



XR Human Rights Policy

Last Review Date: June 26, 2025

Owner: Mick Hoogwoud

Approved by: Eric Rubenstein

Department/Scope: Global

Introduction

At XR, we believe in the inherent dignity and equal rights of all individuals. We are committed to respecting and promoting human rights across all aspects of our business. This Human Rights Policy (the “Policy”) sets out our principles and expectations, and serves as a practical guide for how we uphold these commitments in our day-to-day operations and broader business relationships.

Scope

This Policy applies to all XR companies and employees worldwide. We also expect our suppliers, contractors, and other business partners to adhere to the principles in this Policy.

Our Commitment to Human Rights

XR follows and complies with all internationally recognized human rights standards, including:

- The United Nations Guiding Principles on Business and Human Rights
- The Universal Declaration of Human Rights
- The International Labour Organization (ILO) Core Conventions
- The OECD Guidelines for Multinational Enterprises

XR is committed to:

- Upholding the dignity, freedom, and rights of all individuals
- Embedding respect for human rights into our culture, governance, and operations
- Preventing, mitigating, and addressing adverse human rights impacts
- Engaging transparently with stakeholders

Key Principles

Fair Labor Practices

We comply with all applicable labor laws, including those related to fair wages, working hours, and safe working conditions. We support the right to freedom of association and collective bargaining.

Safe and Respectful Work Environment

We are committed to maintaining a workplace that is safe, inclusive, and respectful. Discrimination, harassment, and any form of abuse are not tolerated. All individuals must be treated with dignity and respect. For more information, please refer to the [XR Code of Conduct](#).

Business Partner Expectations

We expect our suppliers, vendors, and partners to uphold the same human rights standards as XR. They must comply with all applicable labor and human rights laws and provide safe, fair, and ethical working conditions. See our [Supplier Code of Conduct](#) for more details.

**Non-Discrimination and Equal Opportunity**

We are committed to fostering diverse, equitable, and inclusive workplaces. All individuals must be treated fairly and without discrimination based on race, gender, ethnicity, religion, disability, sexual orientation, age, or any other protected status under applicable law.

Prohibition of Forced and Child Labor

XR strictly prohibits all forms of forced labor, child labor, human trafficking, and modern slavery. These practices are not tolerated in our operations or those of our business partners. See our [Modern Slavery Statement](#) for more information.

Compliance with Applicable Laws

We comply with all applicable laws and regulations in the jurisdictions where we operate.

Respect for Privacy.

We respect the privacy rights of all individuals and are committed to protecting personal data in accordance with applicable privacy and data protection laws

Due Diligence and Continuous Improvement

While XR does not operate in a sector typically associated with high human rights risks, we remain mindful of our responsibilities. We comply with applicable requirements and conduct appropriate due diligence where relevant. We also review our policies periodically to ensure they reflect evolving standards and stakeholder expectations.

Governance and Accountability

All XR employees are required to comply with this Policy and report any concerns through appropriate channels. Violations may result in disciplinary action, up to and including termination of employment or business relationships. Violations should be reported immediately through one of the following channels:

- People Team: peopleteam@extremereach.com
- Legal Department: legal@extremereach.com
- Via [YourVoice](#) (anonymous reporting available)

This Policy is overseen by our Legal and Corporate Affairs team. We work with business partners throughout the company, including The People and Culture team and Vendor Management team, to ensure compliance across our workforce and supply chain.

Related policies:

- XR Global Code of Conduct
- Employee Handbooks
- Supplier Code of Conduct
- Modern Slavery Statement

Review and Updates

This Policy will be reviewed periodically to ensure it remains effective and relevant. For questions or further information, please contact the Legal Department at legal@extremereach.com.