

Purpose

Berkowsky and Associates, Inc. is committed to conducting business with integrity, transparency, and respect for human rights. This Human Rights Policy establishes our commitment regarding opposition of and prevention of child labor, forced labor, and human trafficking in operations.

We are committed to upholding internationally recognized human rights, including the elimination of child labor, forced labor, and human trafficking, in alignment with the UN Guiding Principles on Business and Human Rights and ILO Standards.

Definitions

Child labor refers to work that deprives children of their childhood, education or dignity and that is harmful to their physical or mental development.

Forced labor occurs when people are made to work against their will through threats, violence, coercion, deception and abuse of power.

Human trafficking involves the recruitment, transportation, or control of people through force, fraud or coercion for the purpose of exploitation.

Scope

This policy applies to all activities conducted by or on behalf of Berkowsky. Clients, Suppliers and Subcontractors are expected to operate in a manner consistent with this policy.

Principles

We strictly prohibit the employment of individuals under the minimum legal working age or under 15 years old (whichever is higher), in accordance with the International Labor Organization Convention.

We strictly prohibit all forms of forced or compulsory labor, including indentured labor and slavery-like practices.

We have a zero-tolerance policy for human trafficking. We prohibit recruitment, transport, transfer, harboring or receiving people through coercion, fraud or deception.

Implementation & Enforcement

- Employment verification is conducted for all new hires.
- Workers and candidates are not required to pay fees to obtain employment.
- All employees enjoy freedom of movement (no passports or IDs are ever confiscated).
- Employment at Berkowsky and Associates is At Will and only the CEO has the ability to enter into a contract with any employee.
- Berkowsky reserves the right to question any supplier regarding the age of staff. All suppliers are required to maintain age-verification records and allow third-party audits.

Should any employee, customer, supplier, or subcontractor have any suspicion of abuse of this policy, the Company has designated an individual to receive complaints in accordance with the company's

Whistleblower Protections. The company's third-party HR consultant can be reached at 216.504.5316 or via HR@berkowsky.com.

Review

This policy is reviewed at least annually and updated as needed.