering own operations and supply chains.
- Integration & Action: Embed controls into procurement, sourcing, manufacturing, logistics, sales and HR processes; prioritize prevention and mitigation.
- Tracking: Metrics and internal audits to evaluate effectiveness; corrective and preventive actions documented.
- External Communication: Public reporting on salient risks and progress through modern slavery statements and sustainability disclosures, as required by law and best practice.

## **7. Supplier and Third-Party Expectations**

- Contractual requirements: Adhere to BlueCrest Supplier Code of Conduct and this Policy; cascade equivalent standards to sub-suppliers.
- Supply-chain mapping and risk screening: Focus on high-risk geographies, sectors, raw materials and labor corridors.
- Monitoring: Use of assessments, audits and worker-voice tools; no retaliation against workers participating in audits or grievance processes.

- Corrective action: Time-bound remediation plans; failure to remediate may result in suspension or termination of the relationship.
- Recruitment: Employer-pays principle; prohibit worker-paid fees and passport retention; require credible labor agencies and contracts.
- Trade compliance: For U.S.-bound goods, compliance with the Uyghur Forced Labor Prevention Act (UFLPA); for UK, Australia and Canada, prepare and publish statements as required by law.

## **8. Speak Up, Grievance and Non-Retaliation**

BlueCrest encourages employees and external stakeholders to raise concerns or potential violations via our ethics hotline, HR, or Legal. Reports may be made anonymously where permitted. We prohibit retaliation against anyone who raises a concern in good faith or participates in an investigation. We will provide, or cooperate in providing, access to remedy where we have caused or contributed to adverse impacts.

## **9. Reporting & Transparency**

BlueCrest complies with all applicable human rights, modern slavery, and forced labor reporting, disclosure, and documentation requirements in the jurisdictions in which it operates. Where required by law, we prepare, approve, and publish statements or maintain documentation to demonstrate compliance and support transparency across our operations and supply chain.

## **10. Compliance, Investigations and Discipline**

Violations of this Policy may result in disciplinary action up to and including termination of employment or contract, subject to local law. Business partners that violate this Policy must promptly remediate; failure to do so may result in termination of the relationship and potential reporting to authorities where required.

## **11. Related Policies and Documents**

- Code of Conduct
- Supplier Code of Conduct
- Equal Employment Opportunity and Anti-Harassment Policy
- Environmental, Health, and Sustainability Policy
- Personal Data Protection Policy

## **12. Effective Date and Review**

Effective as of the date above. This Policy will be reviewed at least annually and updated as needed to reflect evolving laws and best practices.

## **Annex: Key International Standards Referenced**

- ILO Declaration on Fundamental Principles and Rights at Work; 2022 amendment recognizing OSH as a fundamental right; Conventions 155 and 187.
- UN Guiding Principles on Business & Human Rights (UNGPs).
- ILO Minimum Age Convention (C138) and Worst Forms of Child Labour Convention (C182).
- ILO Protocol of 2014 to the Forced Labour Convention (P029) and related guidance.
- ILO General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs (2019).
- UK Modern Slavery Act 2015, Section 54 and statutory guidance.
- Australia Modern Slavery Act 2018 and guidance for reporting entities.
- Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (in force 2024).
- U.S. Uyghur Forced Labor Prevention Act (UFLPA) importer guidance and resources.