

OVERTURE

Overture Promotions, Inc

800 S. Northpoint Blvd, Waukegan, IL 60085

Human Rights Policy

Policy written by the Environmental, Social, and Governance (ESG) Department

Version 2.0

Release Date: 10/10/2025

1. Introduction

This policy replaces and expands upon Overture Promotions' previous Modern Slavery, Forced Labor, and Child Labor Policy to encompass a broader commitment to the protection and promotion of all internationally recognized human rights across our operations and supply chains.

Overture Promotions recognizes its responsibility to respect all internationally recognized human rights as defined by the United Nations Universal Declaration of Human Rights (UDHR) and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, including freedom of association, the right to collective bargaining, non-discrimination, equal opportunity, health and safety, and the prohibition of child labor.

We are committed to conducting business with respect to the rights and dignity of all people, ensuring fair treatment, safe working conditions, and freedom from harassment, discrimination, and abuse.

2. Scope

This policy applies to all employees, officers, directors, contractors, consultants, suppliers, and other business partners of Overture Promotions, including temporary/agency workers and any third parties acting on our behalf.

3. Alignment with International Standards

Overture Promotions aligns this policy with key international human rights standards, including:

- United Nations Universal Declaration of Human Rights (UDHR)
- ILO Declaration on Fundamental Principles and Rights at Work (freedom of association and collective bargaining, elimination of forced labor, abolition of child labor, and elimination of discrimination in employment and occupation)
- UN Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises
- UN Global Compact Principles (1–6)

OVERTURE

These standards guide our approach to identifying, preventing, and mitigating adverse human rights impacts throughout our operations and value chain.

4. Definitions

- **Modern Slavery:** Encompasses slavery, servitude, forced and compulsory labor, and human trafficking.
- **Forced Labor:** Work performed involuntarily under threat of penalty; includes debt bondage, retention of identity documents, and restrictions on freedom of movement.
- **Human Trafficking:** The recruitment, transportation, transfer, harboring, or receipt of persons by improper means (e.g., force, fraud, coercion) for the purpose of exploitation.
- **Child Labor:** Any work performed by a person under the minimum age specified by national law or ILO standards that deprives children of their childhood, education, or is harmful to their health or development.
- **Young Workers:** Workers above the child-labor minimum age but under 18; they shall not perform hazardous work or night shifts and must receive protections appropriate to their age.
- **Recruitment Fees:** Any fees or costs incurred in the recruitment process (e.g., placement, transportation, medical checks); no worker shall pay recruitment fees for work at Overture or its suppliers.

5. Policy Commitments

Overture Promotions commits to the following human rights principles. These apply to both our operations and our supply chain partners:

5.1. Non-Discrimination, Equal Opportunity, and Dignity

We prohibit discrimination, harassment, and abuse based on race, color, religion, sex, sexual orientation, gender identity or expression, national or social origin, ethnicity, disability, pregnancy, age, marital or veteran status, or any other status protected by law. We promote equal opportunity in hiring, advancement, compensation, and access to training.

5.2 Freedom of Association and Collective Bargaining

We respect employees' rights to form, join, or not join trade unions and to engage in collective bargaining in accordance with applicable laws. Where freedom of association is restricted by law, we facilitate parallel means of independent and free association and dialogue.

5.3 Fair Wages, Benefits, and Working Hours

We provide fair remuneration and benefits that meet or exceed legal and industry standards, and ensure working hours, overtime, rest periods, and paid leave comply with applicable laws and collective agreements.

5.4 Safe and Healthy Working Conditions

OVERTURE

We maintain a safe and healthy workplace, identify and mitigate hazards, provide necessary protective equipment and training, and foster a culture of prevention and continuous improvement in occupational health and safety.

5.5 Prohibition of Forced Labor, Modern Slavery, and Human Trafficking

We have zero tolerance for any form of forced labor, modern slavery, or human trafficking. Workers must be free to leave employment upon reasonable notice; identity documents shall not be confiscated; recruitment must be ethical with no worker-paid fees.

5.6 Prohibition of Child Labor and Protection of Young Workers

We prohibit child labor in any form. We follow national laws and ILO standards on minimum age, maintain age-verification procedures, and provide special protections for young workers.

5.7 Privacy, Grievance Respect, and Non-Retaliation

We respect privacy and personal data in line with applicable laws. We strictly prohibit retaliation against any person who raises a concern in good faith, participates in an investigation, or exercises human rights, including human rights defenders.

5.8 Responsible Sourcing and Environmental Justice

We consider human rights risks linked to environmental impacts (e.g., water stress, pollution, unsafe waste management) and vulnerable communities. We expect suppliers to prevent, mitigate, and remediate environmental harm with human rights implications.

6. Human Rights Due Diligence

We conduct ongoing human rights due diligence consistent with the UNGPs to identify, prevent, mitigate, and account for potential or actual impacts, including risks related to modern slavery, forced labor, child labor, discrimination, freedom of association, and unsafe working conditions. Activities include:

- Supply-chain mapping and risk screening (country, commodity, and supplier-level risks).
- Integrating requirements into sourcing, contracting, and onboarding.
- Supplier self-assessments, evidence reviews, and targeted audits/assessments.
- Corrective action plans with time-bound remediation when issues are identified.
- Periodic effectiveness reviews and escalation when progress is inadequate.

Findings are reviewed by the ESG Department and integrated into supplier engagement, audits, and remediation processes.

7. Supplier Code of Conduct and Ethical Recruitment

All suppliers must adhere to Overture's Supplier Code of Conduct, including strict prohibitions against modern slavery, forced labor, human trafficking, and child labor, and requirements on non-discrimination, freedom of association, health and safety, wages and benefits, working hours, and privacy.

OVERTURE

Ethical recruitment: Suppliers and labor agents must comply with the Employer Pays Principle—workers shall not pay recruitment fees. Suppliers must not withhold passports or restrict movement and must provide written employment agreements in a language workers understand.

8. Training and Awareness

We provide periodic training and awareness for employees in higher-risk roles (e.g., procurement, HR, warehouse/operations, and ESG), and we share expectations and resources with suppliers and business partners. Training topics include identifying red flags, ethical recruitment, grievance channels, and remediation expectations.

9. Reporting and Whistleblowing

We encourage employees, suppliers, and stakeholders to report concerns or suspected violations through available channels, including HR, managers, and the Overture Promotions Whistleblower process (see Employee Handbook). Reports may be made confidentially where permitted by law. Retaliation against good-faith reporters is prohibited. All reports are investigated promptly, and appropriate actions are taken.

10. Remediation

When adverse human rights impacts are identified, Overture will provide for or cooperate in legitimate remediation appropriate to the impact and consistent with the UNGPs. Remedies may include restitution, rehabilitation, corrective action plans, contract remedies, supplier capability-building, and—where necessary—suspension or termination of business relationships.

11. Governance and Oversight

The Senior Leadership Team and the ESG Compliance Department oversee the implementation and effectiveness of this policy. Progress, key incidents, and corrective-action status are reviewed at least annually and reported to Senior Leadership and/or the Board of Directors where necessary.

11.1 Acknowledgment & Governance

This Human Rights Policy is approved by Overture's Senior Leadership Team and forms part of the company's ESG and ethical compliance framework.

Acknowledgment of this policy is required for members of senior leadership and employees whose roles relate directly to human resources, procurement, supply chain management, or ESG compliance. These individuals are responsible for promoting and integrating the policy's principles within their departments and supplier relationships.

The ESG Compliance Department maintains acknowledgment records and monitors adherence. For all other employees, Overture ensures awareness of the policy through internal communications and training appropriate to their role.

Supplier acknowledgment is obtained through signature of Overture's Supplier Code of Conduct or other contractual agreements referencing this policy.

OVERTURE

12. Implementation, Monitoring, and KPIs

We track progress through qualitative and quantitative indicators, such as:

- Percent of Tier-1 supplier spend covered by the Supplier Code of Conduct (See Overture Promotions Sustainable Procurement Policy).
- Percent of at-risk suppliers with completed self-assessments and/or third-party audits.
- Percent of identified findings and % closed on time via corrective action plans.
- Employee training completion rates (overall and for high-risk functions).
- Number of grievances received, substantiated, and remediated; time to closure.
- Percent of suppliers verified as no worker-paid fees for recruitment.

We use results to inform continuous improvement and disclose relevant progress in ESG reporting and client assessments (e.g., EcoVadis).

13. Communication and Transparency

This policy is communicated internally and externally and made available to employees, suppliers, business partners, and other stakeholders upon request. We may publish summaries of progress and salient risks as part of our ESG reporting.

14. Policy Review

This policy will be reviewed at least annually by the ESG Compliance Department in coordination with the Human Resources Department and approved by the Senior Leadership Team.

The review will assess policy effectiveness, alignment with current laws and international standards (UDHR, ILO, UNGPs), and opportunities for improvement.

Updates will be communicated to employees, suppliers, and other stakeholders as appropriate.

15. Contact Information

For any questions or concerns regarding this policy, please contact:

hello@overturepromotions.com

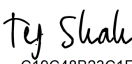
[Signature Page Follows]

OVERTURE

16. Policy Acknowledgment & Endorsement

This Human Rights Policy has been reviewed and approved by the Senior Leadership of Overture Promotions. The signatories below affirm the organization's commitment to implementing and maintaining the practices, expectations, and procedures outlined in this policy. This endorsement reflects our collective responsibility to promote sustainability, transparency, and ethical conduct across all procurement and supplier engagement activities.

Acknowledgments of Review and Approval

DocuSigned by:
Signature: 
C19C48B23C1F469...

Name: Tej Shah

Title: Chief Executive Officer

Date: 10/20/2025

Signed by:
Signature: 
A663755A5DD46E...

Name: Andrew Kelly

Title: ESG Compliance Manager

Date: 10/17/2025

OVERTURE

17. Revision History:

Revision History and Review Date	Summary of Change	Author
July 16, 2024	Version 1.0, "Modern Slavery, Forced Labor, and Human Trafficking Policy" drafted & approved.	Andrew Kelly, ESG Compliance Manager
October 10, 2025	Version 2.0, "Human Rights Policy" drafted and submitted for approval.	Andrew Kelly, ESG Compliance Manager